



EMIL ANDERSON CONSTRUCTION (EAC) INC.

May 21, 2008

Ms. Anne Burch
Director, Prevention Policy & Regulation Review
WorkSafeBC
P.O. Box 5350 Station Terminal
Vancouver, B.C. V6B 5L5



Dear Ms. Burch,

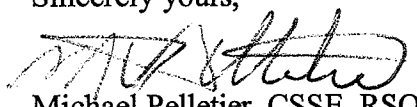
Thank you for the opportunity to respond to the proposals for the 2008 regulation review. In particular to the withdrawal of 14.63.1, which required the second braking system on the hoist drums of friction controlled Cranes. We are pleased that the board did in fact withdraw 14.63.1.

First of all the cost would have been prohibitive. We did an analysis of the cost to have a 2nd braking system installed and it would have run in the \$10,00.00 range per Crane. That is not acceptable.

Secondly and most important is there would have been no greater degree of safety achieved by having the 2nd braking system installed.

Again we thank you for listening to our recommendations, as it is extremely important to us. I am hopeful that WorkSafeBC will work hand in hand with the B.C. Association for Crane Safety to find the best practices for the Crane Industry.

Sincerely yours,


Michael Pelletier, CSSE, RSO
Manager, Loss Prevention & Safety
Emil Anderson Group