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Karen Lindsay, Policy Analyst
Policy and Research Division, WCB
6951 Westminster Hwy.
Richmond, B.C V7C 1C6

Dear Karen,

Re: Occupational Health and Safety Duties of Owners - Multiple Owner Situations

Our organization represents the Independent and Contract Falling community; therefore, we will be relating the existing problem between Licensee - Prime Contractor - Contractor - to the Independent Operator, who in a lot of cases is the person doing the work and sustaining the injuries.

When there are so many different entities involved to laying out a block, falling it, logging it and delivering the logs to a sawmill in a safe fashion, the overall responsibility must rest on the shoulders of the Licence holder. In short, there are no real 'Multiple Owner' situations when it comes to logging in British Columbia. Somebody holds the title to the patch of wood that the work is being conducted at and, because there are so many separate outfits that could be involved to getting the job done, there has to be someone acting as 'big brother', overseeing safety on the jobsite.

In our eyes, one solution to this problem would be that each Licence Holder have trained staff in all facets of a logging operation and WCB regulations on their payroll, checking things out before something bad happens. These highly trained personnel should be going over maps to make certain that the blocks are even humanly possible to log, checking roads as they are built to make sure they will be driveable with a load of logs and out in the field as often as possible, making sure that their operations are running in a smooth, safe fashion.

Its fine to contract out the labour end of things but when it comes to the safety of the workforce this should not be farmed out; always counting on the next guy to look after things. Quite frankly, in a lot of cases, this is not working out. WCB has got to make it clear that with the privilege of having a Tree Farm Licence in B.C there also must come the responsibility of looking after the workforce.

With the spawning of the newly formed B.C. Timber Sales, they also have to be made fully aware that they too have to become accountable to what is going on once they have hired a contractor to build a road or log one of their blocks that have been let out to bid. Without a doubt, some of the biggest collections of WCB infractions that one could ever witness are taking place on these jobsites. The Province seems to be policing over environmental issues, why should they not be made to police safety issues. They have become the biggest Licence holder in their own province but, in a lot of cases, they have let these jobs out to someone who, yes, did come in with the lowest bid, but can't even afford a box of bandages, never mind do the job properly or safely; it's not fair to the outfits that are trying to operate within the boundaries of compliance.

On a closing note there would be some people that would read the contents of this memo and argue that the WCB Inspectors should be doing a lot of these things we have mentioned. Quite honestly for one reason or another, we don't see these guys out in the field any more, they appear to be none existent in many parts of the province. The WFA would like to thank you for the opportunity to participate with this discussion paper and do hope it will help to clarify who should be doing what

when it comes to the safety of the workforce.

Respectfully yours,

Michael McKibbin, Chairman
Western Fallers Association