

Neudorf, Leley

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

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

From: WorkSafeBC [mailto:prevweb@worksafebc.com]

Sent: Wednesday, May 09, 2007 11:14 PM

To: oksafety@cablelan.net

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

Your submission has been received.

Submission ID: P09.KJ6.2X2.90D

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

1. Name: Steve Brown

(a) Feedback is provided: on behalf of

Organization: Okanagan Safety Systems & Solutions Ltd. Job Title: President

(b) Feedback is provided: from an employer's perspective

2. E-mail: oksafety@cablelan.net

3. Feedback:

Section #:3.16 and 3.20

Comments:A decision was made in 1999 to 2002 after consultation to go to a performance based regulation. I work with employers to help them understand how to implement the current regulations. The change is potentially to help the officers more than the employers because they are still insisting that the details of the old regulation (now found in the Officer Directives)be applied. This was one of the reasons why the old regulation was changed.

Why bring it back again? Why not provide better and simple information on how to provide the appropriate first aid supplies, equipment and personnel.

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

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

Section #:3.16 and 3.20

Comments:These changes are changing the performance based regulation to the old prescriptive one where the employer must provide all the details of supplies, equipment and personnel even if there are alternatives that met the performance based regulation. Instead of bringing back the old regulation (Section 33) more information and training should be provided to help educate the employers on how to meet the intent of the existing regulation.