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November 16, 2006

Worksafe BC
Prevention Policy & Regulation Review Department
Policy & Research Division

Re: Proposed Amendments for Part 3: Rights and Responsibilities in the OH & S Regulation

Section 3.23

Proposed Requirement (1)

- We strongly support the training of all new employees, regardless of age. This is reflected in our company OH & S policy.

Proposed Requirement (2) and (3)

- We strongly support the documentation of initial training. Our company policy is to train all new workers within two (2) weeks after employment begins. Documentation of all training is needed to show due diligence.

Section 3.24, 3.25, and 3.26

We strongly oppose the excessive and onerous record keeping and paperwork requirements of proposed sections 3.24, 3.25 and 3.26. We are a mechanical contractor in the construction industry and feel these proposals simply would not work in construction. Please consider the following:

- The requirement for written assessment and documentation of a workers safety performance three (3) times in the first six (6) months of employment is simply not practical. Most contractors would not do this paperwork and it would create a large burden on Worksafe BC to try and enforce this proposal.
- It should be noted that the construction labour workforce is highly mobile and most contractors have a high turnover rate, it is the nature of the industry. With almost 200,000 workers in the industry, there would be a continuous and non stop requirement for assessments.

We work hard to provide a safe workplace and good safety training for our employees. Like many contractors we are working on achieving our certificate of recognition (COR) for OH & S. We strongly oppose sections 3.24, 3.25 and 3.26. We feel they are not all practical for the construction industry.

Please feel free to contact the undersigned to discuss these matters further.

Sincerely,

Paul Bemeule CSO, GSC
Project Manager; Daryl-Evans Mechanical Ltd.
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