

Re: 2007 proposed amendments to the Occupational Health and Safety Regulation

To Whom It May Concern:

As the Local 1-405 Health and Safety Committee Chair for Tembec-Elko I would like to add to the support to the submission made by the USW District office in response to the proposed amendments to the Occupational Health and Safety Regulations. Our membership recognizes that the changes to the regulations are for the most part positive.

In particular I would like to point out the proposed regulation change:

Part 3 Rights and Responsibilities

3.16 Basic requirements

(1) The employer must provide for each workplace such equipment, supplies, facilities, first aid attendants and services as are adequate and appropriate for

(a) promptly rendering first aid to workers if they suffer an injury at work, and

(b) transporting injured workers to medical treatment.

Backup for absent first aid attendant

Absences from the workplace by first aid attendants may be planned (such as vacations or medical appointments) or unplanned (such as traveling with an injured worker to hospital or being absent because of sickness). Since it is foreseeable that planned and unplanned absences will occur, the employer will be expected to have a procedure for dealing with them.

Where planned absences may leave on duty fewer than the required number of attendants, the employer should have a substitute first aid attendant available as soon as the absence commences. With regard to unplanned absences, an absence of up to approximately half a shift is permissible until a replacement attendant is in place.

The proposed change will have a major implication on our members and workers in the community of Elko and the Tembec Elko Sawmill. As a mill in a small community that is 25 minutes' drive away from the Fernie Medical Centre and a further 50 minutes' drive to the East Kootenay Regional Hospital in Cranbrook, our many Level III First Aid Attendants not only ensure the care of our 200 workers at the mill but also frequently are the first responders to any vehicle accidents on Highway 3/95 near our mill as well as answering the emergency needs of the Elko citizens when called upon. The change in the guideline could result in less than adequate coverage for both workers in a dangerous industry and local citizens that depend on our First Aid Attendants.

Alternate shift schedules now define shifts from 8-12 hours, meaning that half of a shift could mean four, five or six hours, where there would be no First Aid coverage, which is completely unacceptable.

Please take these factors into consideration in your deliberations.

Sincerely,

Jeff Bromley
Tembec Elko USW Plant Committee Vice-Chair
Tembec Elko Safety Committee Chair
USW 1-405 Trustee