

October 30, 2007.

Independent Review Panel  
New Brunswick Workplace Health, Safety and Compensation Commission  
535 Beaverbrook Court  
Fredericton, N.B.  
E3B 1X6

Attention: Mr. Louis R. Comeau, Chair

Dear Mr. Comeau:

The NB Power Group of Companies welcomes the opportunity to participate in the WHSCC Independent Review process. We have enjoyed a productive and yet cordial professional relationship with the Commission for many years and fully appreciate the essential roles it plays. In order to properly position our comments, a brief history of the NB Power approaches to safety would be helpful.

From the mid 1970's to 1993 we were most certainly conscientious from a safety perspective, but using traditional approaches to accident prevention and mitigation we still experienced between 110 and 120 disabling accidents annually which resulted in some 1500 lost days. In 1994, responsibility for health and safety was reorganized under the Human Resources portfolio and formed one of eight integrated programs comprising the HR Strategy. This strategy has come to be recognized by the following graphic:



With an overall Vision of *People at Their Best*, we embody these four Principles:

1. Employee Growth and Evolution
2. Customer Focus
3. Team Work
4. Corporate Excellence

In the end, the desired outcome is “The right person, in the right frame of mind, in the right job, at the right time”!

In the traditional sense, each of the Strategy’s components operates with specific processes. In the case of Safety, most certainly we rely on legislation and scientific principles in the development of rules, standards and procedures; we have a mature network of Joint Health and Safety Committees; we conduct regular safety audits; and employ an accredited group of safety professionals dedicated to the elimination of accidents from the workplace.

But this is perhaps where similarities to industry “best practices” cease. When we say this is an integrated strategy, we are very sincere in our belief that for any of the 8 programs to be successful, *all* must be functioning at the highest possible level. Intuitively, this may be fundamentally obvious...How can an organization have an effective Safety Culture if the Labour Relations climate is poor?...Where would Safety be without effective Leadership?...How can employees focus on safety if the multitude of factors that impact their overall well-being are not supported in the workplace?...And the same argument extends equally to each of the remaining programs.

A pivotal assertion of this strategy is that if one of the programs is not performing, you can attack the deficiencies, not only by direct amelioration, but through examining the myriad of root causes that can be lurking in the other 7 programs as well. The key is that these programs represent the very fundamentals of keeping people in the right frame of mind. Doing so, in the safety sense, eliminates the possibility of the performance of substandard acts as well as the existence of substandard conditions in the workplace. Without these, incidents simply cease to happen.

So, how has it worked for us? We suggest very well! We are currently assessed in the WHSCC’s Rate Category 1, and have lowered our annual disabling incidents to single digits, with the real prospect of attaining zero in the very near future.

It may be asked at this juncture what relevance does this have to comments for the Independent Review Panel. Succinctly put, we believe there is great opportunity for the WHSCC to adopt a similarly expanded perspective. If we leave the strict insurance piece aside for the moment, and focus on accident prevention models, the WHSCC has, along with most other jurisdictions, relied on elimination strategies based on, in large part, education of the worker and employer. While we concur that these comprise important pieces of achieving workplace safety, we feel that this education must extend beyond due diligence, the three Rights, and specific hazard assessment and mitigation.

We would further suggest that a great opportunity exists within the educational system by introducing Health and Safety at the earliest grade levels and continuing that education throughout an individual's entire school experience. This should not be an "add-on", but established as an integral part of the curriculum. After all, the intent in large measure is to prepare each of us for a 30 – 40 year working career, and without a fundamental understanding of what it takes to enjoy our time in the workforce in a state of well-being, we all begin at a deficit. It goes without saying that we believe this education must include those topics that our strategy has shown to be so effective in creating a safe working environment.

It is difficult to fully capture the benefits we have experienced by embracing this integrated approach in a commentary such as this, but would welcome the opportunity to discuss the potential roles the WHSCC could play at the provincial level in influencing employers and employees alike toward a total loss control philosophy.

Given the lateness of this brief, the Moncton session may be appropriate, but we would be available for either Fredericton or Saint John as well. Please advise at your convenience.

Again, thank you for the opportunity to be a part of this worthwhile process.

Sincerely,

Gary S. (Duff) Boyd  
Director, Health Safety & Security Services  
NB Power Holding Corporation.