
Submission ID: P08.W26.GP2.7VB

Part 6: Substance Specific Requirements, relating to safety-engineered devices for all hollow bore needles

1. Name: Lisa A. Keech

(a) Feedback is provided: on own behalf

Organization:

(b) Feedback is provided: from a worker's perspective

2. E-mail:

3. Feedback:

i am an RN employed by VIHA and am commenting regarding regulation of medical sharps about to be put forth for public hearing. while i am in full support of the essential push to regulate the exclusive use of safety engineered medical devices in healthcare i have concerns that i feel could create a safer environment with regards to this issue.

first, the timeframe to implementation is far too lengthy and continues to cost the system injury time (and stress/sick time)---those are staggering costs in the long term picture. according to available stats, 6000 workers will be injured by sharps during the wait to implementation and that can cost upwards of millions of dollars if those workers contract Hepatitis for example.

secondly, it is imperative to include medical sharps in this regulation because the injuries from those devices are just as dangerous to workers and they continue to injure workers.

third, the mandated joint safety committees, to my understanding, were not

give the opportunity to work or consult with the creation of these regulations and make recommendations as worker and employer representatives.

Fourth, a system of logging shapr related injuries is imerative for proper evaluative tools as well as tracking incidents in healthcare.

Finally, it appears that safety engineered devices were implimented with little, if any, input from the workers who use those deveices as part of their jobs which i feel lacks substance.

4. Please indicate your level of support of the proposed amendments:
generally agree