

January 11, 2007

Doug Enns  
Chair, Board of Directors  
WorkSafeBC  
PO Box 2071 Stn Terminal  
Vancouver, BC V6B 3S3



Dear Doug:

**Re: Proposed Amendment: Regulation 3.22 to 3.26 New Entrants**

ICBA must express strong opposition to any further action regarding this amendment.

After carefully reviewing the draft, ICBA has also concluded that the proposed regulation is redundant, since there are already regulations in place to cover the training of all workers including new entrants. Employers must also provide orientations about risks inherent in new construction projects.

The regulation as proposed will therefore create a new layer of red tape that is unnecessary. It creates no added value, will be difficult to implement, and contributes to the continued problem of overregulation of small businesses.

ICBA recognizes the need for strict safety regulations in the workplace, especially in a potentially dangerous environment like a construction site. And through our ongoing efforts, such as courses taught in the BC Construction and Safety Training Centre, we attempt to ensure that BC's construction industry operates at the highest possible safety standard. But onerous regulations of questionable value simply aren't the answer.

ICBA strongly urges WorkSafeBC to withdraw this draft in favour of the more positive partnership approach.

Sincerely,

A handwritten signature in black ink, appearing to read 'Philip Hochstein'.

Philip Hochstein  
President

Cc: David Anderson, CEO, Worksafe BC  
Roberta Ellis, Vice President, Worksafe BC  
Stan Weismiller, Chair, Construction Safety Network

