



2006 November 23

Ms. Anne Burch  
Director, Prevention Policy & Regulation Review  
WorkSafeBC  
Policy and Research Division  
PO Box 5350, Stn Terminal  
Vancouver, BC V6B 5L5



Dear Ms. Burch:

Re: Proposed Regulations with respect to Training of New or Young Workers

As you may be aware, the GVRD Labour Relations Department represents 15 Municipalities and the GVRD itself in matters related to labour relations, workers' compensation and associated employment issues. We would like to thank you for the opportunity to comment upon the proposed Regulations concerning the training of new or young workers.

We support some of the proposed changes, but we would like to make clear our opposition to the proposed requirement for ongoing documentation for a safety assessment with respect to this training.

We completely agree with the concept that new or young workers need appropriate training and supervision to help to safeguard them at work. Our municipal members have made large investments in resources to ensure these activities. We all have extensive training and orientation programs for all of our staff.

We therefore support the proposed Regulations 3.22 and 3.23, which specify what training elements should form the basis for training new workers and for those workers who are under the age of 25.

However, we do not support the proposal that would mandate the level of ongoing documentation every two months of the first six months. Specifically, we do not support proposed Regulations 3.25 and 3.26.

These Regulations would generate a vast amount of paper, especially as workers move to new work or new positions on a regular basis, but would not improve workplace safety.

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The Government of British Columbia has committed to the elimination of unnecessary regulation in all ministries and agencies. We ask that you act in this spirit and eliminate the proposed Regulations 3.25 and 3.26.

We look forward to your response.

Yours truly,



Malcolm Graham

Manager, Labour Relations

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