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Council of Construction Associations
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Grant McMillan, President

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Ms. Anne Burch
Director, Prevention Policy & Regulation Review Department
Policy and Research Division
WorkSafeBC

Dear Ms. Burch:

I am writing on behalf of the Council of Construction Associations with respect to the proposed new WorkSafeBC regulation which deals with the training of new and young workers.

The Draft proposes:

Employers must train new or young workers as follows:

- (a) the name and contact information for the young or new worker's supervisor;
 - (b) the employer's and young or new worker's rights and responsibilities under the *Workers Compensation Act* and this Regulation including the reporting of unsafe conditions and right to refuse to perform unsafe work;
 - (c) workplace health and safety rules;
 - (d) hazards to which the young or new worker may be exposed, including risks from robbery, assault or confrontation;
 - (e) working alone or in isolation;
 - (f) violence in the workplace;
 - (g) personal protective equipment;
 - (h) location of first aid facilities and means of summoning first aid and reporting illnesses and injuries;
 - (i) emergency procedures;
 - (j) instruction and demonstration of the young or new worker's work task or work process.
- (3) Within two weeks or as soon as practicable after a young or new worker begins work in a workplace, the young or new worker must receive orientation and training respecting the following topics:

- (a) the employer's health and safety program;
- (b) WHMIS information requirements set out in Part 5, as applicable to the young or new worker's workplace;
- (c) contact information for the occupational health and safety committee or the worker health and safety representative, as applicable to the workplace.

We wish to make it clear that we support the training of new and young workers. Training is essential if these workers are to understand the hazards of the job and learn to eliminate or control them. In fact, COCA initiated the Construction Safety Association of BC in cooperation with WorkSafeBC. CSABC offers a Certificate of Recognition program which is delivered through our regional partners and which provides a high quality, consistent training program specifically designed to safeguard the worker on construction sites. The CSABC program includes interactive, computer-based worker training which is directly focused on the new and young worker. The 12 elements of this training program include requirements for training as proposed in the WorkSafeBC Draft regulation.. The computer-based training also provides built-in verification and documentation. CSABC offers this program as part of a strategy that includes training for company owners and supervisors.

While we support the Draft regulation 3.22 to 3.24, we strongly oppose the additional Draft regulation (3.25 to 3.26) which would require a company to assess the safety performance of a young worker every two months for the first six months of that worker's job.

This requirement would affect every worker age 24 or younger each time there is a change to the hazards in the workplace or each time the worker changes locations.

For the Construction Industry, this would mean an endless cycle of written documentation and record keeping. Construction workers have a high turnover rate of employees. It is common for a company with a Full Time Equivalent of 20 workers to have 60 or more individuals come and go in the course of one year. Many of these workers are under 25 years of age. The workers also move from one area to another within the construction project. And the construction project itself is continually changing as the project is constructed, demolished or renovated.

The ongoing assessment of a new or young worker is not practical in an industry where change is the only constant. There is so much movement and change of location/job/activity within the 180,000 workers in construction that there would be continuous and non-stop requirements for assessments.

To summarize:

1. We support the specified training for new and young workers as well as the documentation of this initial training. This provides an element of Due Diligence – proof

that the training has been done.

2. We oppose the excessive requirement of the written assessment and documentation of the new or young worker's safety performance every two months for the first six months. This is an unreasonable level of paperwork that would probably not be done and would create a bureaucratic nightmare of enforcement.

We look forward to your response.

Sincerely Yours

Grant McMillan