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Workers Compensation Board of BC  
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Re: Proposed Amendment to Part 3 Rights and Responsibilities in the Occupational Health and Safety Regulations.

While Maxwell Floors supports the Draft regulation 3.22 to 3.24, we strongly oppose the additional Draft regulation (3.25 to 3.26) which would require a company to assess the safety performance of a young worker every two months for the first six months of that worker's job.

Within our industry the level of movement between workplace sites and different locations will entail the company to be engaged in continuous and non-stop documentation of "young worker" safety orientation and skills assessment.

Changes to workplace [site] do not necessarily incur exposure to additional new hazards. With the requirement to perform the same WIMIS and Safety orientation the effectiveness of the program is compromised.

Maxwell Floors recognizes the need for training and assessment of "Young Workers" over a period of time, but find the record keeping clause for movement between Job Sites and projects counter productive and redundant.

Sincerely,

Lyla Samuels

Cc: Hamish Roper