

SUBMISSION

regarding

THE PROPOSED AMENDMENTS TO THE OCCUPATIONAL FIRST AID PROVISIONS IN THE OCCUPATIONAL HEALTH AND SAFETY REGULATIONS PART 1

Dated:

March 27, 2003

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.

The proposed amendments from a prescriptive to a performance – based regulation is not needed and if implemented will give our members a lower standard of first aid care for the following reasons:

1. The repeal of Part 33 of the OHSR will, under Part 3, have no regulations that tells an employer what is necessary for first aid equipment, supplies, facilities and service of care, other than carrying out an assessment and using the Employers Guidelines.
2. By including the proposed regulations into Part 3 of the OHSR as a performance-based regulation, there is no requirement for the employer to follow the EMPLOYER GUIDELINES.
3. The guidelines also points out that the employer is not obliged to follow the recommendations in the Practice Guide and therefore the assessment becomes unenforceable by the WCB.

4. There is no requirement to include the worker health and safety representatives to participate with the employer in carrying out the assessment of levels of required first aid in their respective workplaces.

This will allow an employer to cut first aid services and manning with impunity and will have a direct implication on the level of patient care and response to our members who are injured at work.

5. The elimination of requiring first aid records be kept for 10 years and being replaced by 3.19 (2) requiring them to be kept for 3 years, will eliminate 7 years of history of exposure to hazardous chemicals and biological substances, that take years to manifest the long term health effects. This will make it difficult for a worker who is seeking compensation from an industrial disease to try and prove the relationship to exposure from a work place exposure incident recorded in first aid reports 10 years previously.
6. The review and expiry section 3.22 shows that the Policy and Regulation Development Bureau is not confident that Sections 3.14 to 3.21 will work properly and may need to be amended after June 15, 2008.

This begs the question why change the regulations in the first place.

Conclusion

The Pulp Paper & Woodworkers of Canada are opposed to the proposed amendments repealing the Occupational First Aid Regulations in Part 33 and include them under Part 3 as a performance based regulation of the *Occupational Health and Safety Regulations*.