

COALITION OF BC BUSINESSES

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May 31, 2011

Policy and Research Division
WorkSafeBC
P.O. Box 5350 Station Terminal
Vancouver, BC V6B 5L5
E: regquery@worksafebc.com

RE: Support for proposed third option of OHSR Section
4.22.1(2)(b)

Dear Madam/Sir:

The purpose of this letter is to register the support of the Coalition of BC Businesses behind the proposed third option for compliance with Section 4.22.1(2)(b) of the OHSR.

As the representative of over 50,000 small and medium-sized businesses across British Columbia, it is our primary responsibility to ensure the best interests of the industries we represent.

The Coalition's principal focus is the development of labour and employment policies that will help foster a positive relationship between employers and employees and a climate for new economic growth, opportunities and jobs.

We strongly support the inclusion of the proposed third option for compliance with Section 4.22.1(2)(b) because it is consistent with proven best practices and is supported by existing research, as recommended in Deloitte's *Barrier Implementation Pilot Project Report* and further outlined in the discussion paper.

A key consideration for selecting options that will improve health and safety is to ensure that the proposed measures do not potentially create scenarios that are bad or worse than those they were intended to resolve. Research and analysis have shown that the existing two options for

Member Associations

Alliance of Beverage
Licensees BC

BC Hotel Association

BC Chamber of
Commerce

BC Real Estate
Association

BC Restaurant and
Foodservices Association

Building Owners &
Managers Association

Building Supply Dealers
Association

Canadian Council of
Grocery Distributors

Canadian Home Builders'
Association – BC

Canadian Restaurant and
Foodservices Association

Canadian Federation of
Independent Grocers

Independent Contractors
& Businesses Association

Insurance Brokers
Association of BC

New Car Dealers
Association of BC

Retail Council of Canada

Shelfspace

Western Convenience
Stores Association

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compliance fail to adequately address this principle. The discussion paper cites research showing that barriers potentially increase the risk of robberies and violence, have a negative impact on sales, and actually invite rather than deter theft. In addition, the discussion paper highlights the potential that having additional workers may even multiply the risk of injury.

In fact, overall, the paper fails to mention any evidence that either of the two existing options improves safety, and it is our position that implementing the third proposal is a critical step forward for the retail industry.

The Coalition believes that the proposed third option provides employees with safe, proven results, and is financially viable for all employers. Option 3 presents a logical, reasoned approach for improving worker safety in late night retail stores and very effectively addresses any potential problem scenarios and includes a detailed process for ensuring their resolution.

In conclusion, it is our view that implementing options 1 and 2 would negatively impact the vastly increased safety standards that the business community has worked so hard to achieve throughout the late night retail sector, and could potentially force many retailers out of business.

The members of the Coalition of BC Businesses support option three and believe that its inclusion would reinforce best industry practices and encourage their broader application amongst B.C. retailers.

Thank you for providing this opportunity to comment on the proposed regulatory amendment.

Yours truly,

A handwritten signature in black ink, appearing to read "Mark von Schellwitz". The signature is fluid and cursive, with a prominent loop at the end.

Mark von Schellwitz
Chair,
Coalition of B.C. Businesses

CC: Hon/ Stephanie Cadieux