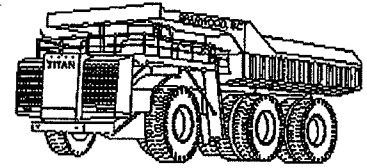




DISTRICT OF SPARWOOD

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HOME OF THE WORLD'S LARGEST TRUCK

June 27, 2007

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

Dear Sirs:

RE: Proposed Amendment to OH&S Regulation Part 4: General Conditions

The District of Sparwood is troubled by the proposed above amendment and therefore finds it necessary to comment.

The District of Sparwood does not support the proposed changes to the Working Alone or in Isolation Regulation because the definition of "to work alone or in isolation" is so all-encompassing that it would apply to every employee, in every workplace in the Province. The proposal to include "in ill health" as a criteria, makes the definition far too broad. I do not know of an employer who is able to predict or determine when an employee will be "in ill health". There are many employees existing in the current workplace who currently take medications to treat and keep their medical conditions under control. Most supervisors and managers are not aware of an employee's medical information and workers would need to disclose this medical information in order that appropriate controls could be put in place for any given circumstance.

We maintain our support for the existing regulation 4.21 (1) which provides a more workable framework for safeguarding the workforce with respect to Working Alone or In Isolation matters. The proposed 4.21 with the removal of "under conditions which present a risk of disabling injury...", would mean every employer in the province would need to create a written procedure for nearly every employee; this is simply not practicable or realistic. Some examples would be a secretary who is alone in the office over lunch time, or someone who arrives at the office earlier than everyone else, or someone who is the last to leave at night. In situations where there are no risks or extremely low risks of disabling

injuries due to the type of work, the employee could become ill with the "flu" and not be able to call for help.

The District of Sparwood takes employee health and safety seriously and it is treated as a very important matter, however, employers should not be held responsible for naturally occurring events or medical conditions which result in workplace incidents when they are not aware of and have no control over such conditions.

Written procedures should only be required when there is a reasonable risk of injury due to the job requirements. Every employee, working behind a closed office door could be at risk of ill health. The proposed changes are too broad to be workable or enforceable.

The remainder of the proposed changes do not apply to employers within the Local Government Classification Unit and are not commented on here.

Again, the District of Sparwood does not support this proposed amendment.

Yours truly,



Sandy Hansen,
Chief Administrative Officer