



July 12, 2007

Via E-mail: Regquery@worksafebc.com

WorkSafeBC
Prevention Policy & Regulation Review Department
Policy and Research Division
PO Box 5350 Station Terminal
Vancouver, BC V6B 5L5

Dear Sir or Madam:

RE: **Part 3: Rights & Responsibilities OH & S Programs**

I appreciate the opportunity that WorkSafe BC is providing the stakeholders in allowing input into proposed regulation changes, prior to making the final decision.

While I have no specific comments on the proposed changes to the above proposed amendments, I do have comments on the operational difficulties associated with the Part 3 regulations and particularly the provision of First Aid services.

The City of Port Coquitlam is a municipality of 28 square kilometers and six separate facilities, not including the parks and outdoor pool sites. The requirement based on the regulations requires us to provide Level II First Aid at our Operations Center and City Hall. The primary Fire Hall is right next door to the Operations Center, and 2.72 kilometers away from City Hall and has at any given day and time a minimum of 12 personnel trained as First Responders to a maximum of 16 during the day Monday to Friday. Additionally, we operate a second Fire Hall on the opposite side of the municipality which on any given day would have 4 First Responders available. Our Level II First Aid Attendants are stationed at our Operations Center and City Hall. The majority of our staff at the Operations Center on shift are working in the field at a variety of worksites and not at our Operations Center where the First Aid Attendant is located.

We have many of our staff trained to the basic level of first aid, however the numbers of staff that have accepted the role of being the Level II First Aid attendant have been diminishing over the years. At this point, we have one person that continues to accept the responsibility at our Operations Center, and when that person is away, we contract for the service. We have attempted on a number of occasions to generate interest in taking on the role, including increasing the stipend paid, to no avail. The question continues to be raised as to why the City is required to have and pay additional monies for first aid coverage for someone to be stationed at the Operations Center when the

Human Resources Division

2580 Shaughnessy Street, Port Coquitlam, BC, Canada, V3C 2A8

Tel: 604-927-5417 Fax: 604-927-5454

www.city.port-coquitlam.bc.ca

staff are deployed elsewhere, when there is a fully qualified contingent of First Responders that can cover the entire City; and can attend in a more timely fashion to incidents that may occur with our workers out in the field with equipment and resources that far exceed what our First Aid attendant has available to him/her.

I recognize the value and the requirement to provide first aid coverage and am a supporter of this being in the regulations, however, it would appear to me that there should be some latitude or process by which an equivalency be recognized or a variance obtained if the level of service that is being proposed meets or exceeds the regulation.

I thank you for your consideration and if there is a prospective resolution to my operational difficulties, I would appreciate a response.

Yours truly,

A handwritten signature in black ink, appearing to read 'Barbara Wilton', written in a cursive style.

Barbara Wilton
Manager, Human Resources

CC: CMT
File



July 9, 2007

Via E-mail: Regquery@worksafebc.com

WorkSafeBC
Prevention Policy & Regulation Review Department
Policy and Research Division
PO Box 5350 Station Terminal
Vancouver, BC V6B 5L5

Dear Sir or Madam:

**RE: PROPOSED AMENDMENT TO OHS REGULATION PART 4: GENERAL CONDITIONS,
WORKING ALONE OR IN ISOLATION**

The City of Port Coquitlam is pleased to comment on the proposed amendments to the Occupational Health and Safety Regulation. The City of Port Coquitlam does not fully support the proposed change to the Working Alone or in Isolation language in Part 4.

If the intention of adding "in ill health" is to include procedures for contacting assistance when workers that work alone or in isolation become ill during their shift and the change is as simple as that, then we are in support that change in 4.20.1 and 4.21 (1). The only cautionary note would be to consider those situations outside the normal practice, for example where a staff person is working after hours in an office setting where there is limited risk of a disabling injury there will not be a formal procedure in place to check in with the worker. Albeit, we do encourage employees to use the buddy system when available and publish tips on keeping safe annually. Alternatively, if "in ill health" is intended to mean something different than an unexpected illness, the City's response will undoubtedly be different.

We do recognize the need to address the late night retail business establishments and ensuring that workers of every age are protected to the best of the employer's ability, but in doing so, we need to be cognizant of potentially negative impacts of these changes to other employers not involved in retail operations. The City of Port Coquitlam continues to ensure worker health and safety through the current regulation language but does not support changes that are not within the employer's control and not workable or enforceable.

Yours truly,

A handwritten signature in black ink, appearing to read "Barbara Wilton".

Barbara Wilton
Manager, Human Resources

Human Resources Division

2580 Shaughnessy Street, Port Coquitlam, BC, Canada, V3C 2A8
Tel: 604-927-5417 Fax: 604-927-5454
www.city.port-coquitlam.bc.ca