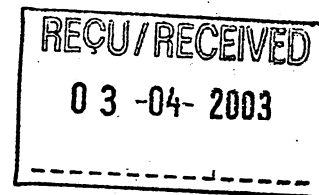


Ken F. Webb
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01 April, 2003
File: 4642-00

W1049



Roberta Ellis, Vice-President, Prevention Services
Worker's Compensation Board of British Columbia
Policy & Regulation Development Bureau
P.O. Box 5350 Station Terminal
Vancouver, B.C.
V6B 5L5

Re: Proposed Amendments to Occupational Health & Safety Regulations

Dear Ms. Ellis:

Roberta

This written submission is related to the proposed amendments to the Occupational Health and Safety Regulation occupational exposure limits, duplication and redundancy and occupational first aid.

BC Hydro supports the WCB proposed amendments to the occupational first aid requirements and intent to remove existing redundancy and duplication of requirements in the Occupational Health and Safety Regulation. We have previously commented positively on the WCB's intent to adopt the ACGIH TLVs in my letter to the Policy & Regulation Development Bureau dated 19 September 2002.

In principle we feel that the WCB is giving industry the necessary information while providing flexibility in maintaining a safe workplace. As the WCB continues to review and propose amendments for other parts of the Occupational Health and Safety Regulation, BC Hydro feels it is valuable to establish and develop employer guidelines and companion documents (similar to the draft First Aid guidelines) to ensure WCB officers and industry have a common understanding of the possible methods by which to meet the intent of the regulations. This may require further development of reference materials for other parts of the regulation.

We would like to see a transition period where industry has the opportunity to implement the necessary changes to meet the requirements of these amendments. (e.g. one year after adoption of the amendments).

BC Hydro is willing to participate in working groups with the WCB as the OHSR review efforts continue.

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In addition to the OHSR amendments, we feel it is essential to establish and recognize a single contact process for employers that span the entire province. It would be a benefit to employers as well as the WCB to establish a single Prevention Division industry contact to address key province wide issues that involve several WCB offices and officers. Currently there is no formal process, resulting in a potential for inconsistent application of regulations in different areas of the province. This single contact would have the authority to make decisions on safety related issues that have province wide applications. We also feel that this presents the opportunity for both parties to share information and concerns with respect to maintaining a safe and sustainable workplace.

We look forward to continued dialogue with the WCB. If you require more information or would like to discuss the issues identified in greater detail, please contact me at (604) 528-2903.

Sincerely,

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

Ken Webb

Cc: Doug Alley, Business Council of BC