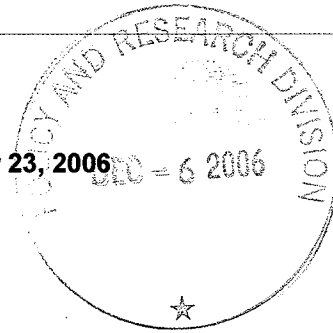




3.70

November 23, 2006



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

**Dear Ms. Burch:**

**I am writing on behalf of the ITC Group of Companies with respect to the proposed new WorkSafeBC regulation which deals with the training of new and young workers.**

**ITC fully supports Regulation governing the training of workers in our industry, and we have initiated a safety training program that utilizes the CSABC Safety Star (Certificate of Recognition) curriculum.**

**We have utilized this training not only to meet the minimum requirements of the C.O.R. program, but for all staff at all levels. To date, we have trained over 50 workers, 24 supervisors, and 20 senior managers in their respective courses. We have undertaken to facilitate this curriculum to our group of over 60 sub-trade employers and their staff as well.**

**In addition to this program, we employ full time safety officers on all of our project sites who continually monitor and assess the safety performance and knowledge of workers. Tool-box meetings are held regularly and are another forum for training in both general topics, and in specific work procedures.**

**We have an extensive orientation program that utilizes the "Lost Youth" video for all new and young workers. It has a serious and sobering impact every time it is viewed.**

**We fully support the Draft Regulation sections 3.22 to 3.24, but we oppose sections 3.25 to 3.26.**

**We constantly monitor the safety performance of all employees, especially during their probationary period, and train or re-train accordingly.**

**We feel that in our industry, valuable time and resources would be spent on achieving compliance with sections 3.25 and 3.26, and that this expenditure would not have the intended effect. In fact, due to the high turnover and transient nature of the workforce, the time and administration required to comply would best be utilized maintaining our existing system of continual monitoring and improvement.**





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Thank you for the opportunity to have input in this matter.

We look forward to your response.

Sincerely,

**Jeffery Lyth**  
Director of Corporate Health and Safety

