

SUBMISSION TO THE WCB PUBLIC HEARINGS

PROPOSED CHANGES TO THE OCCUPATIONAL HEALTH & SAFETY REGULATIONS

A submission by the
B.C. Federation of
Labour

May 29, 2006



INTRODUCTION

The B.C. Federation of Labour represents 550,000 union members who work in every sector of the BC economy in every geographical area of the province.

This submission presents the views of the Federation and its affiliates on the proposed amendments to the regulations before public hearing. The views were formulated through consultation and discussion with the members of the B.C. Federation of Labour Occupational Health and Safety Committee. Many of our affiliates will have made or will be making submissions as well, and will articulate the specific ways in which the proposed amendments would affect their membership.

Public Hearing Process

The Federation welcomes the opportunity to present to the Review Committee. As we began our research for this response, we became aware that for the most part, there was very little consultation prior to the proposed amendments being made available to the general public. While one might welcome what might be regarded as completely transparent process, one might also offer that the drafting of the regulatory language might have suffered for not having involved stakeholders in the development of the proposed amendments. We also found that some stakeholders, from both labour and management were not aware of the changes being considered. Those stakeholders only became aware of the proposed amendments when we asked for their considered input into this response.

The Federation is of the opinion that tri-partite meetings would result in not only better drafting of regulatory language, but would likely result in greater stakeholder awareness. The opportunity for dialogue between stakeholders is always beneficial especially when the result finds the confluence of ideas that benefit the health and safety of workers.

We understand that in at least one instance leading to this regulatory review, there was direct consultation with representatives from the employer community. We appreciate that on occasion there may be some need for the Board to meet with one group in the absence of the other. However, when the Board meets with one group and denies the other group desirous of the same opportunity, based solely on the

inability of the Board to bring both groups together, we find the response incomprehensible. Unions, management and the Board have collaborated in the development of regulations, which impact on the working conditions and lives of British Columbians. The dialogue that ensues from the collaborative effort has resulted in a better understanding of the requirements in the workplace. For the Board to turn away from an inclusive consultation process is very troublesome.

Another area of concern the Federation needs to address is that of how the regulations are selected for review. We are certain that WorkSafeBC does not employ some arbitrary method for regulation review. However, we are not certain what event(s) effect a review of a specific regulation. Does the Board consider the number of deaths and or number of incidents in a particular industry when determining regulation review? Would the severity of injury or the sudden increase of injuries in an industry be cause for review? Could it be that a number of employers seeking a variance to a regulation might cause the Board to consider a review?

Last year, 188 workers lost their lives due to workplace incidents or exposures. On behalf of those workers and perhaps more importantly, on behalf of their families and worker colleagues, we ask the question “What events trigger regulation review?” If we are to attempt to make the workplace safer for all workers, we need to examine the events that compel the Board to review the regulations that are not sufficiently safeguarding workers.

We recommend that WorkSafeBC return to tri-partite consultation in advance of preparing draft language for regulatory review.

As noted previously, the B.C. Federation of Labour consulted with affiliates regarding the proposed regulatory proposals. In some instances, consultation was extended to employer and occupational health and safety consultants familiar with activity for a specific industry.

Our consultation resulted in the following recommendations that we will enumerate in sequential order by part.

Part 4 General Conditions

4.3 Safe machinery and equipment

The proposed change will permit an employer/contractor to use generic replacement parts rather than the manufacturers' replacement part.

If an after market provider is able to supply a less expensive replacement part for a name brand product, the after market provider should be compelled to list on their packaging the specific part it is designed to replace. Appropriate labeling would ensure the generic replacement part has been tested and suitable for use in the original manufacturers' product. In the absence of appropriate labeling, after market, generic replacement parts should not be used.

While this proposed amendment is specific to the use of after market replacement equipment for "tools, machines and equipment," we are concerned the term "equipment" is far too nebulous. Does this proposed change in regulation extend and therefore apply to Personal Protective Equipment (PPE)? If PPE is to be included in this sweeping amendment, then all the more reason appropriate safety labels (MSH/NIOSH) need be on the packaging materials for the replacement part.

Recommendation:

When using generic replacement parts, the manufacturer of the generic part must label the part as being appropriate for use with specified equipment.

