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LOCAL 115  
CRAFTSMANSHIP • RESPONSIBILITY  
SAFETY • TRAINING

### INTERNATIONAL UNION OF OPERATING ENGINEERS

LOCAL UNION No. 115-115A-115B-115C • AFFILIATED WITH A.F.L.-C.I.O.-C.L.C.

Gary W. Kroeker Business Manager Brad MacKenzie President

June 13, 2008

#### VIA FACSIMILE

Anne Burch  
Director  
Policy and Research Division  
WorkSafe BC  
PO Box 5350 Stn Terminal  
Vancouver, BC V6B 5L5

Dear Ms. Burch

#### Re: Regulation Amendments 2008

On behalf of the International Union of Operating Engineers Local 115, which represents approximately 10 000 members, I am writing in support of the B.C. Federation of Labour's submission on the proposed regulation amendments for 2008.

We support the Federation's recommendations and urge the WorkSafe BC Board of Directors to seriously consider and implement them. This is an opportunity for WorkSafe BC to fulfill their mandate to improve the health and safety regulations and thereby provide the workers of B.C. with greater protection.

We are pleased to have the opportunity to participate in this process.

Yours truly

Gary W. Kroeker  
Business Manager

GWK/wg



14.1

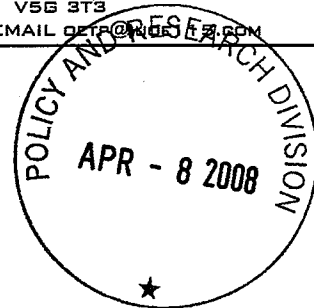
# Operating Engineers (Local 115)

## JOINT APPRENTICESHIP AND TRAINING PLAN

#300 - 4333 LEDGER AVENUE, BURNABY, BRITISH COLUMBIA V5G 3T3  
TELEPHONE 604 299-7764 • FACSIMILE 604 473-5237 • EMAIL [OETP@OESFBC.COM](mailto:OETP@OESFBC.COM)  
BRAD RANDALL ADMINISTRATOR

April 7, 2008

WorkSafeBC – WCB  
Policy and Research Division  
PO Box 5350, Stn Terminal  
Vancouver, BC V6B 5L5



Attention: Anne Burch  
Director, Prevention Policy and Regulation Review

Dear Ms. Burch:

**Re: Proposed Regulatory Amendment for Part 14: Cranes and Hoists**

*Operator's duties (14.37.1)*

*The operator of a crane, hoist or boom truck must have full control of the equipment controls whenever the hoisting equipment is in use, and engaged in no other duties while operating the equipment.*

On behalf of the Operating Engineers (Local 115) Joint Apprenticeship and Training Plan, I would like to express our support of the proposed regulatory amendment for Part 14: Cranes and Hoists in the *Occupational Health and Safety Regulations*.

The inclusion of this new section to Part 14 regarding Operator's duties addresses an experiential issue critical to the safety of workers on the job. Historically, both the Training Plan and Local Union of the Operating Engineers have supported regulatory amendments which advance construction safety, particularly as they relate to cranes and hoisting operations.

Once again we support this amendment and hope that it moves forward to enactment in the Regulations.

Regards,

Brad Randall  
Administrator

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LABOUR AND MANAGEMENT WORKING TOGETHER

