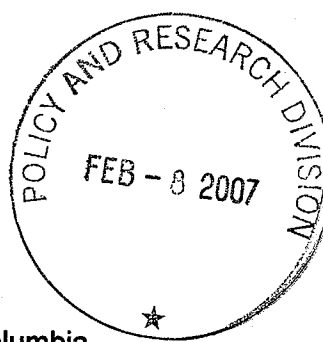


January 31, 2007



3.92.
Canadian Council of Grocery Distributors
Conseil canadien des distributeurs en alimentation

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

To Whom It May Concern:

On behalf of the Canadian Council of Grocery Distributors (CCGD) and its BC based members, please accept this letter as stakeholder input to the proposed amendments to Part 3: Rights and Responsibilities in the Occupational Health and Safety Regulations. CCGD and its members believe that providing adequate training and orientation relative to OH&S to new hires is both good business practice and a social obligation. As such we are supportive of the amendments under sections 3.23 but do have some concerns regarding the requirements under section 3.25.

The Canadian Council of Grocery Distributors (CCGD) is a not for profit organization committed to advancing and promoting the grocery and foodservice distribution industry in Canada. We recognize, advance and promote industry best practices for the benefit of our members and the Canadian consumer.

The food distribution and retail grocery industry is Canada's second largest commercial sector, next to the automotive industry. Our members represent \$70.1 billion in grocery and \$12 billion in foodservice sales and employ over 455,000 Canadians. Our members represent 85% of all grocery (i.e. food, non-food, non-alcoholic beverages) distribution sales in Canada.

In British Columbia CCGD members are amongst the largest employers in the province. The sector employs over 65,000 British Columbians in some 2,300 food stores with sales of approximately \$9.7 billion.

As indicated previously, CCGD is supportive of the amendments under section 3.23 in that they detail requirements that are generally already included within the regulation within one section. This means that employers have a comprehensive list of training requirements making it easier for an employer to understand their obligations and what they need to do to be in compliance.

CCGD's key concern surrounds the requirement to undertake employee assessments every two months for the first 6 months. This requirement is unnecessarily prescriptive, is very administratively difficult and will be very costly to develop and implement. The retail grocery industry is a relatively simple business model which is generally free from many of the concerns associated with other forms of business and industry. Consequently risks associated with complex equipment, machinery or hazardous chemicals are largely absent from the industry.

2005-2006

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The Kitchen Table

Bruce Soltis
SYSCO Food Services of Canada, Inc.

* Indicates members of the
Executive Committee/
Membres du comité exécutif

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WESTERN/OUEST

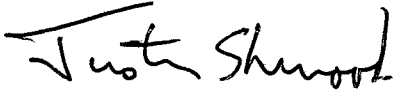
112, 7710 - 5 Street SE
Calgary, Alberta
T2H 2L9
Tel./Tél. : (403) 250-6608
Fax/Télé. : (403) 250-7022

In addition the industry experiences a very high degree of turn-over, especially in part-time staff, and usually within the first few months of hiring. Monitoring, correcting, and documenting OH&S issues is already part of a supervisor's health and safety responsibility whether with a new hire or an existing employee. Lastly, the Board can, at any time, request proof that training, monitoring and corrective actions are being undertaken

As a consequence the provisions of section 3.25 represent a significant and very onerous requirement for the retail grocery industry, especially when the requirement for ongoing supervision of OH&S and present Board powers are taken into consideration. These requirements will drive significant complexity and cost to the business. We would therefore recommend that the requirement be dropped in favour of a requirement obligation to train at the point of hiring and then based on the nature of a job function (i.e. in jobs that involve production, or use of equipment, etc.) to conduct an assessment after 6 months of employment for employees who may be at a higher risk.

CCGD and its BC based members thank you in advance for your consideration of our input. I am available at 403-250-6608 to answer any questions.

Sincerely

A handwritten signature in black ink that reads "Justin Sherwood". The signature is written in a cursive style with a large initial "J" and "S".

Justin Sherwood
Vice-President, Western Region