Part 5 Chemical and Biological Substances

5.49 Excursion limits

The proposed amendment is to reinsert the words "is provided only with" to the regulation. The intent of the proposed change is to ensure a worker is not exposed to a very high concentration of a chemical or biological substance

over a short period of time even though the time weighted average is acceptable over an eight-hour period.

The language of the proposed amendment is seemingly as clumsy as is the existing language. In a previous regulation review, the very phrase “is provided only with” was deleted in favour of the word “has.” Perhaps the Workers’ Compensation Board (WCB) drafters need another attempt at clarifying the language, so that in a future review we are not going to propose the deletion of the phrase “is provided only with” to return to the word “has.”

If there is confusion or ambiguity over the recent use of the phrase or a particular word, then rework the language to make certain workers are not subjected to exposures to “...all substances with eight-hour time weighted average limits, regardless of whether or not they have short-term exposure limits or ceiling limits.”

We understand the intent of the regulation, but the language is not yet specific enough for clarity.

Recommendation:

WorkSafeBC coordinate a tri-partite meeting of stakeholders to consider clear and concise language, appropriate for excursion limits.

Part 6 Substance Specific Requirements

6.33 Definitions

6.36 Control Procedures

The intent of the proposed amendment is to make mandatory in all workplaces the use of safety-engineered hollow-bore needles to access a vein or artery.

There are a number of concerns regarding the proposed amendment according to Health Care Unions. First, the proposed amendment covers only vascular hollow-bore needles and only 30 percent of stick injuries come from vascular needles. The remaining 70 percent of injuries are from intra-muscular needles, sub-cutaneous needles, scalpels, sutures and other medical sharps. Safety needles

are effective in reducing overall costs and have saved money for organizations that have implemented their use.

If a worker receives a time loss injury, the average cost to the WCB is \$6,000, not including prophylactic drugs. (This cost does not take into account the personal cost to the worker.) Even if a worker does not contract a transmitted disease, some workers will become sick and have a time loss due to the use of prophylactic drug treatment.

The second expressed concern of Health Care Unions is the timeliness of the proposed regulation. The regulation will not come into effect until January 2008. The delay in implementation is far too long. While 70 percent of injuries from needle sticks occur to nurses, one-in-five injuries in the hospital did not occur to the original user of the sharp devices. An earlier date for implementation of safety engineered needles would most reduce, if not eliminate injuries to secondary handlers of the sharps device. The elimination or reduction of injuries is not only cost savings for the WCB and the industry, but more importantly is harm reduction for the workers in their exposure to diseases transmitted by blood and body fluids (over 33 including HIV, Hepatitis B and C).

The BC Nurses Union submitted a paper on the aforementioned material. The B.C. Federation of Labour is supportive of all recommendations made by the BCNU. To underscore the significance of the BCNU recommendations, we include the BCNU recommendations as part of this submission.

Recommendation:

1. The Regulation Review process formally incorporates requirements for meaningful consultation with all stakeholder groups including workers' representatives
2. The referral of issues to regulation review resulting from current workplace practices, technological advances and other changes affecting occupational health and safety and occupational environment must take place on a timelier basis.

3. The proposal for Excursion Limits under section 5.49 be amended to ensure no limits exceed three times the 8-hour TWA limit for more than 30 minutes during the work period, and five times the 8-hour TWA at any time.
4. The proposed section 6.36(1.1) be amended to require the use of safety engineered medical devices (SEMDs) wherever a medical sharp is used.
5. There be a hierarchy of controls for the selection of SEMDs that requires the highest priority be placed on the selection of devices that provide the highest degree of protection from injury.
6. There be a requirement to select SEMDs in consultation with the joint occupational health and safety committee or worker representative and the users of the devices.
7. There be a requirement to log medical sharps injuries.
8. The effective date of the Part 6 changes be no later than January 1, 2007.

Part 9 Confined Spaces

9.11 Hazard Assessment and Work Procedures - Qualifications

The intent of the proposed amendment is to have a person qualified in confined space hazards write the entry into the confined space procedures. The WCB acknowledges that holders of CIH and ROH designations may have training in occupational hygiene without having experience in confined space entry work. Likewise, holders of CSP, CRSP or P. Eng may have experience with confined space entry work, but not in occupational hygiene. The amendment attempts to correct the inconsistency.

