

SUBMISSION

regarding

OCCUPATIONAL HEALTH AND SAFETY REGULATIONS REVIEW

TO THE PANEL OF ADMINISTRATORS POLICY AND REGULATION DEVELOPMENT BUREAU OF THE WORKERS' COMPENSATION BOARD

Dated:

August 7, 2002

We, the Pulp, Paper and Woodworkers of Canada (PPWC) believe that the Health and Safety Advisory Committee (HSAC) and Specialty Standing Committee were functioning well in coming to a consensus regarding changes to the present Occupational Health and Safety Regulations, and should continue that work.

The argument against this consultation model is only coming from the employer stakeholder groups who have seen the process becoming stalled and adversarial.

The Board's policy has now changed direction and is looking at the employer's costs and productivity in doing business rather than the first priority of protecting the health and safety of the worker.

Any changes to the Occupational Health and Safety Regulations should not diminish the protection afforded to the worker that is presently given under the present regulations. We do not see any statement to that effect in the proposals to changing the Occupational Health and Safety Regulations.

(c) Analysis by Regulation

When looking at Types 1, 2, 3, regulation and requirements, who will decide on the risk in the workplace and the appropriate control strategies? The answer to that question is the employer.

If it is deemed by the employer not to put in engineering and/or administrative controls to protect a worker(s) from a workplace hazard and instead use PPE for an entire shift, then that is what will happen.

If the proposed changes are relying control methodology being left to the employer and workers to determine, then the worker representatives on the Occupational Health and Safety Committee must be consulted first and have the right to refuse collectively.

APPENDIX B

Proposed Consultation

(a) Macro – level Consultation

(b) Sector – based Consultation

We feel that one consultation method should be used using the Policy Development Consultative Committee for all the changes to the Occupational Health and Safety Regulations.

We feel notification and input from various stakeholders is relying heavily on the Board's website and accessibility to the internet and will not be accessible to all the stakeholders.

(a) Public Hearings

We feel that the public hearings should include all the proposed amendments to the regulations and add a location by including the Vancouver Island Region.

APPENDIX C

Work Plan Prioritization

Phase 1

The adoption of Threshold Limit Values as recommended by the American Conference of Governmental Industrial Hygienists in place of Table 5-4 of the Occupational Health and Safety Regulations is wrong and we would be apposed to this.

Under the Regulation Advisory Committee (“RAC”) the Threshold Limit Values were researched and adopted from more than one agency, association or scientific body such as OSHA and other countries such as Scandinavia, that have more stringent levels that have been adopted in their countries and jurisdictions.

RAC recommended to and was adopted by the Board, Table 5-4, based on research and proven scientific data, using the **Lowest Threshold Level Values** that could be practically measured.

Thank you for the invitation to respond to the review process of the Occupational Health and Safety Regulations.