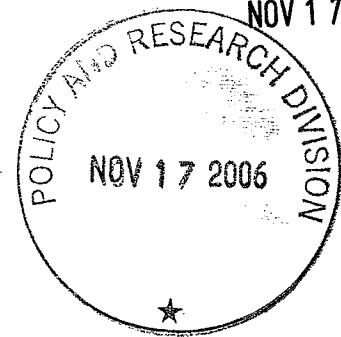




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November 6, 2006

Workers' Compensation Board of British Columbia
Prevention Policy & Regulation Review Department
Policy and Research Division
P.O. Box 5350 Station Terminal
Vancouver BC V6B 5L5

Re Proposed amendments to Part 3: Right and responsibilities (Young or new workers) in the Occupational Health and Safety Regulations

Thank you for the opportunity to respond to the proposed changes to the WorkSafe BC Occupational Health and Safety Regulations.

At MDS Metro, we have worked hard to ensure that we are reducing the risk of injuries to our staff and to this end have increased our internal resources for Occupational Health and Safety. We are pleased to see a continual decrease in our incident rates and lost time rates over the past few years and are working to sustain this decreasing trend.

Intuitively, one may expect higher injuries among workers younger than 25 however, at MDS Metro, our experience does not reflect this. Rather, our incident statistics indicate that we have a higher incidence of injuries among employees in their 40's. At MDS Metro however, we are placing equal emphasis on incident reduction in all age categories and continue work towards improving the health and safety of our employees.

Section 3.25 (2) proposes that "[e]very two months of the first six months of a young worker's employment with an employer, the employer must assess and document the young worker's performance to determine if the young worker is performing work tasks or work processes safely." Based on our historical incident data, we submit that this frequency of evaluation is perhaps over zealous and will not in fact reduce injuries to young employees in our industry. We would propose that the normal safety orientation at time of hire is followed up with a 3 month review. This review would evaluate the employee's retention of the training provided and ensure that they are demonstrating understanding by complying with the safety requirements for their job. We believe this strategy would be a more appropriate and meaningful approach for our industry.

I thank you in anticipation of a favorable consideration in this matter. Please feel free to contact me directly, or Louise Wynne, our EHS Specialist & Ergonomist on 604 412 4500 (ext 3009) should you require additional information.

Yours truly,

Nigel Banks
Vice President Human Resources
MDS Metro Laboratories

Copy:

BC Business Council