

March 26, 2003

W1039 Rec'd  
March 27/03



David Young, Policy Director  
Policy and Regulation Development Bureau  
Workers' Compensation Board  
P.O. Box 5350, Stn Terminal  
Vancouver BC V6B 5L5

Member of the  
Canadian Automobile  
Dealers Association

Dear Mr. Young:

I am writing on behalf of the BCADA to comment on the proposed changes to the WCB's Occupational Health & Safety Regulations.

We recommend that these changes go forward, with a significant difference, as noted below.

We are, first of all, encouraged by the effort to remove duplication and eliminate redundancy in the Regulation. It makes sense to state the requirement for worker training once rather than print the same requirement throughout the Regulation books.

Second, we agree with the proposal of using a common standard for determining the levels of chemicals that may safely be used in the workplace. The American Council of Government Industrial Hygienists is used elsewhere in Canada and seems a reasonable standard. However, we strongly suggest that any future changes to this set of standards be examined before it is implemented. Your proposal would see the WCB adopt any future changes to chemical levels without any public hearings. We think this is contrary to both the spirit and the letter of the law. Our recommendation is to advertise and hold public hearings for any future proposed changes to chemical levels.

Third, we are in favour of the move to performance based First Aid Regulation. This provides the employers with the opportunity of providing reasonable levels of first aid. The current system is too prescriptive and narrow. The new standard is more flexible and easier to understand.

Thank you for the opportunity of offering these recommendations.

Best Regards,

A handwritten signature in black ink, appearing to read "Glen Ringdal".

Glen Ringdal  
President & CEO  
BCADA – The New Car Dealers of BC.