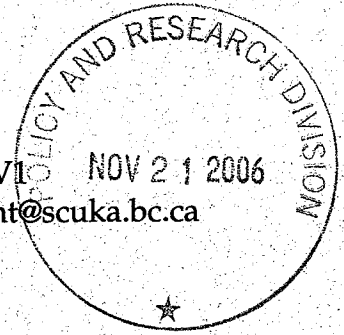


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November 9, 2006

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  
Email: [Regquery@worksafebc.com](mailto:Regquery@worksafebc.com)

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

The Construction Industry as a whole understands the importance of, and supports, Safety Training for all workers, and in particular new and young workers. Training is necessary if workers are to understand the hazards of the job, and avoid injury and/or unsafe practices.

We support the documentation of this initial training; it provides proof that the training has been completed, and shows Due Diligence. That being said, we oppose the excessive requirement 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. An employer with 20 full-time positions may actually have as many 80 workers cycle through those positions in one year.

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. This computer-based training also provides built-in verification and documentation. CSABC offers this program, through its regional partners, to all regions of BC - so it is easily accessible to employers.

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

Sincerely,  
SCUKA ENTERPRISES LTD.

Dan Scuka, President  
/pw

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