

COPY

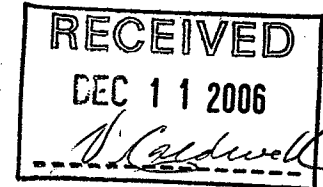
3.81



## BC READY-MIXED CONCRETE ASSOCIATION

20111 93A Avenue, Langley, BC V1M 4A9 ♦ T: 604-881-2522 ♦ info@bcmca.bc.ca

Mr. Doug Enns  
Chair, Board of Directors  
Worksafe BC  
Main Building  
6951 Westminster Highway  
Richmond, BC V7C 1C6



Re: Proposed Amendment: Regulation 3.22 to 3.26 New Entrants

Dear Mr. Enns:

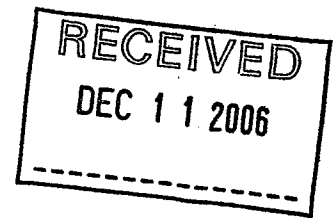
I am writing to you on behalf of the BC Ready-Mixed Concrete Association (BCRMCA) to express our strong opposition to this amendment going any further. This regulation, with its additional onerous paper documentation burden would bury any company. Therefore we are calling on the Board of Directors to instruct staff to remove this draft regulation from consideration.

BCRMCA Directors have carefully reviewed the draft. We have reached the following conclusions:

- 1) The proposed regulation is redundant. There are already regulations dealing with an employer's duty to train all employees and to document that training;
- 2) Further to the issue of redundancy, there already exists a duty to provide orientation for all workers of the risks associated with a new construction project;
- 3) The draft is counter productive to the Worksafe BC position of consult, educate, and then enforce. This prescriptive approach is reminiscent of the old policing model which was determined to be ineffective in changing employer behavior;
- 4) The draft regulation was distributed with no critical analysis behind it. We have no claims data which makes it's difficult to determine what the scope of the problem is and how a regulatory response would best serve the problem.

As an industry we joined the Construction Safety Network to address industry's need for safety training. The CSN has made significant progress in the area of best practices with rock scaling, the alternative to diesel as a cleaning agent and the recently adopted traffic control for slow moving work zones. They are currently working on several other initiatives including orientation for concrete pump operators for our members, and they will be identifying others in the near future. They are working on other general new entrant safety initiatives including examining the Lafarge Green Hand Program for its applicability throughout construction. The CSN consistently seek innovative response to issues such as the rise in worker participation in construction.

With many of these initiatives, the CSN has worked closely with Industry Services and the North Vancouver office to ensure that the valuable perspective of Worksafe BC is integrated into the final result. Instead of the development of more onerous regulations, Worksafe could be capitalizing on its partnership with industry on the problem of new entrants. In the summer CSN extended to Industry Services its willingness to take up the challenge of new entrants. This issue formed a significant part of its 2007 business that was adopted by the SEC on November 29, 2006.



At BC Ready-Mixed Concrete Association we are not opposed to regulations. But if we create a regulation that is virtually impossible to follow, it gets ignored. Amongst all our members, large or small, that potential is there. We strongly urge Worksafe BC to withdraw this draft in favor of the more positive partnership approach.

Sincerely

Carolyn Campbell  
Executive Director

cc David Anderson, CEO, Worksafe BC  
Roberta Ellis, Vice-president, Worksafe BC  
Irv Lenz, President, BCRMCA  
Stan Weismiller, Chair CSN



B.C. READY-MIXED CONCRETE ASSOCIATION  
20111 93A Avenue  
Langley, B.C. V1M 4A9

8

Ms. Roberta Ellis  
Vice-President, Worksafe BC  
Main Building  
6951 Westminster Highway  
Richmond, BC V7C 1C6

RECEIVED  
DEC 11 2006

**VIP COURIER SERVICE**

Trip # 0547  
Pieces # 1 of 1

THE LOWER MAINLAND SPECIALISTS  
WWW.VIPCOURIER.COM  
604-253-7874

RECEIVED