Submission ID: P08.YB6.BL2.8K3

Part 3: Rights and Responsibilities, relating to the orientation and training needs of young or new workers

1. Name: Ken Hall

(a) Feedback is provided: on behalf of
Organization: Kenar Electrical Ltd.
(b) Feedback is provided: from an employer's perspective

2. E-mail:

3. Feedback:

3.22 The definition of a 'new worker' is very ambiguous for construction. Workers constantly change workplaces where the new site does not present any new hazards.

Alternatively the worksite will change as the job progress's and may even change multiple times in a day. These changes could be implemented by other contractors with no scheduling or input to each trade.

This creates such a subjective call where every contractor could be found in non compliance of this proposed reg. at any given time.

I beleive this regulation is currently covered by the toolbox talks which are instituted on a regular basis if new hazards are present on a project.

3.23 (j) & 3.24(a)

These rules would create such a paperwork burden for apprentices that no employer would ever consider training apprentices again. The onsite training of apprentices is continuous and not documented. In the beginning of their training they are shown multiple things everyday. This training is done as a particular tasks comes up and can be done by numerous people on the site. The basis of apprenticeship is on the job training and not documented 'book' training.

I feel that apprenticeship training already includes all the feedback requirements in this regulation and construction should be excempt from such onerous regulations.

4. Please indicate your level of support of the proposed amendments:generally disagree