



April 6, 2010

Peter Cook, Chair
Board of Directors
BC Safety Authority
Suite 200, 506 - 6th Street
New Westminster, BC
V3L 0E1

Dear Mr. Cook:

Thank you for your prompt reply to my letter regarding the increase in the regulatory burden associated with the proposed new rules for FSR training. It was re-assuring to read that other options are being considered beside the expensive training proposal currently on the table. ICBA would like to hear more about the other options as soon as they have been developed so it can send them out to its electrical contractors for comment.

While I do appreciate your efforts to clarify BCSA's approach, it did raise a number of other issues:

- 1) The electrical industry does not deny that working knowledge of the electrical code is fundamental to safety. Our journeymen are among the best trained in Canada as our industry's exemplary safety record since the introduction of the FSR concept illustrates. The case has never been made that more training is now required.
- 2) Technically BCSA would be implementing a new policy rather than a new regulation but from the industry's point of view it is a distinction without a difference. It is added bureaucracy and a mandatory cost imposed on the entire electrical industry by a regulatory body. At least with regulation the political system can be held accountable for its action yet it is unclear to whom the BCSA is accountable.
- 3) The added FSR training does **absolutely nothing** to achieve compliance with the Trade Investment and Labour Mobility Agreement (TILMA). On the contrary, it will frustrate TILMA's goal of labour mobility as those tradespeople coming from Alberta will now have an additional regulatory hoop to jump through and does nothing to aid BC tradespeople wanting to ply their trade in Alberta.
- 4) The abysmal turnout to the consultation effort further puts the whole process into question.



Mr. Cook, ICBA and its electrical contractor members always want to find ways that make the industry better for all concerned. We look forward to hearing from the BCSA so we can jointly work towards that end.

Yours truly,

Philip Hochstein
President

cc. The Honourable Premier Gordon Campbell
The Honourable Rich Coleman, Ministry of Housing and Social
Development
Robert Lashin, Electrical Contractors Association of BC
Harry Diemer, President and CEO, BCSA
Manley McLachlan, President, BC Construction Association.
BC Electrical Contractors

