

9.21(2)

To whom it may concern,

Recently the GVRD Employees' Union made an oral submission at a public hearing regarding Part 9 Confined Spaces, Lockout & Isolation exemptions as described in section 9.18 (1), (2), & (3). This written submission is in addition to that oral presentation.

We believe that the proposed changes will in effect usurp the workers right to refuse unsafe confined space work when it involves adequate isolation & lockout of a municipal water system or dam water passageway. That is because the proposed changes remove the current regulation to inform workers that double block & bleed cannot be achieved and that alternative procedures are in place and safe; as stated in BCOH&S Regulation #9.22 (2). If a worker is not made aware of the danger how can they refuse the unsafe work?

Our Union was not invited or contacted in any manner to participate in the development of these proposed regulatory changes. The high water pressures and volumes that our members work with on a daily basis present a significant hazard. GVRD workers will be affected by these changes more than any other workgroup in BC.

We put forward that the proposed regulatory changes should be not implemented until significant stake holders have had the opportunity to provide

meaningful input into the drafting of regulation that meets the needs of all those concerned.

Brian Northam  
GVRDEU Occupational Health & Safety Officer