

Re: 2006 Proposed Amendments to the Occupational Health and Safety Regulation

On behalf of the British Columbia Dental Association (BCDA) I would like to thank WorkSafe BC for the opportunity to submit our views on this topic.

The BCDA is interested in commenting on the proposed amendments specifically as they relate to Part 6, Sections 6.36(1.1) "Engineering and work practice controls", as it pertains to the use of safety-engineered needles.

The Health Promotions Committee of the BCDA has investigated safety-engineered needles and feels strongly that rather than being a safety measure, they will be hazardous to use in the mouth. Intraoral injections are site-specific and require an extremely high degree of accuracy of placement if they are to be effective and without undue side-effects. This necessary accuracy would be compromised by the use of safety-engineered needles. In addition, the nature of the dentist's work often necessitates multiple injections during the course of a procedure which is achieved by recapping the needle after use, reloading fresh anaesthetic cartridges, and re-using the same syringe perhaps several times throughout a single dental procedure. Dental personnel at all levels receive training in safe methods of recapping needles and reloading syringes and there are commercially available products that are designed to make this process virtually fail-safe. The use of such techniques, devices and guidelines on the protocols that a dental office should follow in the event of a needle stick injury have been, and will continue to be, disseminated to dental personnel via provincial and national Associations.

We note the wording: "Note that in addition to Section 6.36(1), Section 6.36(1.1) (see also G6.36 (1.1)) requires the use of safety-engineered needles in health care workplaces when hollow-bore needles are used for vascular access, *unless it is not safe or practicable to do so*". (Italics added).

While we accept that this seems to imply that this applies to the use of needles when used exclusively for vascular access, we would like to suggest adding more appropriate wording that would specifically exclude the mandatory requirement for the use of safety-engineered needles for intra-oral use in dentistry. As far as we are able to determine, dentists never use needles intra-orally for vascular access. The

overwhelming majority of intra oral injections will be for the purpose of producing local anaesthesia, with a small minority on rare occasions being done for other reasons (intramuscular or subcutaneous injection of medications other than local anaesthetic, for example). Whatever the reason for giving intra-oral injections, it is not appropriate to use safety-engineered needles in the mouth.

To support our view, we refer you to Section 45.1(2) of the province of Manitoba's *Workplace Safety and Health Amendment Act (Needles in Medical Workplaces)*, which was enacted on January 1, 2006, states "...If it is not reasonably practicable to use safety engineered needles in a medical workplace,...". The implication here, is that the Legislative Assembly of Manitoba has recognized that there are circumstances where the use of safety-engineered needles would be inappropriate. However, the BCDA feels this wording is not explicit enough and would like specific reference in British Columbia's legislation to the fact that dentistry be exempt from the mandatory use of safety-engineered needles for intraoral injections.

There may be other branches of the health care industry in BC who feel that safety engineered needles should be used in all situations at all times. The BCDA would trust that Worksafe BC would not give credence to input from sources who may not have any knowledge of dentistry. Our position is that the use of safety engineered needles in the intra oral environment would be hazardous for both operator and patient and we strongly urge you to consider inserting specific wording to the amendments that exempt their use in the mouth. The BCDA would be happy to assist in developing the phraseology, so please do not hesitate to contact me if we can be of any help.

Once again, thank you for the opportunity to participate in this forum. Please do not hesitate to contact me if you require any further information.

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