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**From:** Jeff Shecter [shecky@shaw.ca]  
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November 9, 2006

Workers' Compensation Board of British Columbia  
Prevention Policy & Regulation Review Department  
Policy and Research Division  
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**RE: NEW PROPOSED REGULATION FOR ASSESSING SAFETY PERFORMANCE OF NEW AND/OR YOUNG WORKERS**

I understand that the WCB of BC is in the front line on initiating safety programs that will reduce workplace injuries, but this recent proposal tarnishes the reputation of the WCB as an innovative organisation.

This proposal will only add unnecessary levels of bureaucracy and paperwork. I can only think that this was thought up in some make work lab for up and coming occupational safety professionals.

I would support this if the board also added the requirement that these young workers be implanted with an RFID device that would track their movements around a worksite. Then these transponders could relay this information to the board on a real-time basis as to when they were entering new boundaries previously off limits to them. Perhaps the transponders could work both ways and send a high pitched signal to the implanted chip which would send a slight pain signal to these workers reminding them that they should adjust their newly acquired PDA's that they were entering this new area. Everyday this electronic record could be downloaded to the WCB office so that your data entry clerks could keep track of the targeted audience.

We could keep going with this scenario, but I would think that this might be at this time a bit too far fetched for the Board. But realistically the technology is not that far off and it would not be cumbersome as it would be the WCB's cost to monitor and record keep. Which seems what the Board wants with this proposal.

Also think of the possibilities of sharing this information with other government departments or even selling the info to footwear companies. This could be a cost neutral item for the Board and thus no need to raise our rates for this harebrained scheme.

A better idea might be for the WCB to be part of the curriculum in the apprenticeship programs and

even the secondary schools. Industry wants employees who are aware of their surroundings, cognizant of hazards and risk, while at the same time being responsible and productive. Surely the safety braintrust at WorksafeBC can come up with a proposal that responds to these criteria, as well as being cost neutral. This is what the BC economy needs!

Kind Regards

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