

November 14, 2006



**WorkSafeBC**

Prevention Policy & Regulation Review Department  
Policy and Research Division  
P.O. Box 5350, Station Terminal  
Vancouver, B.C.  
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Dear Sirs:

**Re: Proposed WorkSafeBC Regulation  
Changes to Young Worker Training**

It has been brought to our attention that WorkSafeBC is contemplating changes to the regulations regarding the training of new workers. We support the training of new and young workers and recognize this is necessary if these workers are to understand the hazards of the job and learn to control them.

We support the documentation of this initial training. This provides an element of "due diligence" – proof that the training was done.

However, we must oppose the requirement of the written assessment and documentation of the new or young workers' safety performance every two months for the first six months. In our industry (the Construction Industry) ongoing assessment of a new or young worker is not practical in an industry where change is the only constant.

The construction workforce has always been highly mobile. Even more so today with the busy construction industry across Canada. As a result with more inexperienced new or young workers entering the industry, an employer could, for example, cycle through four times as many workers as the number of positions that are available. The work force may also be composed of labour contract workers, who are very short-term. Significant movement and change of location, job activity, and/or employer would result in continuous and non-stop requirements for assessments. This would create an unreasonable level of paperwork that would unfortunately from a practical perspective result in the work likely not being done and would create a bureaucratic nightmare of enforcement. As a result, we do not believe the goals of WorkSafeBC would be achieved.

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The construction industry has already taken the initiative on new and young workers. The Construction Safety Association of BC, in cooperation with WorkSafeBC, offers a Certificate of Recognition program. The CSABC program includes interactive, computer-based worker training. The 12 elements of this training program include the proposed requirements for training. The computer-based training also provides built-in verification and documentation. CSABC offers this program, through its regional partners, to all regions of BC.

We thank you for your consideration in our opposition of this proposed regulation. Hopefully a more practical solution can be found to address the concerns of WorkSafeBC in this regard.

Yours truly,

**LOCKERBIE & HOLE CONTRACTING LIMITED**



M.C. (Mike) Zaine, P. Eng.  
Vice President & Regional Manager

MCZ/laa