

July 30, 2020

Lori Guiton
Director, Policy, Regulation & Research Division
WorkSafeBC

Email: policy@worksafebc.com

Dear Ms. Guiton,

Re: Proposed changes to OHSR Part 8: Personal Protective Clothing and Equipment (Hard Hats)

The Vancouver Regional Construction Association (VRCA) is the largest regional construction association in British Columbia with a rich history spanning over 90 years. It serves more than 700 general and trade contractors, manufacturers, suppliers and professional service providers such as architects, engineers, lawyers, accountants and insurance providers who operate as both union and open-shop employers in the industrial, commercial, institutional and high-rise residential construction industry.

VRCA is a member of the Council of Construction Associations and we are writing to comment upon the proposed changes to the hard hat regulation -- Occupational Health & Safety Regulation (OHSR) Part 8 -- that we understand are being promoted by Minister of Labour, Harry Bains, in response to concerns raised by the Sikh community.

While we respect religious freedom for all Canadians, we simply cannot accept the proposed changes to the hard hat regulation on the basis they are neither safe nor practical for the construction industry and will invariably put workers at risk of injury or fatality.

Our members work on a variety of construction projects across British Columbia and Canada. Conditions on a construction site change constantly as a project progresses. One constant, however, is our members' commitment to ensuring all workers are protected from falling, flying or thrown objects, or other harmful contacts, and return home safely each day.

The proposed changes to OHSR Part 8, that appear to be designed to accommodate religious beliefs over workplace safety, are ill-informed, impractical and irresponsible and stand to undermine the decades of good work undertaken by your organization and others to ensure that the construction industry is a safe industry.

We therefore urge WorkSafeBC to take a sober second look at the proposed changes to the regulation, to understand their ramifications not only for the business of construction but also for the families of those who may be impacted by an injury or fatality as a result of not wearing a hard hat, and to uphold the current regulation.

The well-established mandatory requirement to wear a hard hat on any part of a construction site is simply the most effective and practical way in which to help ensure our industry continues to be safe and the 230,000+ men and women who work in construction do so safely and return home to their families at the end of each day.

Thank you for the opportunity to comment.

Regards,

A handwritten signature in black ink, appearing to read 'Fiona Famulak', written in a cursive style.

Fiona Famulak
President

cc. Dave Baspaly, Council of Construction Associations