

W1035 -



I.W.A. CANADA
 LOCAL 1-80 C.L.C.
INDUSTRIAL WOOD & ALLIED WORKERS OF CANADA

PHONE: 746-6131
 245-2612
 479-1675
 FAX: 746-1012
 E-mail: iwa@cowichan.com
 351 BRAE ROAD
 DUNCAN, B.C. V9L 5T9

March 4, 2003

Workers' Compensation Board,
P.O. Box 5350, Station Terminal
Vancouver, BC V6B 5L5



Att: Dave Young, Policy Director
Policy and Regulation Development Bureau

Dear Sir: *

I am writing to you with great concerns. I have just received the proposed regulation Part 33, (Occupational First Aid), in which I read that first aid coverage will be left up to the employer to determine.

We also reject the deletion of A.B.C. hazard in Section 3.1 (Rights and Responsibilities). Most of my members work in the forest industry, many of them are loggers. In the logging industry travelling to a hospital can be quite a distance. We rely heavily on our First Aid attendants, but as you know having first aid attendants costs money. In most of our larger firms we have good first aid coverage, but the companies have been trying to cut corners on coverage. This regulation will definitely help them. I believe the Regulations are supposed to help the worker, don't you?

In today's logging world we have hundreds of people working in isolation. Some of my members have told me they are uncomfortable being out there by themselves but because there is a first aid attendant close by they have some relief. On average the logging industry kills 28 people a year and hundreds of lost time incidents, and we have strict regulations and requirements for first aid coverage.

Can you imagine if the proposed Regulation goes through? At the last four I.W.A. Conventions we have put motions forward that strengthen the regulations not destroy them.

The industry has a clear track record when they are not forced to do something they don't do it. In our Local the companies have quite good first aid coverage but they are always looking at ways to take short cuts. This regulation will do just that.

March 4, 2003

W.C.B. Policy and Regulation
Development Bureau

I.W.A. Local 1-80 is opposed to the proposed change to Regulation Part 33, Occupational First Aid, Section 3.14 through to 3.21. We are also opposed to the regulation change to (Rights and Responsibilities), Section 3.1. and the deletion of "A", "B". and "C" hazard out of the regulation. We have worked with the W.C.B. for many years strengthening the regulations to help protect the men and women that work in our industries. In my view these changes take a step back in time, not ahead.

Once again, I am opposed to the proposed changes to the Regulation mentioned above.

Yours truly,

A handwritten signature in black ink, appearing to read 'Carmen Rocco', with a long horizontal flourish extending to the right.

Carmen Rocco
1st Vice-President.

CR/cr.