



June 22, 2007

Public Hearing Submission

Proposed Amendments for Part 14: Cranes and Hoists – OH&S Regulations

Nanaimo – Coast Bastion Hotel, June 19/07 – 3PM Session

Oral Presentation Notes

Presenters:

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Preamble:

Winroc is the leading supplier of building products to the wall and ceiling industry in North America. As such we operate a large fleet of delivery trucks, many of which include articulated knuckle-boom cranes. Familiarity and adherence to Crane Safety Regulations, is of prime importance to us and is one of the governing principles that we follow in our day-to-day business.

Here in BC we operate 12 branches with over 25 of these boom trucks, and some 150 staff members. We actively participate in Worksafe BC's "Focus on Safety" program, and have worked diligently to ensure that not only has safety become a cornerstone of our business, but that it has become an integral part of our corporate culture as well.

We applaud the effort that has gone into the work of rewriting these regulations, and welcome the opportunity to participate in the public hearings on the proposed amendments to Section 14. Hopefully, we can offer some constructive and sound input on these revisions from our perspective. Specifically, we would like to address the following items:



Section 14.38 (6)

Safe Lifting

We propose a modification (*in blue italics*) of the language of this sub-section to read as follows:

(6) If a crane or hoist is being operated at the same time and in the same location as other work activity, the employer *must provide a written safe work practice*, and the prime contractor must provide effective supervision of any persons who are not involved in that operation to ensure that the operation can be carried out safely.

The intent of this additional language is to provide a clearer distinction between the responsibilities of the employer and the prime contractor.

A written Safe Work Practice would ensure that a sound framework of tasks and responsibilities exists and is clearly understood, and will ensure that the crane/hoist operator can fully focus on the safe operation of the crane or hoist.

In addition, it will strengthen the stated objective of effective overall worksite supervision of all site activities by the prime contractor. The additional language will also limit the possibility of the shift of site supervisory responsibilities to the crane/hoist operator from the prime contractor.

Section 14.42.1 (1)

Critical Lifts

We propose a modification (*in blue italics*) of the language of the following sub-sections to read as follows:

(1) A written lift plan *or safe work practice* must be prepared for every critical lift and must be available at the worksite during the lift.

(3) At a pre-job meeting held before commencing hoisting operations for a critical lift, the lift plan *or safe work practice* required in sub-section (1) must be communicated to all people involved and the supervisor must document the meeting.

(4) The pre-job meeting required under subsection (3) must be repeated whenever there is a change in the people or equipment involved in the critical lift.

The intent of this language modification is to recognize the possibility that some employers may consistently and regularly operate within the parameters of a “critical lift” as defined in Section 14.1 of the OH&S Regulations. As such we submit that these employers may look to operate as though every lift is a critical lift; and the inclusion of a safe work practice dealing specifically with critical lifts, would ensure a systematic approach, and an easily repeatable method of addressing the entire process.

Section 14.45

Unattended Loads

We propose a modification (*in blue italics*) of the language of the following subsection to read as follows:

A load must not be left suspended from or supported by a crane or hoist when the operator is not at the controls, *unless the following criteria are met:*

- a) the load handling attachment is attached directly to the crane or hoist structure without the use of wire rope or sling*
- b) the crane or hoist is equipped with load holding capability in case of system failure*
- c) the crane or hoist is equipped with effective lockout capability*
- d) a safe work practice, that is acceptable to the board, has been developed and is implemented*

The intent of this addition is to recognize advancements in technology and principles of safe lockout procedures, which can be utilized to ensure the safety of the worksite. At present Winroc has submitted a variance application to the board that addresses these principles as well as the details of how that lockout process can and should work. For those details, we request that the variance application be reviewed.

We recognize that any load that is suspended or supported presents a significant hazard that must be controlled. It is our belief that with appropriate lockout procedures and advanced crane technology, this can in some instances, be accomplished without an operator at the controls, similar to what is presently allowed for variable reach lift trucks under section 16.37 - Securing elevated loads: An operator must not leave unattended any elevated load, part, extension or machine, unless it has been immobilized and secured against inadvertent movement.

Nevertheless, a load that is suspended from a wire rope is much more susceptible to wind forces than one that is on an attachment directly fastened to the end of the supporting structure, thus the exclusion of cranes or hoists where the load is suspended with a wire rope or sling.

Finally, we recognize the danger of simplistic safe work practices that do not adequately address all the issues of the work in question, therefore we recommend that the safe work practice utilized with this exemption, be presented to the board for approval before use.



Conclusion:

We trust that these comments provide a valuable perspective for on-going consideration as these regulations move from drafts to final documentation. Thank you again for the opportunity to be part of this process.

Regards,

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