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November 9, 2006

W.C.B.
Prevention Policy & Regulation Review Dept
Policy and Research Division
P.O. Box 5350 Station Terminal
Vancouver, BC V6B 5L5

**RE: NEW PROPOSED REGULATION FOR ASSESSING SAFETY
PERFORMANCE OF NEW AND/OR YOUNG WORKERS**

We oppose the excessive requirements of written assessment and documentation of the new or young worker's safety performance every two months for the first six months. This is an unreasonable level of paperwork; in these busy times there would be a high risk of this additional paperwork being overlooked, and enforcement would be both time-consuming and difficult.

The ongoing assessment of a new or young worker is not practical in an industry where change is the only constant. There is so much movement and change of location/job/activity within the 180,000 workers in construction, that there would be continuous and non-stop requirements for assessments. The construction workforce is highly mobile, and is often composed of short-term labour contract workers. The turnover of workers is very high.

With the shortage of skilled trades, the booming Construction Industry, and the fast approaching 2010 Olympics, the extra burden the proposed regulation would place on us as employers could negatively impact many building projects, increasing both completion costs and time-frames.

Sincerely,



Ed Rivard
President

Supply - Detail - Cut and Bending Steel