Section (2)(a) adds all the language that was in (2)(b), but deletes the word "entry" and substitutes the word "hazard" – this simple change could be very problematic. What is the difference between "entry" and "hazard" and why was the word entry deleted? Should the proposed amendment be

adopted, a person designated as qualified to assess confined space hazards could write the procedures for entry into the confined without knowledge about ingress and egress from the very space where they identified certain hazards.

The second paragraph of the explanatory notes rightfully points out there are differences between having knowledge of hazard and that of having knowledge of entry, but the proposal removes from regulation the word “entry” which may create a more significant problem than the one the proposed amendment attempts to correct.

Recommendation:

The word “entry” should be added so that (2)(a) reads:

“(2) For the purposes of subsection (1)(a) qualifications which are acceptable as evidence of adequate training and experience include:

(a) certified industrial hygienist (CIH), registered occupational hygienist (ROH), certified safety professional (CSP), Canadian registered safety professional (CRSP) or professional engineer (P.Eng), provided that the holders off these qualifications have experience in the recognition, evaluation and control of confined space hazards *and entry*, or....”

9.18 (2) & (3) Confined Spaces - Lockout and Isolation

The proposed amendment would allow a worker to enter a confined space when adjacent piping containing a hazardous substance can be controlled. The current regulation requires any hazardous substance in adjacent piping greater than 15 psig to be depressurized.

The WCB believes pressure at 15 psig to be artificial. If that is in fact the case, why was 15 psig set as a standard initially? Is it safe for a worker to enter a confined space when the pressure in adjacent piping is at 20 psig or 30 psig? There needs to be better clarification for the absolute

number. At what measurement is psig no longer artificial but dangerous?

Recommendation:

WorkSafeBC reconsider appropriate pressure levels when workers will not be allowed to access a confined space.

9.22 (1) Alternate procedures

With this proposed amendment, the WCB is seemingly prepared to allow a worker to enter a confined space when it is possible but not practicable for a contractor or owner to make a confined workspace safer.

The current regulation reads “if isolation using the measures specified in section 9.18 is not possible, the employer may implement alternate measures if acceptable to the Board...” The use of the word “possible” means that an employer must at least try to make the work environment as safe as possible before seeking permission from the Board to use an alternate measure.

The proposed change “if isolation using the measures specified in Section 9.18 is not practicable, the employer may implement alternate measures acceptable to the Board.” The change means that an employer may do something that is easier for the worker to access confined space, not necessarily safer for the worker.

The proposed change does require the contractor or owner to implement an alternative measure that is acceptable to the Board, **BUT** at what point will an employer have to seek WCB permission to employ alternate measures? If, for example, a company/contractor has set a precedent for confined space entry, are they grandfathered for all future work employing similar conditions?

Recommendation:

Section 9.22 remain in the present form so as to ensure the employer at the minimum, makes all possible attempts to provide safe access to a confined space for workers exposed to the hazard

Part 13 Ladders, Scaffolds and Temporary Work Platforms

Section 13.23 Testing

Current WCB regulations require self-propelled, boom-supported elevating platforms to be inspected annually “in accordance with good engineering practice.” In the 10th year after the date of manufacture and every five years thereafter, the inspection is to include a structural inspection to ensure the platform still meets the standard for safe use.

Equipment manufacturers have established service schedules independent of WCB regulations. Manufacturers service schedules can be more demanding and prescriptive than WCB regulation.

The proposed amendment will eliminate the need to have a structural inspection after the 10th year and every subsequent five years. Based on industry experience, the WCB is of the opinion that the annual inspection will suffice, as machines that are subject to heavy use will be inspected more frequently than machines that are seldom used.

The Federation is aware that a tear down after 10 years is too arbitrary especially when some equipment is constantly used in an environment that requires more frequent servicing attention. Similarly, other equipment may be used in a clean warehouse environment by the same personnel for only a few hours a week. The conundrum then is this - in the absence of an arbitrary time-line for a structural inspection, when should a structural inspection take place? What, in an annual inspection or in normal operation, will trigger the need for a more comprehensive structural tear down inspection and what role, if any, would the WCB have in enforcement?

Recommendation:

WorkSafeBC convene a tri-partite meeting of stakeholders to consider appropriate timelines or other triggering indicators that would initiate a tear down of the equipment.

