



**CAMPBELL**  
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*Building the Future*

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November 20, 2006

WorkSafe BC  
Policy and Research Division  
6951 Westminster Highway  
Richmond, BC V7C 1C6

Attention: Ms. Anne Burch, Director Prevention Policy & Regulation Review Department

Dear Ms. Burch:

I am writing on behalf of our firm. I oppose the proposed WorkSafe BC regulation, which deals with the training of new and younger workers (under 24 years of age).

Although we support draft regulation 3.22 and 3.24, we oppose the additional draft regulation 3.25 and 3.26, which require a company to assess the safety performance of a young worker every two months of the first six months of that workers employment.

We have an ongoing safety orientation programme that is a requirement of employment with our firm. All new workers regardless of age are required to complete and sign off on this programme.

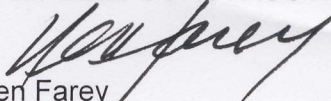
To require this ongoing assessment of the worker every two months with all the paper it would generate would create a very real strain on our resources from a safety point of view and in our view not accomplish the required result.

Please note that after review of our 2006 claims to date we find in our firm the average age of a worker who generates a claim is 36 years of age. In our view this means that our workers have not been a greater risk up to age 24 and would not justify a programme such as this for their age group.

We trust you will consider our concerns regarding this very important and detrimental change and the regulation that will, in our view, have a negative impact on all construction firms in BC and will possibly take time and effort away from our ongoing safety programme.

Yours truly,

CAMPBELL CONSTRUCTION LTD.

  
Ken Farey  
President