
Submission ID: P09.5W6.W92.GB2

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

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- (a) Feedback is provided: on behalf of
Organization: Malaspina University-College
- (b) Feedback is provided: from an employer's perspective

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Part 3 Rights & Responsibilities Section 3.22 to 3.26
Excellent improvements to the regulations and clearly identifies responsibilities for employers for both young workers and for workers new to a job. While there has always been a requirement to provide orientation & training in the past, it has been very vague and subject to interpretation by employers. Having it specifically identified should improve the level of safety at many workplaces. Unfortunately, unless there are inspections and/or enforcement, these regulations, like so many others, will do little to reduce injuries. Those employers that recognize their obligations to ensure a safe workplace will already satisfy these requirements, whereas employers that do not recognize / accept these responsibilities will not and workers, new and young alike, will have to be injured before compliance is achieved. An unfortunate situation.

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

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Part 4: General Conditions, relating to prepayment at service stations in urban areas during late night and early morning hours

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Sections 4.20.1 and 4.23.1

The restrictive limitations confining the enforcement / requirements of the pre-paying option to only "urban areas" and excluding "non-urban areas" (i.e. < 5000 people) sets up a "double standard". Workers in service stations in non-urban areas are at equal or greater risk than workers in urban areas for the following reasons:

1. Lower levels of police / emergency response resources available thereby allowing criminals a greater opportunity to evade capture.
2. More transient activities / clientele (i.e. usually situated along highway corridors, e.g. Cache Creek, Clinton, 150 Mile House, McLeese Lake, etc) where "gas and dash" opportunities are more prevalent.
3. Because of 1 & 2 above, the incidents which do occur at non-urban areas go unreported more often than not.
4. Workers in ALL similar workplaces are entitled to the same level of safety regardless of the local population.
5. There is the possibility that increased enforcement in "urban areas" may cause a shift in crime away from those areas to "non-urban areas" where there are easier targets.

There is no valid reason / argument to make any separate distinction.

Not sure why the mention of "card lock" systems is included since (a) these locations rarely have attendants except during the daylight hours (if then); and (b) that system is designed to work "unattended" and has been in place and working well for years.

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

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Part 6: Substance Specific Requirements, relating to safety-engineered devices for all hollow bore needles

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Section 6.33 definitions

Acceptable definitions, with the possible exception of changing "broken glass" to "broken glassware" (e.g. ampules, test tubes, tubing, etc) and avoid confusion with a broken window (although it wouldn't be a "medical" sharp, unless it occurred in a hospital).

Should have included definitions for "needleless device" and "body fluids" (as there are varying opinions on the latter).

Section 6.36 (1.1)

Great improvement in the clarity of when the appropriate safety device is required. The implementation date should be sooner (e.g. July 1, 2007 or September 1, 2007)

Section 6.36 (1.2)

See no need for delaying this requirement a full 10 months after the proposed date for implementation of 1.1. These devices have been around for some time and the dates should be concurrent. Some latitude could be afforded if the January 1, 2008 date is move earlier, but is there really a need to delay this further.

Section 6.36 (1.3)

Delete sub-section (a); as there is potential for this exemption to be misused / misapplied for the sake of expediency. Alternatively, modify sub-section (a) to indicate what is meant by this (i.e. currently TOO subjective).

Under sub-section (b): Do we really need a regulation to state that if there is nothing commercially available then there is an exemption for requiring it? Seems rather superfluous / redundant.

Under sub-section 1.5, it appears to leave the assessment entirely in the hands of the employer. This should be a "joint" determination using the Joint OH&S Committee, following consultation with the users to be consistent with other similar requirements of the regulations (e.g. ergonomic (MSI) requirements).

Under sub-section 1.6: while it states that the safe work procedures and practices are to be developed and implemented before the use of the new safety devices, it merely implies that an integral part of the SWP would be training. Could be better stated to remove all doubt that training is integral and contingent on the availability of the safety devices (i.e. no point in providing training when the devices won't be available for +/- 6 months. By then the training would be all but forgotten and a greater safety risk have developed by people trying to recall how to use the device.

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