Part 14: Cranes and Hoists

Section 14.91 Hoisting Ropes

This proposed amendment categorizes technologically improved tower crane rope (14 or more outer strands or a rope with a plastic coated inner core) from older hoisting rope. Older rope had to and will still be required to cut 10 feet of rope from the dead end every 3 months. The proposed amendment also deals with the timeline of three months proposing a change to every 500 hours. (Normal usage over 3 month period at 40 hours per week.)

This proposed amendment is an improvement on the existing regulation.

Recommendation:

The Federation supports the proposed regulatory change.

Part 18 Traffic Control

This is a complete rewrite of the Part.

Traffic Control Person (TCP) training will be set out as a regulatory guideline and included in the Part at 18 (4). This is a positive amendment to the rewrite of the Part.

Personal Protective Clothing and Equipment is now better defined and included in the Part at 18 (9) and (10). This too is a positive amendment to the rewrite of the Part.

The most significant change to the rewrite is with respect to what is in the current regulation as the mandatory use of TCP's as opposed to the permissive use (or even prohibited use) of TCP's in the proposed amendment.

Current regulation reads:

18.5 (1) Except as permitted by subsection (2) traffic control persons must be used when any of the following conditions prevail:

- a) Traffic is required to pass a worker, equipment or other obstruction, which may block all or part of the travelled roadway;
- b) Workers or equipment are employed on the travelled way over the brow of a hill, around a sharp curve, or at any other location where sight distance is not adequate for oncoming traffic to have adequate warning of their presence;
- c) It is necessary to institute a one-way traffic system through a construction zone where traffic volumes are heavy, approach speeds are high, and a traffic signal system is not used;
- d) Construction vehicle traffic is not coordinated with an existing traffic control system or an existing traffic light system is not adequate to regulate traffic, or the work encroaches into an intersection so as to interfere with regular traffic movement;
- e) Traffic speed or volume is a hazard to workers while setting up or removing other traffic control devices;
- f) Other traffic control devices are not available for emergency protection; and
- g) Workers are not adequately protected by other traffic control devices.

(2) The requirements for traffic control persons may be waived where:

- a) Adequate protection for workers is provided by other traffic control devices or procedures, or
- b) Circumstances allow self-regulating single lane traffic controlled by signs as specified in the Traffic Control Manual.

The proposed amendment reads:

18.6 (1) A traffic control person may only be used:

- a) If the use of signs and other traffic control devices and procedures alone cannot provide effective traffic control; or
- b) During emergency or brief duration work if it is not practicable to control traffic with signs and other devices and procedures.

(2) Without limiting the generality of Subsection (1), one or more traffic control persons must be used if:

- a) It is necessary to institute a one-way traffic system by or through a work zone and the circumstances do not allow self-regulating single lane traffic controlled by signs and other devices as specified in the Traffic Control Manual, and a traffic signal system is not used;
- b) Work-related traffic cannot safely self-regulate to move in or out of the work area or safely coordinate with other traffic;
- c) An existing traffic control system, or an existing traffic signal light system is not adequate to regulate traffic;
- d) The work encroaches into an intersection so as to interfere with regular traffic movement;
- e) Traffic speed or volume is a hazard to workers while setting up or removing other traffic control devices; or
- f) Other traffic control devices are not available in an emergency situation.

The proposed 18.6 (1) is entirely permissive.

Subsection (2) (a), (b) and (c) are permissive and would likely become the practice rather than the exception for most circumstances.

Subsection (2) (d) is explicit in that a TCP must be used if work encroaches into an intersection and interferes with regular traffic.

Subsection (2) (e) is explicit but only applies to the use of a TCP while setting up or removing signage and devices when speed or traffic volume is high.

Subsection (2) (f) is explicit but relates only to emergency situations.

Traffic volumes are not likely to change. Driving conditions are, in fact, becoming more difficult as volume increases and drivers attempt to navigate through challenging conditions that are exacerbated by other drivers talking on cell phones, drinking beverages, and other distractions too numerous to mention. Limiting or eliminating the proper employment of TCP's is going to endanger work crews and public safety.

Drivers are too often preoccupied with distractions. TCP's often capture drivers' attention by way of movement (waving signs), blowing whistles and actual traffic direction. Construction and maintenance road crews and utility service personnel work in a dangerous environment made safer by the employment of TCP's. The proposed permissive use of TCP's will place all workers having to work in proximity to high speed or high volume traffic in grave danger.

