



March 23, 2010

Chair and Directors
BC Safety Authority
Suite 200, 505 – 6th Street
New Westminster, BC
V3L 0E1

Via Courier

Dear Chair and Directors:

I am writing on behalf of ICBA's electrical contractors about the process and decision making around BCSA's initiative to impose additional training and testing requirements on electrical Field Safety Representatives (FSRs) by 2011. ICBA is asking the BCSA Board to stop this unnecessary and unwanted increase in the regulatory burden.

The BCSA staff may claim industry support but its consultation process was fatally flawed for the following reasons:

- 1) Of the 15,000 registered field service representatives and hundreds of electrical contractors only 251 individuals participated.
- 2) The discussion paper used in the consultation process was woefully inadequate and misleading:
 - a. Did not quantify costs
 - b. Labour mobility issue was misrepresented
 - c. Misrepresentation of BC regulatory regime relative to other jurisdictions
 - d. No evidence to suggest more FSR training will change results

BC's electrical industry has an enviable record of worker and installation safety. It is one of the most heavily regulated trades in British Columbia. BCSA already stipulates the qualifications of those permitted to do electrical work and imposes staffing requirements on contractors. To add costs and regulations to an industry that is sufficiently regulated and performing exceptionally well is ill-advised and completely unwarranted.

The BC government has a long standing policy of reducing the regulatory burden on business. In these tight fiscal times it is especially important that regulatory costs be curtailed. It is very disconcerting that a public agency, although separate from government, would strike out on a course that is so contrary to the wishes of our elected representatives. It begs the question; "To whom is the BCSA accountable?"



Again, on behalf of the electrical industry in British Columbia ICBA urges you to refrain from implementing new regulations, re-evaluate the process by which this initiative was developed and re-consider the value of imposing more regulations on an industry that is working well.

Yours truly,

A handwritten signature in black ink, appearing to read 'Philip Hochstein'. The signature is fluid and cursive.

Philip Hochstein
President

cc. Premier Gordon Campbell
Rich Coleman, Minister of Housing
BC Electrical Contractors
Electrical Contractors Association of BC
BC Construction Association.
Harry Diemer, CEO, BC Safety Authority

