



July 27, 2010

Harry Diemer, President  
BC Safety Authority  
505 - 6th Street, Suite 200  
New Westminster, BC  
V3L 0E1

Dear Harry:

The BC Safety Authority's proposal to impose mandatory FSR code training on the BC electrical industry has been controversial. The consultation process set up by the BCSA did not generate much interest even though 2/3 of the contractors were aware of the training proposal. To more accurately determine the industry's views ICBA polled electrical contractors throughout the province in June and July. Attached are the results of the survey.

Most thought the industry wide training proposal would have the **least** impact on improving electrical safety in the province. Other more targeted approaches within the purview of BCSA were thought to have far greater impact on improving safety. They were:

- increased inspections for those contractors found to have serious code,
- compulsory FSR Code training for those with serious infractions,
- fines for contractors and FSRs whose jobs are found to be seriously deficient.

ICBA hopes with this added information, the BC Safety Authority would not proceed with adding \$8.5 million in regulatory costs of questionable value to an industry that is performing well. Instead it will use other more effective means at its disposal to handle those few contractors and field safety representatives who pose higher safety risks.

ICBA looks forward to hearing from you in the near future.

Yours truly,

Philip Hochstein  
President

cc. BCSA Board of Directors  
Interested contractors

Independent Contractors and Businesses Association of British Columbia

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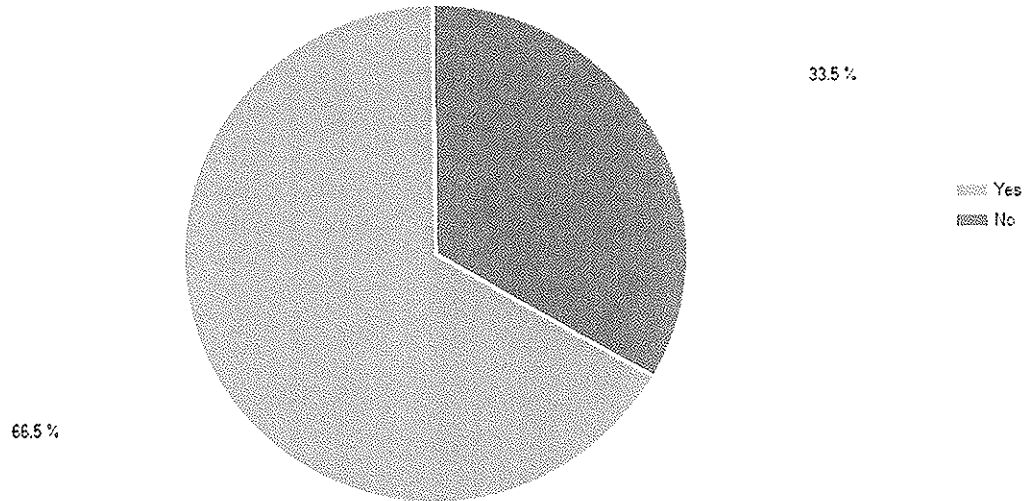
Member of **MERIT**  
CANADA



BCSA Proposed Regulation of  
Field Service Representatives  
Questionnaire Results

July 2010

**Were you aware of the BC SA proposal to require compulsory training of FSRs?**

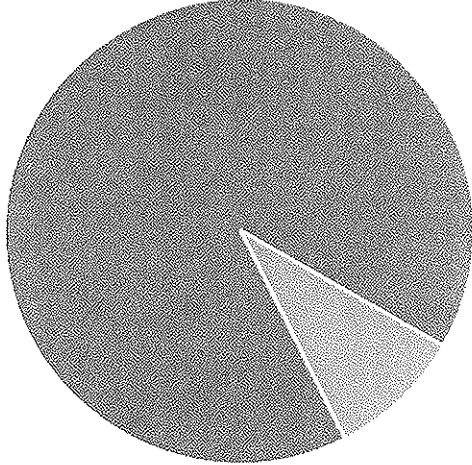


Rate on a scale of 1 to 5 (1 most positive impact on electrical safety and 5 least positive impact on electrical safety) the following possible BCSA initiatives:

	1 - Most positive Impact	2	3	4	5 - Least positive Impact
8 Hours of compulsory code training for all FSRs	11.8%	12.8%	17.2%	21.2%	36.9%
Increased inspections of those contractors found to have serious code violations on their project	69.0%	17.2%	6.9%	3.4%	3.4%
Fines for FSRs who signed off on projects with serious code violations	41.7%	24.5%	18.1%	5.9%	9.8%
Compulsory code training only for those FSR's whose jobs were found to have serious code violations	52.5%	23.3%	11.4%	5.0%	7.9%
Fines for contractors whose projects were found with serious code violations	42.3%	22.4%	18.9%	7.0%	9.5%

Do you think that the number of "serious code violations" (20 out of 40,000 inspections) warrants new regulations being imposed on the entire electrical industry?

90.7 %

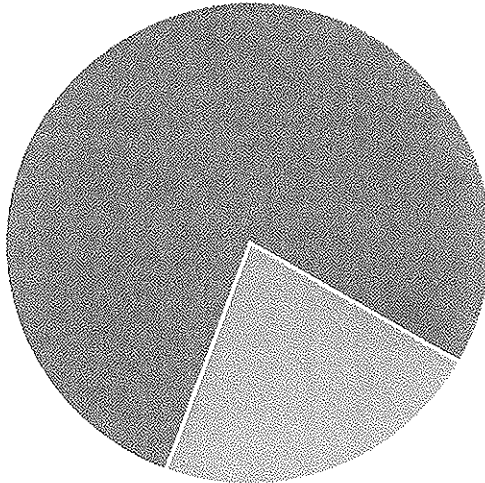


Yes  
No

9.3 %

Are the changes in the Electrical Code every 3 years significant enough to warrant the requirement of a compulsory code course?

77.6 %

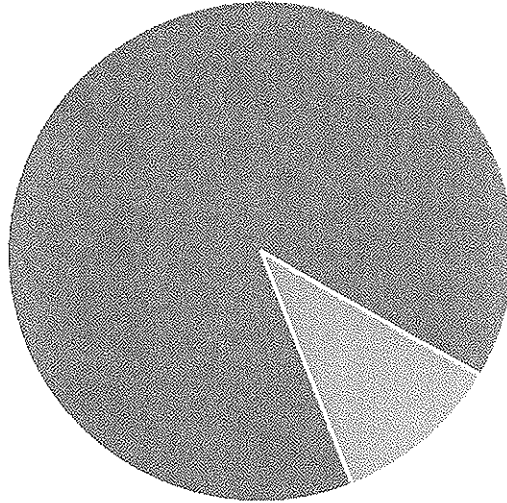


Yes  
No

22.4 %

**Do you support a requirement that FSRs must pass a test on the electrical code every 3 years in order to retain FSR status?**

89.3 %



Yes  
No

10.7 %

## Questionnaire Participant Information

**Response Rate:** 46%

**Average size of company:** 18 employees

**Average age of company:** 21 years in business

**Average number of FSRs employed:** 4

### **Location of firm:**

Lower Mainland:	52%
Vancouver Island:	13%
Interior:	20%
Northern BC:	13%
Other:	2%