The B.C. Federation of Labour understands that TCP work is extremely dangerous and we know their safety is of paramount importance to WorkSafeBC. We also know that without TCP's doing their job, the danger and potential injuries to other workers would increase exponentially. Rather than increase the danger to other workers working in high speed/volume traffic by limiting the use of TCP's, we believe driver awareness and responsibility needs be elevated. We believe the penalty for disobeying the direction given by a TCP should increase substantially from the current level ("fines double in construction zones") to licence suspension. While we know this proposal is outside the

mandate of WorkSafeBC, we believe the government should amend the appropriate legislation to allow for the suspension of a driver's licence in the event of injury or death of a TCP.

Recommendation:

1. The B.C. Federation of Labour is concerned about the lack of consultation with stakeholders regarding this complete rewrite of Part 18. We recommend WorkSafeBC convene a tri-partite meeting of the stakeholders to consider this entire Part.
2. The Federation recommends WorkSafeBC initiate discussion with ICBC to develop a public awareness program to inform and educate drivers about the importance of obeying TCP directions.
3. The Federation recommends WorkSafeBC lobby the provincial government to amend the appropriate legislation to allow for the suspension of a driver's licence in the event of injury or death of a TCP.

Part 20 Construction, Excavation and Demolition
Section 20.4 Safe access

This proposal requires owners/contractors to arrange suitable access for the safe delivery of equipment and materials to the location in the workplace where the equipment and materials will be used.

This is a positive proposal that should reduce the number of strains workers suffer.

Recommendation:

The Federation supports the proposed regulatory change.

Part 23 Oil and Gas
Section 23.14 Pumps

The intent of the amendment is require a down-hole pressure relief device (positive displacement pump) on a non-pumping wellhead while being serviced or

decommissioned. (The amendment is in response to the fatal injury to Ryan Stand in 2003.)

Under current regulation, non-pumping wells, when being serviced or decommissioned, do not require to have a pressure relief device. (Pumping wells are determined to be a defacto valve.) Pressure can increase while the well is being serviced or decommissioned. Enough pressure will cause an explosion. The proposed regulation will require a “down-hole positive displacement pump, to prevent the pump from causing pressures that exceed the pressure rating of the system.”

This proposed amendment, according to WorkSafeBC Inspection Officers will make the servicing and decommissioning of non-pumping wellheads much safer.

Recommendation:

The Federation supports the proposed regulatory change

Part 24: Diving, Fishing and Other Marine Operations Fishing Operations

Section 24.93 Requirements for sensors and alarms

The proposed amendment would require an audible marine grade carbon monoxide sensor/alarm to be installed in crew quarters.

This is a positive amendment to protect workers from overexposure to carbon monoxide.

Recommendation:

The Federation supports the proposed regulatory change.

Section 24.104 (Drums) and 106 (Work Areas)

The intent of these two regulations is to prevent a worker on a herring gillnet from suffering unnecessarily from strains and becoming entangled in the net when the net is being hauled on board.

The herring fishery has adopted drum operated gillnetting similar to the salmon fishery. The proposed regulation attempts to put two (2) safeguards from the salmon fishery in place for the herring fishery.

The first safeguard requires the gillnet vessel to have an effective ratchet device to pick up the net under heavy strain. The second safeguard is somewhat more complicated in application.

In the salmon fishery, workers use a hold-to-run device that allows the worker to frequently start and stop the drum to disentangle the salmon. In the event the worker became entangled in the net, they would be pulled away from the hold-to-run device thus causing the drum to cease operation.

The herring fishery is different in operation, as workers do not need to frequently stop and start the drum. Using a hold-to-run switch would contribute to other ergonomic issues. Thus the proposed regulation stipulates that in the event a worker cannot use a hold-to-run control, an equally effective safeguard to stop the drum must be in place.

These proposed amendments to the regulations are positive.

Recommendation:

The Federation supports the proposed regulatory changes.

Part 26 Forestry Operations

Part 1 Definition

Defines “hazard area” which, while self-explanatory, is fine.

Section 26.11 Dangerous Trees

The current regulation prohibits work in the hazard area of a dangerous tree when wind speed exceeds 20 km per hour. The WCB proposes to amend the wind speed allowance from the current 20 km/hour to 40 km/hour to be consistent with the training course material provided in the Wildlife/Danger Tree Assessors program.

