



16 May 2018

Hon. Roger Melanson, Minister
Post-Secondary Education, Training and Labour
Government of New Brunswick
PO Box 6000
Fredericton, NB
E3B 5H1

Dear Minister Melanson:

Re: *Occupational Health and Safety Act Amendments - Workplace Violence Risk Assessment Policy*

Thank you for the opportunity to provide input on behalf of the nearly 1000 members of the Fredericton Chamber of Commerce on this important issue. Employers of all sizes recognize that our employees are the most important asset to any organization. Their well-being has significantly tangible effects on the success or failure of a business. Beyond that, many employers view employees as family members - often spending more time with their co-workers than at home. The majority of chamber members are small businesses - often with a tight-knit staff, including the owner or manager - safety of team members is of the utmost concern.

Overall, it is our position that assessing the risk of violence in a place of employment is good practice for any business. Similarly, a written code of practice to mitigate the risk of violence should such risk be identified by an employment and a code of practice with respect to harassment at the workplace is desirable.

We note that for some employers - particularly small businesses - creating a risk assessment process or codes of practice may be a difficult or onerous tasks. Factors such as the size of the business, expertise of the owner or employees and experience creating policies may increase difficulties in complying with *Regulation 91-191*.

We recommend that the department provide employers with resources such as templates or some other guidance / assistance to help reduce the burden of compliance with the regulation. Employers are faced with an increasing number of requirements to operate - time is short - providing this type of assistance will be appreciated by businesses. It will also increase compliance as some employers may not see the value in creating codes of practice in situations where they deem the risk of violence negligible in their workplace. In this case, the regulations may be unfortunately viewed as additional [and unnecessary] red tape.



**FREDERICTON
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We also recommend that the government provide a 'grace period' after regulations come into force to allow businesses time to evaluate, understand and implement required changes to their policies and procedures.

We thank the government for its ongoing Employment Standards review and look forward to participating in any further consultations regarding proposed amendments relevant to the business community.

Sincerely,

Keir Clark
Scotia Wealth Management
President, Fredericton Chamber of Commerce

Krista Ross, CEO
Fredericton Chamber of Commerce