



Canadian Blood Services
Société canadienne du sang

6.48

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Stephen Chase
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2006-11-29

Ms. Anne Burch
Policy and Research Divison
WorkSafeBC – Workers' Compensation
Board of B.C.
PO Box 5350, Station Terminal
Vancouver, BC V6B 5L5

"BY COURIER"

**Re: Proposed amendment to Part 6: Substance Specific Requirements in the
Occupational Health and Safety Regulation**

Dear Ms. Burch:

I am writing to you on behalf of Canadian Blood Services with respect to the proposed amendment to Part 6: Substance Specific Requirements in the Occupational Health and Safety Regulation (the "Regulation"). We are pleased to have an opportunity to submit comments to WorkSafeBC on this important issue.

As you are aware, Canadian Blood Services was established in accordance with the recommendations of the "Commission of Inquiry on the Blood System in Canada" conducted by the late Justice Horace Krever to operate the blood system across Canada (except Quebec). Canadian Blood Services operates the blood system within provincial and territorial jurisdictions with respect to matters such as employment and labour law, however, since it is a manufacturer of biological products, Canadian Blood Services is also regulated by Health Canada.

As a national organization responsible for collection, testing and manufacture of blood and blood products across Canada, except Quebec, Canadian Blood Services manages a national inventory. When introducing changes to the medical equipment used, Canadian Blood Services strives to implement a national plan which is most cost-effective to Canadians, unless outweighed by concerns for the safety of Canadians, by depleting its inventory and then moving in a strategic fashion to adopt new technology.

We note that the proposed amendments to the Regulation require the use of safety-engineered medical sharps for the care and treatment of individuals. We are pleased to have addressed the

safety engineered sharps devices (hollow-bore needles) aspect of the regulations with you earlier this year.

The proposed new amendments, however, define "medical sharp" to include broken glass. By this, we understand that "medical sharp" will include all glass devices used for the care and treatment of individuals which have the potential to break, including the glass test tubes Canadian Blood Services uses to collect blood from donors for testing.

The proposed amendment will require that "on and after October 1, 2008, any medical sharp used to care for or treat a person must be a safety-engineered medical sharp". Although collection of blood donations may not be considered *care for or treatment of* a person, we would appreciate clarification whether this provision is intended to apply to Canadian Blood Services.

For Canadian Blood Services and the national blood system, it is important that transition to any safety-engineered medical sharp is coordinated across the country to ensure that it is not unnecessarily difficult or impossible to operate the integrated national blood system that has been mandated to Canadian Blood Services by provincial and territorial governments and regulated by Health Canada.

Before Canadian Blood Services could switch to plastic test tubes or other safety-engineered equipment, we would need to have the assay manufacturers produce plastic test tubes or other safety-engineered equipment which are qualified for the particular use for that assay, for example, West Nile Virus and PK7200. We would then have to engage in extensive feasibility testing to determine if it is appropriate for use and ensure that none of our processes are impacted by the use of plastic tubes. For example, the alternative would have to properly interact with laboratory equipment. Given the regulatory nature of our test environment, specifically the requirements for assay validation, development/revision of standard operating procedures approved by Health Canada, and the need for contract negotiation with our suppliers and national inventory management, Canadian Blood Services may not be prepared for implementation of safety-engineered test tubes or any other medical sharp as of October 1st, 2008.

Canadian Blood Services is committed to providing our workers with a safe workplace, and is willing to work towards conversion to safety-engineered alternatives. We already have a national plan to implement safety-engineered needle sharps by the end of January 2007.

However, to facilitate the conversion of other medical sharps to safety-engineered alternatives, we request that that the proposed Section 6.36(1.3) be amended so that Section 6.36(1.1) and (1.2) shall not apply if:

"(c) a national program, including a blood collection program that requires approval of Health Canada to use safety-engineered medical sharps has not yet received approval by Health Canada, until such time as the national program has had a reasonable time to implement the use of safety-engineered needles following approval by Health Canada."

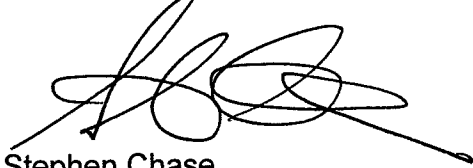
November 29, 2006

We request the opportunity to discuss with the Board our specific concerns as this issue is considered in British Columbia, including proposed timelines for compliance within the province. Ms. Emily Joyce of our legal department would be available for such a discussion and she can be reached at (613) 793-2232 or emily.joyce@bloodservices.ca.

Should you require any information, please contact either Ms. Joyce or Ms. Jennifer Philippe, Director, Technical Support (Collections) at (613) 739-2035 or jennifer.philippe@bloodservices.ca.

Thank you for your consideration.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'S. Chase', with a long horizontal stroke extending to the right.

Stephen Chase
Executive Director
Government Relations

cc.: Jennifer Philippe
Edna Zuber
David Howe