



August 26, 2021

Ms. Lori Guiton,
Director, Policy, Regulation & Research Division,
WorkSafeBC
email: lori.guiton@worksafebc.com

Re: Part 3: Minimum Levels of First Aid

Dear Ms. Guiton:

Thank you for the opportunity to comment on the Discussion Paper — regarding Part 3: Minimum Levels of First Aid.

I am responding on behalf of COCA, which represents 20 construction associations, with members from all parts of British Columbia, from every sector and from every size of company, both union and non-union.

COCA continues to gather responses on this important issue and we may submit additional comments and recommendations as provided by our members.

The proposed regulation changes deal with the requirements for first aid services under Low, Moderate and High hazard workplace situations. This is purportedly done in order to harmonize BC requirements with those developed by the Canadian Standards Association (CSA).

It is important to note that the CSA standards have no force of law in BC unless adopted into regulation by WorkSafeBC.

Also, there is little or no private sector involvement in the development of CSA standards. The people at the table are almost all from government ministries or agencies or from the CSA itself. This is a narrow range of input. The proposed changes to the Tables will confuse both workers and employers. We do not support the new Tables of requirements, including the proposed changes to the increased requirements for the number of First Aid Attendants under various conditions.

For example, the proposed increase for the category for 100-199 people on site if medical facilities is 20 minutes away from a medical facility. The current requirement is for 1 Level 2 First Aid Attendant. The proposed requirement is for 3 First Aid Attendants at Level 2.

There is no evidence presented that this requirement is justified by a current lapse in first aid service.

We strongly oppose this wholesale change in descriptions and requirements for first aid. What we have now works – so why change it and put everyone through a needless learning curve?

The adoption of a CSA standard make no sense for industry – especially the Construction Industry -- in BC. The CSA standard has little or no input from construction employers.

The existing First Aid standards have been in place for years.

During that time the safety culture has greatly improved. Equally important, the great advances in technology have resulted in better communication, equipment, and transportation. Workers are far better protected and served than they were even ten years ago.

The additional proof of the effectiveness of the current First Aid requirement is the reduction in the Construction Industry (and all Industry) of the Injury Rate and WSBC assessment costs. The effective delivery of first aid is a component of these improved results.

The new proposed Tables of requirements should be withdrawn and the existing Tables retained. Any of the proposed wording that refers to the new Tables or their contents should be deleted. The first aid require should continue to be described as Levels 1, 2 and 3.

We support the housekeeping wording changes to 3.1; 3.14; 3.16; 3.17;3.21; EXCEPT where there is a reference to the new Tables.

Thank you for consulting with us.

Sincerely Yours

Dr. Dave Baspaly
President, COCA