

SUBMISSION

regarding

THE PROPOSED AMENDMENTS TO THE OCCUPATIONAL FIRST AID PROVISIONS IN THE OCCUPATIONAL HEALTH AND SAFETY REGULATIONS

Dated:

April 30, 2002

Introduction

The Pulp, Paper and Woodworkers of Canada (P.P.W.C.) represents 5,200 members in the province of B.C. The majority of them working in Class "A" hazard industries such as pulp mills, sawmills, re-manufacturing lumber mills, plywood mills, packaging and plastic manufacturing plants.

Nearly all of our forest industry related companies require a W.C.B. Level 3 First Aid Certificate for the type of hazards and risks involved in the manufacture of pulp & paper, lumber, and plywood.

Over the years our members have been use to a high level of care when they are injured on the job by their respective first aid departments. This is due in part by a high standard set by the W.C.B. through setting the course requirements, pass mark on written, oral and practical parts of the examination. Also, the certificate being issued by the W.C.B. upon passing the examination.

Proposed Changes

Under the proposed changes Level 2 and 3 examinations will be conducted by a person authorized by the Board and not by the Board. This in turn will allow the outside provider to do the scoring on each of the written, oral and practical portions of the examinations, 70% being the passing grade for each portion. The outside provider will issue a Level 2 or 3 Certificate and not the Board, upon a person completing and passing the examination.

The certificate and certificate endorsements will be recognized by the Board that is issued by outside providers.

Instructors for Level 2 and 3 and transportation endorsements will permit the Board to recognize instructors having qualifications issued by outside providers.

Submission_

The control of the examinations and the issuing of the certificates and certificate endorsement must stay under the Board's jurisdiction. The outside provider should not be involved in those requirements, as they have a vested interest in giving a passing grade and issuing a certificate to a person who would not normally meet the requirements under the present system.

The vested interest is the outside provider when putting on a Level 2 or 3 first aid course will be tempted to have a high pass rate and issue certificates to people who would not reach the normal 70% grade requirement in order to push more people through to increase profits and business.

A person seeking a Level 2 or 3 first aid ticket will go to the provider who will guarantee a ticket upon completion of the course and examination due to the high cost if that person is paying the course himself or herself.

The same outside provider could also set a standard for instructors that have a less than the normal 70% grade and become certified as an instructor. This will have the effect of lowering the standards set in a consistent manner by the Board and will put at risk patient care at a critical time. The issuing of the certificates by the Board is a measure of quality control keeping the present standards for first aid attendants universal throughout the province.

The irony of these changes is that under "**Section 33.30 ETV'S and Industrial Ambulances**" and if the first aid attendant is required to drive an emergency transportation vehicle (ETV) or industrial ambulance, he or she is required to hold a class 4 driver's licence issued by the Motor Vehicle Branch of B.C.

The licence and examination is controlled by the Motor Vehicle Branch and not by an outside provider such as a driving school.

The proposed amendments take away any control the Board will have on maintaining the standards of outside providers and will rely on their honesty in maintaining the correct grade when issuing a certificate after completing the course and in-house examination.

The only reason for the proposed amendments is to eliminate the duties of the W.C.B. First Aid Section of the Prevention Division and the need for the inspection officers at the risk of substandard treatment to injured workers.

There is no need to amend Section 33 to eliminate a department of the W.C.B. for perceived efficiencies when it increases the risk to an injured worker from receiving proper care.

Conclusion

The Pulp Paper & Woodworkers of Canada are opposed to the proposed amendments to the Occupational First Aid Regulations in Part 33 of the *Occupational Health and Safety Regulations*.