The study recently completed for the Ministry of Forests and Range, Forest Practices Branch, cautioned of working around danger trees when wind speed exceeds 20 km/hour. Should the WCB want consistency between regulations impacting all forestry workers and the Wildlife/Danger Tree Assessors program (which is approved by the Board) then the Wildlife/Danger Tree Assessors program should be amended to 20km/hr making the forest more safe, rather than less safe for all workers.

Recommendation:

Retain the regulation as it currently exists. Amend the Wildlife/Danger Tree Assessors program to prohibit working around danger trees when wind speed exceeds 20 km/hour.

**SUBMITTED ON BEHALF OF THE B.C. FEDERATION OF
LABOUR**

JIM SINCLAIR
President

ANGELA SCHIRA
Secretary-Treasurer

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RECOMMENDATIONS

General

We recommend that WorkSafeBC return to tri-partite consultation in advance of preparing draft language for regulatory review.

Part 4 General Conditions

- 4.1 When using generic replacement parts, the manufacturer of the generic part must label the part as being appropriate for use with specified equipment.

Part 5 Chemical and Biological Substances

- 5.1 WorkSafeBC coordinate a tri-partite meeting of stakeholders to consider clear and concise language, appropriate for excursion limits.

Part 6 Substance Specific Requirements

- 6.1 The Regulation Review process formally incorporates requirements for meaningful consultation with all stakeholder groups including workers' representatives
- 6.2 The referral of issues to regulation review resulting from current workplace practices, technological advances and other changes affecting occupational health and safety and occupational environment must take place on a timelier basis.
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- 6.4 The proposed section 6.36(1.1) be amended to require the use of safety engineered medical devices (SEMDs) wherever a medical sharp is used.

- 6.5 There be a hierarchy of controls for the selection of SEMDs that requires the highest priority be placed on the selection of devices that provide the highest degree of protection from injury.
- 6.6 There be a requirement to select SEMDs in consultation with the joint occupational health and safety committee or worker representative and the users of the devices.
- 6.7 There be a requirement to log medical sharps injuries.
- 6.8 The effective date of the Part 6 changes be no later than January 1, 2007.

Part 9 Confined Spaces

- 9.1 The word “entry” should be added so that (2)(a) reads:
“(2) For the purposes of subsection (1)(a) qualifications which are acceptable as evidence of adequate training and experience include:

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- 9.2 WorkSafeBC reconsider appropriate pressure levels when workers will not be allowed to access a confined space.
- 9.3 Section 9.22 remain in the present form so as to ensure the employer at the minimum, makes all possible attempts to provide safe access to a confined space for workers exposed to the hazard.

Part 13 Ladders, Scaffolds and Temporary Work Platforms

- 13.1 WorkSafeBC convene a tri-partite meeting of stakeholders to consider appropriate timelines or other triggering indicators that would initiate a tear down of the equipment.

Part 14: Cranes and Hoists

- 14.1 The Federation supports the proposed regulatory change.

Part 18 Traffic Control

- 18.1 The B.C. Federation of Labour is concerned about the lack of consultation with stakeholders regarding this complete rewrite of Part 18. We recommend WorkSafeBC convene a tri-partite meeting of the stakeholders to consider this entire Part.
- 18.2 The Federation recommends WorkSafeBC initiate discussion with ICBC to develop a public awareness program to inform and educate drivers about the importance of obeying TCP directions.
- 18.3 The Federation recommends WorkSafeBC lobby the provincial government to amend the appropriate legislation to allow for the suspension of a driver's licence in the event of injury or death of a TCP.

Part 20 Construction, Excavation and Demolition

- 20.1 The Federation supports the proposed regulatory change.

Part 23 Oil and Gas

- 23.1 The Federation supports the proposed regulatory change

Part 24: Diving, Fishing and Other Marine Operations

- 24.1 The Federation supports the proposed regulatory change.
- 24.2 The Federation supports these proposed regulatory changes.

Part 26 Forestry Operations

- 26.1 Retain the regulation as it currently exists. Amend the Wildlife/Danger Tree Assessors program to prohibit working around danger trees when wind speed exceeds 20 km/hr.

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