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**BRITISH COLUMBIA CONSTRUCTION ASSOCIATION/  
COUNCIL OF CONSTRUCTION ASSOCIATIONS**

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Architectural Woodwork  
Manufacturers Association  
of BC

BC Construction  
Association

BC Contract  
Cleaners Association

BC Floor Covering  
Association

BC Insulation Contractors'  
Association

BC Ready - Mixed  
Concrete Association

BC Road Builders  
and Heavy  
Construction Association

BC Sheet Metal  
Association

BC Structural  
Movers Association

BC Wall & Ceiling  
Association

Canadian Home Builders'  
Association of BC

Canadian Masonry  
Contractors Association  
BC/Yukon Chapter

Canadian Steel Service  
Centre Institute

Construction Labour  
Relations Association

Electrical Contractors'  
Association of BC

Glazing Contractors  
Association of BC

Independent Contractors  
and Businesses  
Association of BC

Master Painters &  
Decorators Association  
of BC

Mechanical Contractors  
Association of BC

Mobile Crane Owners  
Association

Roofing Contractors  
Association of BC

**Mr. David Young  
Policy Director  
Policy & Regulation Development  
WCB**

**BY FAX**

**April 3, 2003**

**Dear Mr. Young:**

I am writing on behalf of COCA to provide our response to the proposed changes to the WCB Occupational Health & Safety Regulation (OHSR). COCA represents 21 construction associations in BC and acts on behalf of the construction industry with regard to WCB matters. There are about 4,000 contractor members of COCA and they do about 90% of the value of all construction done in BC - about \$16 billion per year.

I have divided our comments into three areas, as follows.

**NUMBER 1: ELIMINATION OF DUPLICATION.** We support this proposal to streamline the OHSR by eliminating needless duplication of requirements. It will reduce the bulk of the regulation somewhat. More effort is also needed along this line to make the OHSR easier to understand by both workers and employers.

**NUMBER 2: USE OF STANDARDS DEVELOPED BY THE AMERICAN CONFERENCE OF GOVERNMENTAL INDUSTRIAL HYGIENISTS AND THE INTERNATIONAL AGENCY FOR RESEARCH ON CANCER.** We generally support this move but we have several key recommendations for improving your proposal.

First the concept of requiring chemicals to be As Low As Reasonably Achievable (ALARA) should be deleted completely from the OHSR. No other jurisdiction attempts to enforce ALARA for chemical substances. The other ACGIH standards and WHMIS already protect worker health.

Second, the WCB plan of adopting the ACGIH standard "as amended from time to time" should be deleted. This is important because any change to the WCB regulation should be the subject of a Public Notice and Public Hearings, as required by the Workers' Compensation Act. British Columbia should not be adopting standard changes that have not been considered by BC stakeholders.

Third, all Threshold Limit Values (TLVs) should be available through the WCB website for ease of reference.

**NUMBER 3: MOVE TO PERFORMANCE BASED FIRST AID REGULATIONS.** We support this change, which will provide greater flexibility for the employer to achieve the proper level of first aid services. There should also be a greater recognition of emergency services (fire and ambulance) as being available to provide first aid care to injured workers. The role of industrial first aid should be to stabilize the injured worker until emergency services arrives, not to attempt to duplicate these specialized services.

Thank you for the opportunity to comment. Please contact me if you wish to discuss any of these issues.

Sincerely Yours,



Grant McMillan  
President

cc: Honourable Graham Bruce