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December 7, 2006

Mr. Doug Enns
Chair, Board of Directors
Worksafe BC
P.O. Box 2071, Stn. Terminal
Vancouver, BC V6B 3S3

Re: Proposed Amendment: Regulation 3.22 to 3.26 New Entrants

Dear Mr. Enns,

I am writing to you on behalf of The Canadian Home Builders' Association of British Columbia to express our strong opposition to this new amendment proceeding. We are partners with other like industry members, in the Construction Safety Network. In a recent study conducted by Dr. Daniel Skarlicki, he noted that 40% of the workforce has less than one year experience with the surveyed company. This new regulation, with its additional onerous paper work would burden any company, especially the small businesses that our association represents. Therefore we are calling on the Board of Directors to instruct staff to remove this draft regulation from consideration.

At CHBA BC we have carefully reviewed the draft and have concluded:

- 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, 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;
- 4) The draft regulation was distributed with no critical analysis behind it. We have no claims data; consequently 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: asphalt plant worker orientation, top plate work practices, concrete pump worker orientation and will be identifying others in the near future. this. The CSN will be providing similar services to other industry ITOs. They are working on other general new entrant safety initiatives including examining the Lafarge Green Hand Program for its applicability throughout construction. They consistently seek innovative response to issues such as the rise in worker participation in construction.

At the recent Annual General Meeting of the CSN, Diana Miles noted the work of the CSN and praised our efforts to make job sites safe.

CHBA BC realizes that there is a need for some 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 support our government whose mandate is less regulation to help industry perform better. CHBA BC represents over 1300 builder companies in the province, and our members contribute over 10 billion dollars annually to the provincial economy. We strongly urge Worksafe BC to withdraw this draft in favor of the more positive partnership approach.

Sincerely,



Chris Ricketts
Past President CHBA BC
Board Member CSN

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