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Submission ID: P08.XW6.P92.7BR

Part 3: Rights and Responsibilities, relating to the orientation and training needs of young or new workers

1. Name: Mike Arbogast

(a) Feedback is provided: on behalf of

Organization: Capilano College

(b) Feedback is provided: from an employer's perspective

2. E-mail:

3. Feedback:

Sections 3.22 to 3.26

We agree with the intent of the draft regulations but have concerns about the administrative requirements and lack of onus placed on the worker. First, the administrative requirements of keeping track of every worker over time are onerous and prescriptive in nature.

In particular 3.25 is administratively onerous and difficult to achieve. How do you assess performance on the job in regard to safety? Tests, observations?

Suggestion: delete this section and put in a general requirement that follow up is required on a regular basis

Second, there is no requirements for the worker. Surely we want to emphasize their important role. Why place all responsibilities on the employer? Include an expectation that new and young workers are responsible for complying with the organization's and WCB's health and safety requirements.

4. Please indicate your level of support of the proposed amendments: generally agree