

Mac's Convenience Stores Inc. A subsidiary of Alimentation Couche-Tard Inc.



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

Thank you for allowing us to share our concerns about the proposed amendments that affect our network of stores.

My name is Joy Powell and I am the Director of Operations for Mac's Convenience Stores in BC. With me today is Doug Hartl, Director of Security and Loss Prevention for Mac's Convenience Stores in Western Canada.

We are responsible for 60 Mac's stores throughout BC; 15 stores offer fuel and 56 stores are open 24 hours.

We operate our stores in partnership with independent dealers who oversee the day to day operations of the stores. Our dealers are small business owners that work in their stores between 5-7 days per week and average about 12 hours per day. You will hear from some of our dealers directly at several of these meetings throughout the province.

We are in support of a universal requirement for prepayment of fuel 24 hours a day.

The two concerns we have relate to the proposed regulations that require two employees between the hours of 10 pm and 6am and the late night retail safety procedures that require the construction of a barrier between the employee and the public.

The requirement of two employees during the designated late hours creates a financial hardship to our dealers and our business. The convenience store industry was built on being open 24 hours a day, 365 hours a year so that we can provide goods and services whenever the public needs them. The times specified are not the busiest times from a customer traffic standpoint and do not warrant employing two people during those times. In addition, the labor pool is so limited in BC that it is difficult for our dealers to staff their stores with one employee during those hours. Requiring two employees would be an extreme hardship.

The approximate costs to our dealers for another employee would be, at minimum \$23,000 per year but realistically closer to \$30,000 per year and would be a direct hit to their personal incomes. Many of them would not be able to sustain the impact of that large an expense.

The other amendment which requires a barrier between the employee and the public is impractical for our business as well. For a small kiosk fuel outlet whose primary business is fuel,

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this might be viable. For a 2500 sq. ft. convenience store that sells coffee, fresh food products, groceries, and beverages it requires an employee to be on the sales floor to prepare the products, clean and sanitize equipment and stock shelves. The hours between 10 pm and 6 am are traditionally the times when the overall store is cleaned and prepared for the next business day. The barrier would restrict an employee from completing the tasks necessary to operate the business efficiently. The installation of a barrier around the sales counter would be approx. \$35,000 per store or approximately \$2 million dollars for our 56 stores. It would be impractical to operate a convenience store of our size with barriers.

I believe the issue at hand is the safety of an employee during the late night hours. There are other more practical solutions that we have implemented over the years that minimizes the risk to our employees. Some of the solutions we have implemented include cash handling procedures, robbery prevention training, timed lock safes, low cash levels at night, extra lighting on the exterior and interior of the stores, CCTV's, limited signage on the front windows, a work alone policy and personal emergency call devices. We believe these tactics have a much stronger impact than installation of barriers and two employees on duty.

Doug Hartl will provide you with more information on our results with using these techniques in our BC stores and throughout Western Canada.

Thank you for your time.

Respectfully,


Joy Powell
Director of Operations, Mac's Convenience Stores
British
Columbia

