



COMPENSATION
EMPLOYEES'
UNION

July 12, 2007

VIA FACSIMILE

WorkSafeBC
6951 Westminster Hwy
Richmond, BC
V7C 1C6

Dear WorksafeBC:

Our union which represents WorkSafeBC is writing to you in support of the B.C. Federation of Labour's submission on the current proposed changes to the **OH&S Regulation.**

We urge the Board of Directors to implement the recommendations as outlined in the Federation submission. We are pleased that the WCB is moving in the direction of providing workers with greater protection. Implementing the Federations' recommendations as well as enforcing the regulations will ensure that more workers will return home safe and healthy at the end of the day.

Yours truly,

Sandra Wright
President, CEU

SW/bjcm





Comments on Proposed Amendments to the B.C. Occupational Health and Safety Regulation

Submitted by:

Stan Reese, Business Manager

On behalf of the:

Compensation Employees' Union
#200-8120 Granville Avenue
Richmond, BC V6Y 1P3

Submitted to:

Workers' Compensation Board of British Columbia
Prevention Policy & Regulation Review Department
Policy and Research Division
P.O. Box 5350 Station Terminal
Vancouver BC V6B 5L5

Date:

June 28, 2007

Introduction

The Compensation Employees' Union (CEU) represents about 2,500 workers employed by the Workers' Compensation Board of British Columbia (the Board) in a broad range of occupations at its various locations throughout British Columbia. They include the prevention officers who carry out enforcement activities under the *Workers Compensation Act* and the *Occupational Health and Safety Regulation* (OHS Regulation).

This submission includes comments on the following sections of the OHS Regulation to which the Board is proposing to make changes:

1. Part 3, Rights and Responsibilities, relating to occupational first aid requirements
2. Part 4, General Conditions, relating to working alone or in isolation

1. Occupational First Aid Requirements

The CEU agrees with the prescriptive first aid regulatory requirements contained in section 3.16 (1.1) and (1.2) of the proposed amendments. The CEU supports these changes because they provide clear and concise direction to employers on their responsibilities to provide first aid services. It is unfortunate that it took the death of a worker and the subsequent inquest and coroner's recommendations to reinstate minimum first aid requirements in the OHS Regulation.

The CEU also agrees with the addition of section 3.17.1 (a) on air transportation. This new requirement will benefit workers in remote areas of the province. Because of their work locations, these workers are often in situations where adequate and initial first aid is not always readily available. Adding the requirement to ensure that appropriate aircraft are reasonably available to operations in these work locations will, in our view, go a long way in ensuring that medical aid is available when workers need it.

With regard to section 3.17.1 (b), including the requirement for the employer to develop a procedure to determine the availability of aircraft before the start of each work day operation not only creates an appropriate employer obligation, but should also have the effect of ensuring that the procedures regarding first aid and transportation are actually put in place. Similarly, the requirement to develop a procedure for the air service to notify the employer when a suitable aircraft is no longer available is also very important. These requirements for parallel procedures have the potential to save lives and prevent more debilitating injuries from occurring.

We also agree with the addition of section 3.17.1 (c) which requires a system to be in place that enables the pilot and the first aid attendant to have the ability to communicate at all times during the transport. The CEU endorses this system of communication as we believe that the first aid attendant has medical information

that will assist in the transport of the injured worker and that will potentially result in a less severe injury.

2. Working Alone or in Isolation

The CEU agrees with the proposed changes to Part 4 of the OHS Regulation.

The CEU is pleased that the Workers' Compensation Board has recognized the serious risk of injury to workers when they are working in isolation or working alone. It is not always apparent to employers or workers that the nature of employment can be a contributing factor to an increased risk of injury. This is the case where workers are working alone or in isolation.

We think the following proposed changes will make this part of the OHS Regulation more effective because they impose specific obligations on the employer:

- Section 4.20.2 (1) which requires that the employer identify any hazards to workers assigned to work alone or in isolation. Often new or young workers are not familiar with the potential risks to which they could be exposed
- Section 4.20.2 (2) which requires the employer to eliminate or minimize the risk from hazards

- Section 4.20.2 (3) which requires the employer to minimize the risks as much as is practicable using engineering and administrative controls.

The CEU also agrees with the proposed amendments in sections 4.22.1 (late night retail safety procedures and requirements) and 4.22.2 (mandatory pre-payment for fuel). We think these amendments will ensure the safety of gas station workers and late night convenience store clerks, many of whom are young or new workers.

The CEU particularly agrees with the inclusion of section 4.22.1 (3) requiring employers to train workers in the procedure for the safe handling of money. It is the employer's responsibility to ensure workers are trained and educated about the specific risks and hazards and the required response to these risks.