

6.5



2007 June 20

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



Dear Sirs:

Re: Proposed Changes to the WorkSafeBC OHS Regulations

The GVRD Labour Relations Department represents 15 Lower Mainland municipalities and the GVRD itself on matters related to labour relations, workers' compensation and associated employment issues.

Regulations 6.33 to 6.41 (Infectious Agents and Materials)

We wish to express our concerns with respect to draft regulations 6.33 to 6.41 (Infectious Agents and Materials).

These regulations appear to focus on the health care industry, but the regulations also apply to all industry. We support the concept behind the regulations – controlling future pandemics – but we recommend that the wording be re-drafted to make it less technical and more easily understood by employers and workers.

An online and printed brochure with easy to follow prevention steps would be very helpful.

These basic prevention steps are those that the Employer can introduce to stop the spread of disease – such as how to wash hands properly and how to avoid spreading disease by using appropriate cough and sneeze etiquette.

Regulation 6.39 – Vaccination Program

We recommend that proposed regulation 6.39 be clarified so that it becomes clear as to how the employer should implement the vaccination program required under this section with reads:

- “(1) An employer must offer vaccination against hepatitis B virus to all workers at risk of occupational exposure to that virus.
- (2) If the *Communicable Disease Control Immunization Program Manual* issued by the BC Centre for Disease Control, as amended from time to time, lists a vaccine that protects against infection by an infectious agent,

the employer must offer the vaccination to all workers at risk of occupational exposure to that infections agent.

- (3) Vaccinations offered under subsections (1) and (2) must be provided without cost to workers."

Municipal workers may come within the scope of this proposed regulation under various situations, including work with sewage systems, where workers may be exposed to the Hepatitis B virus.

We believe that it is important for the Employer to know how to satisfy this requirement. If, for example, the worker refuses the vaccination, will there be a requirement for the worker to sign off that they have been properly informed of their entitlement to the vaccination?

Regulation 9.18

We strongly support the proposed regulation change as contained in 9.18. This will recognize the special circumstances that exist within public water supply systems and the need for a qualified exemption to recognize these circumstances:

- "(2) Section 9:18(4) does not apply to water piping that is part of a public water supply system if the piping and associated equipment is designed, constructed, maintained and certified by a professional engineer to American Water Works Association standards or other standard acceptable to the Board.
- (3) Section 9.18(4) does not apply to a dam water passageway if the structures of the passageway, including a gate valve or other flow control device, are certified by a professional engineer as being safe for workers to enter to perform the intended work."

This change will eliminate the need for variances while providing the necessary clarity.

Thank you for the opportunity to provide our recommendations on these important issues.

Yours truly,



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cc: All Members of the Human Resources Advisory Committee

Caldwell, Virginia

Subject: FW: SPAM: Your submission has been received - #070502

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

From: WorkSafeBC [mailto:prevweb@worksafebc.com]
Sent: Friday, June 08, 2007 1:21 PM
To: rob.zimmer@gvrd.bc.ca
Subject: SPAM: Your submission has been received - #070502

Your submission has been received.

Submission ID: P09.NN6.SD2.DB6

Part 9: Confined Spaces, relating to isolation procedures in confined spaces

1. Name: Rob Zimmer, CRSP

- (a) Feedback is provided: on behalf of
Organization: GVRD Job Title: Safety Management System Supervisor
- (b) Feedback is provided: from an employer's perspective

2. E-mail: rob.zimmer@gvrd.bc.ca

3. Feedback:

Section #:9.18(1)

Comments:I think this is great change to Confined Space Regulations and should include the Waste Water side.

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: