



July 9, 2013

The Honorable Christy Clark, Premier
Province of BC
Box 9041
Station PROV GOVT
Victoria, BC

Dear Premier Clark:

On behalf of the Electrical Inspectors Association of British Columbia (EIABC), which represents a broad cross section of the electrical industry in B.C., I would like to express our concerns regarding the recent action by the British Columbia Safety Authority (BCSA) to recognize restricted Electrical Work Practitioner certificates issued by the Applied Science Technologists & Technicians of British Columbia (ASTTBC).

This action by the BCSA violates Clause 15(k) of the BC Safety Standards Act (BC SSA) which permits the BCSA Provincial Safety manager to recognize programs of training only for the purpose of qualifying for a license, certificate, permit, or other permission under this Act. Allowing semi-skilled workers the right to perform regulated electrical work in BC on electrical systems for which they are not adequately trained, will not enhance as claimed, but will endanger public health and safety in BC. This action not only creates a legal conflict with Clause 15 of the BC SSA, but undermines the Canadian electrical apprenticeship system and the national "Red Seal" endorsement program, which have been designed to provide both the technical and the experiential learning required to become a safe, skilled electrical worker. This "Red Seal" training is recognized both nationally and internationally for producing qualified electrical workers with the technical knowledge and the on site practical training necessary to safely install and maintain regulated electrical equipment for the protection of workers and the general public from fire and shock hazards.

Under a BCSA Draft Bulletin, only 480 hours of field experience under a qualified person would be deemed to be sufficient to allow an ASTT member to perform regulated electrical work without supervision. This would enable someone who has taken a 1 year Technician program or 2 year Technologist program to apply for a restricted Electrical Work Practitioner certification. A journey-person electrician is required to serve an electrical apprenticeship with 6000 hours of field experience and 1200 hours of technical training before receiving a Certificate of Qualification. The safety of workers and the general public in the Province of B.C. will be endangered by this BCSA action. The BC SSA does not permit the ASTTBC to do training and they do not have a training program of their own for this work. In addition, they will be policing their own members for any work that doesn't meet standards. This is because it will be impossible even for an Electrical Safety Officer (inspector) to determine the qualifications of the certificate holder (journey-person electrician or ASTTBC self qualified restricted Electrical Work Practitioner) who is responsible for the specific work performed under the electrical permit.

This BCSA action also fails to properly recognize the authority of the Industry Training Authority (ITA) that has been mandated by the Province of B.C. as the governing body for trades training and trades qualifications in the Province of B.C. The BCSA Provincial Safety Manager bypassed the ITA in taking this action.

The BCSA also did not institute a proper consultative process to seek input from all major stakeholders prior to implementation of this action. The entire electrical industry has voiced opposition to this BCSA proposal for over two years. The BCSA has continuously ignored industry's concerns. In order to make the BCSA aware of industry concerns, a motion was put forward at the BCSA Electrical Technology Advisory Committee (ETAC) meeting on May 10, 2013. It received unanimous support from that committee which is made up of all sectors of the electrical industry.

The motion is as follows:

"In consideration of the fact that the majority of key industry stakeholders such as the ECA of BC, IBEW, EIA, EAC, the ETAC and others were not consulted prior to the acceptance of this proposal, and continue to publicly voice their strong opposition to the BCSA's delegation of their authority to a third party, and in light of the fact there is currently a petition with over 1600 signatures against this proposal, therefore be it resolved that the Electrical Technology Advisory Committee are on record that they are opposed to the BCSA granting other organizations the authority to issue certifications to perform electrical work."

The BCSA proposes to recognize training programs administered by the ASTTBC and also proposes to recognize certificates issued by the ASTTBC, and that action could be legally challenged as a violation of the BC SSA.

Clause 15 of the BC SSA states the following :

15 A provincial safety manager may exercise any or all of the powers of a safety officer and may do one or more of the following:

- (a) issue, suspend or revoke a certificate of qualification;
- (b) issue, suspend or revoke a licence;
- (k) recognize programs of training for the purpose of qualifying for a licence, certificate, permit or other permission under this Act;

Clause 15k above refers to "programs of training" that may be acceptable to the Provincial Safety Manager. The ASTTBC is not a training organization. The scope of the BC ASTTBC Act and Regulations has no provisions for training programs.

As background to this subject, it should be noted that a similar proposal was brought forward by the ASTTBC to the Electrical Safety Advisory Committee, (ESAC), in March 2000. The purpose of this committee was to advise government of electrical safety concerns. The ESAC did not accept the proposal as they recognized that a person who has taken a 1 year Technician program or 2 year Technologist program would not have equivalent qualifications and safety training as a person who serves a 4 year electrical apprenticeship consisting of 6000 hours of work experience and four ten week (300 hour) technical training sessions and then is assessed by an independent national "Red Seal" Inter-Provincial exam before receiving a Certificate of Qualification in electrical work.

The ASTTBC has stated that there is a lack of adequately trained persons to perform some types of technical electrical work and that the certificates offered through this proposal will provide for this shortfall as well as make legitimate, some of the work they are doing now. Many ITA credentialed electricians have increased their qualifications and expertise in specific areas, enabling them to perform the tasks noted by the ASTTBC as lacking qualified individuals. Some of these electricians became Technologists or Technicians as well. An ITA credential issued to an individual at the time of completion of an apprenticeship program provides that individual with the basic level of competence required to perform regulated electrical work unsupervised. This "electrician" continues to increase his or her experience over time and often enhances his or her training and experience to include specialized training where necessary for the installation, maintenance, repair, adjustment and calibration of today's sophisticated electrical systems and equipment. "Manufacturers Technical Representatives" are often used to provide the specific expertise required to install, service, commission, and maintain their own specialized electrical

equipment and they often work hand in hand with electrical contractor's electricians. In this way, safety is not compromised in the process. The Electrical Safety Regulation 4(1)(e) to the Safety Standards Act authorizes these "Manufactures Technical Representatives" to perform regulated electrical work for this purpose.

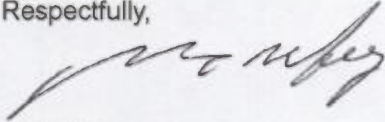
If this BCSA action becomes a reality, it will not only create a legal conflict with Clause 15 of the BC SSA, but it will open the door for similar proposals which will eventually lead to the Province of B.C. not achieving the standards required to participate in the national "Red Seal" program.

Members of the EIABC are strongly opposed to this proposal. This letter is a result of unanimous acceptance of a motion from the floor at the recent EIABC general meeting held on May 30, 2013. Seventy members were in attendance. Their opposition is also strongly supported by the Electrical Contractors Association of British Columbia (ECABC), the International Brotherhood of Electrical Workers (IBEW) and the Electrical Articulation Committee (EAC). A large number of small business owners, maintenance and industrial workers, the GVRD, BC Hydro, and the entire electrical industry have voiced their opposition to this proposal by signing the "Protect the Red Seal Trades" petition (<http://www.protectredsealtrades.ca>) and the number of signatures is growing each day. As of this date, there are now over 2000 signatures.

We ask you to consider how this BCSA action is in violation of the BC SSA and puts workers and the public of B.C. at risk if a semi-skilled workforce is allowed to do regulated electrical work. We urge you to take appropriate steps to prevent this BCSA action from proceeding.

Please feel free to contact me if you would like further information.

Respectfully,



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cc:
The Honorable Richard Coleman Deputy Premier and Minister of Natural Gas Development and Minister Responsible for Housing
Peter Cook, Chair, Board of Directors, BCSA
Catherine Roome, President and CEO, BCSA
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Kevin Evans, CEO, Industry Training Authority
Deborah Cahill, President, ECA of BC
Phil Venoit, President, IBEW Provincial Council
Peter Poeschek, Chair of Electrical Articulation Committee