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Business Council of
British Columbia

November 29, 2006

WorkSafeBC
Workers' Compensation Board of British Columbia
Prevention Policy & Regulation Review Department
Policy and Research Division
P.O. Box 5350 Station Terminal
Vancouver, BC V6B 5L5

**Re: Proposed Amendments to the Occupational Health and
Safety Regulation**

We would like to thank WorkSafeBC for the opportunity to respond to the proposed amendment to the *Occupational Health and Safety Regulation*.

By way of background the Business Council of British Columbia, established in 1966, is an association representing approximately 200 large and medium-sized enterprises engaged in business in British Columbia. Our members are drawn from all major sectors of the provincial economy, including forest products, mining, manufacturing, transportation, agri-food, telecommunications, information technology, financial services, energy, tourism, retail, construction, healthcare, education and the professions. Taken together, the corporate members and the associations affiliated with the Business Council are responsible for one-quarter of all jobs in British Columbia.

Our comments on the three parts of the *Regulation* which are subject to proposed amendments are as follows.

Part 3 - Young or New Workers

We have reviewed the proposed changes under Part 3 very carefully. The Business Council always has, and will continue to, support health and safety training for young and new workers. We therefore support the intention of the proposed changes.

Continued



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However, we do not support the provisions contained within proposed Section 3.25. Many industries have casual, temporary and part time workers who move frequently between job sites or where the risks of the work change on a constant basis (i.e. construction). To comply with the proposed Section 3.25, employers would have to be constantly monitoring and assessing a young or new worker's safety performance. We believe this to be more onerous than is necessary.

The Business Council recommends that WorkSafeBC work with various industry and sector groups to assess the level of risk in each industry and determine a compliance model that makes sense for that particular industry.

If our recommendation is accepted, it would require proposed Section 3.26 (a) be amended by striking out the words "under section 3.25"

Part 4 - Working Alone or In Isolation

The Business Council supports the proposed changes with the following caveat. We would urge WorkSafeBC to work with industry to develop guidelines which are workable, appropriate and treat all employers who will be affected by the change equally.

Part 6 - Biohazardous Materials

We have reviewed the proposed changes to Part 6 with employer representatives in the health care industry and we support their submissions to you on this issue.

Again, we thank you for the opportunity to comment on the proposed changes to the *Regulation*. If you have any questions, please do not hesitate to contact me.

Yours truly,

A handwritten signature in black ink, appearing to read "Douglas M. Alley".

Douglas M. Alley
Vice President - Human Resources