



June 7, 2007

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

Dear Sirs,

**Re: Proposed Amendments for Part 4: General Conditions Section 4.1.1 to 4.1.2 in the *Occupational Health and Safety Regulation***

Silver Star wishes to modify the definition with which WorkSafe has used to define a Qualified Registered Professional (QRP) in assessing the terrain stability or avalanche hazard potential throughout a ski resort. Silver Star acknowledges that the risk of avalanches within BC ski resorts can be effectively controlled by assessments conducted "in-house" by the ski resort areas' own professionals.

Silver Star suggests that WorkSafe rescind its proposed definition of QRP indicated below...

**WorkSafe's proposed definition of QRP**

"...a professional engineer or professional geoscientist registered or licensed to practice under the *Engineers and Geoscientists Act* or a professional forester registered or holding a special permit to practice or a registered forest technologist registered to practice under the *Foresters Act*."

... and replace it with...

Revised definition of QRP

"A Ski Patroller, Safety Manager, Risk Manager, or similar ski area professional who has an appropriate level of qualification through training and certification from the Canadian Avalanche Association or equivalent credentials."


The QRP's indicated in WorkSafe's proposed definition do not have the necessary training in snow avalanche work to fulfill the role, as patrollers do. WorkSafe's proposed QRP's do not have the detailed knowledge and experience of the particular ski area as the resort areas' ski professionals, who have been doing avalanche assessments on a daily basis season after season. For instance, Silver Star Ski Resort currently has 5 certified Canadian Avalanche Association Level 1 technicians who have been practicing for up to 18 years at our resort. We have additional seasonal employees that also carry this qualification.

Our Ski Patrol Department conducts avalanche terrain assessment techniques in accordance with the Canadian Avalanche Association (CAA) Standard; including weather assessments twice daily and slope assessments on each run as required. It would be a needless waste of expense and duplication of effort, to hire a P. Eng., Geoscientist, or Forester, to tell us what we already know and practice according to the CAA Standard.

We whole-heartedly support the statements indicated by Jimmie Spencer, President and CEO of Canada West Ski Areas Association (CWSAA) and direct your attention to the CWSAA response letter dated January 23, 2007 for background information.

I look forward to your reply.

Sincerely,

  
Matt Robertson  
HR and Safety Manager  
Silver Star Ski Resort Ltd.