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**BRITISH COLUMBIA
PUBLIC SCHOOL EMPLOYERS'
ASSOCIATION**

June 13, 2008

By E-mail: Two pages

Roberta Ellis
Vice-President
WorkSafeBC
PO Box 5350 Station Terminal
Vancouver, BC V6B 5L5

Dear Roberta:

I am writing in response to WorkSafeBC's proposed amendments to Part 17: Transportation of Workers in the *Occupational Health and Safety Regulation*.

The Issue

Our initial submission asserted that the amendments proposed to Part 17 exceeded the scope and the nature of the problem as declared by WorkSafeBC. Further, we asserted that WorkSafeBC had failed to provide any objective evidence in support of the inclusion of school buses, and in particular the inclusion of school buses when operated or arranged by a school or school district in British Columbia.

Through our evidence, we established that the regulatory amendments proposed by WorkSafeBC, as they pertain to school buses, are not required and, in fact, compromise the safety of the occupants of school buses.

BCPSEA Position

We support the goal of improving worker transportation safety in all sectors of British Columbia.

In furtherance of that goal, we support the current amendments as they seek to harmonize seat requirements and seat belt provisions in the Occupational Health and Safety Regulation with the Motor Vehicle Act Regulations.

January 30, 2008
Roberta Ellis
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Submission

We wish to thank WorkSafeBC and the Board of Directors for their time and careful consideration of our submissions. We recognize that WorkSafeBC has a difficult task to balance interests and issues in all employment sectors across British Columbia.

We support the current amendments that WorkSafeBC has proposed for Part 17. We believe these amendments have achieved the goal of harmonizing seat requirements and seat belt provisions in the Occupational Health and Safety Regulation with the Motor Vehicle Act Regulations. Furthermore, we are pleased that WorkSafeBC has recognized that the current design of school buses provides a high level of protection in the absence of seatbelts.

Thank you again for your time and consideration.

Yours truly,

Mark Grabas
Managing Consultant, Health, Safety & Wellness