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July 4, 2007

WorkSafe BC
Prevention Policy and Regulation Review
Policy Research Division
P.O. Box 5350 Station Terminal
VANCOUVER BC V6B 5L5

Attention: Ann Burch – Director

Dear Ms. Burch,

Proposed Amendments to the Occupational Health and Safety Regulations

We have reviewed the proposed amendments and have the following comments:

Section 3.7 Special Inspections

Clarification is required as to what constitutes a “special inspection” and whether or not operations will have to be shut down while the inspection takes place.

Section 3.9 Remedy without delay

Clarification is required as to what “without delay” means. The correction of an unsafe condition should be determined by a risk based assessment and corrective action taken in a prioritized manner.

Section 3.17 First Aid Procedures

We are not sure how this requirement can be met. We have a very mobile workforce and “posting” written procedures will not always be possible. In addition, when our members are working on an oil or gas lease or other facility, would it not be the responsibility of the owner or prime contractor to post the written procedures or otherwise ensure that workers are aware of the procedures?

Section 3.17.1 Air Transportation

On an oil or gas lease or other facility, it is the responsibility of the owner or prime contractor to ensure the availability of air transportation for injured workers. The word "employer" should be changed to "owner or prime contractor"

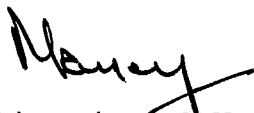
Section 4.21 Procedures for checking well-being of worker

A worker could be considered working alone when driving between the work site and home. The worker might not always be able to contact the office through cell phone and might not know how long a job might take. This will make it very difficult to establish a contact time. The section appears geared more toward static work sites and does not take into account typical job situations in the oil and gas industry.

Thank you for the opportunity to comment on the proposed changes.

Yours truly,

PETROLEUM SERVICES ASSOCIATION OF CANADA



Patrick J. Delaney, CRSP
Vice President, Health, Safety and Government Relations