

## Neudorf, Leley

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**From:** on behalf of Regulation Review - External Queries (SM)  
**Subject:** FW: SPAM: Your submission has been received - #070502

-----Original Message-----

From: WorkSafeBC [mailto:prevweb@worksafebc.com]  
Sent: Monday, June 11, 2007 11:48 AM  
To:  
Subject: SPAM: Your submission has been received - #070502

Your submission has been received.

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Submission ID: P09.NZ6.552.1YW

Part 3: Rights and Responsibilities, relating to occupational first aid

1. Name: Denis McMullen  
Organization: D W McMullen & Associates Ltd Job Title: Managing Director  
(b) Feedback is provided: from an employer's perspective

2. E-mail:

3. Feedback:

Section #:Part 3.1 OHSR

Comments:I have discussed Part 3.1-3.3 with many of my clients and it seems the current layout is misleading.

The inclusion of 3.2 in its present place appears to indicate that a small operation has only to comply with points a) b)and c)as included in Part 3.2.

I appreciate that Part 3.3 goes on to outline program contents, but to the small employer these seem irrelevant as his(only)compliance requirements have already been outlined in Part 3.2.

In my opinion it would be easier for all to understand (and to comply with), if Worksafe's actual expectations were laid down in a more logical order.

Perhaps if Part 3.1 "When required" could be redefined and rewritten? Is it not the case that the only program component actually not required by small operations under the OHSR is the need for a Joint Committee?

Finally,the opening paragraph of Part 3.3 appears vague to the average Employer. The wording "without limiting the generality of the foregoing" surely the intention could be stated in an easier to understand manner and could be dispensed with entirely if Part 3.1 was redefined as discussed above.

Thanks

Thanks

Denis McMullen

4. Please indicate your level of support of the proposed amendments:generally agree

5. If you agree or disagree with the proposed amendments, please provide reason(s):

Section #:

Comments: