

July 24, 2020

Lori Guiton
Director, Policy, Regulation & Research Division
WorkSafeBC
Email: policy@worksafebc.com

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

Dear Ms. Guiton:

We are writing to comment upon the proposed changes to the hard hat regulation 8.11(1) Occupational Health & Safety Regulation (OHSR) Part 8.

BCCA represents employers of all labour affiliations in the commercial, industrial, and institutional construction industry, and we are a leading stakeholder organization regarding the safety of workers in our industry.

We are strongly opposed to the proposed change regarding the regulation on hard hats.

The current Regulation 8.11(1) currently requires that hard hats be worn by a worker where there is a danger of head injury from falling, flying or thrown objects, or other harmful contacts. Risk of head injury is a characteristic of being on a construction site. It is the nature of our work, and why we take safety very seriously. We are greatly concerned that the Ministry of Labour request that WorkSafeBC consider amending the OHSR to continue to protect the health and safety of turban-wearing Sikhs will put the Sikh community in unnecessary danger on worksites.

It is irrefutable that without a hardhat a worker is more vulnerable to injury, and that introducing subjectivity about when and where Personal Protective Equipment should be worn will introduce greater risk. We have only to look to COVID-19 to remind ourselves of the value of consistent messaging and clear rules.

The best way to protect workers from head injuries is to keep hard hats mandatory. No other consideration should trump safety.

Thank you for the opportunity to comment.

Sincerely,



Chris Atchison, President
BC Construction Association
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