



Health
Sciences
Association of
British Columbia

The Union of Caring Professionals

November 28, 2006

WorkSafeBC
Prevention Policy and Regulation Review Department
Policy and Research Division
PO Box 5350 Station Terminal
Vancouver, BC V6B 5L5



Dear Sirs/Mesdames:

Re: Proposed changes to Part 6 – OHS Regulation

I am writing on behalf of the Health Sciences Association of BC, a labour union representing some 13,000 health care professionals. We have comments to make on two of the topics under review.

1. "Medical Sharps"

We have actively supported initiatives in this regard with other Healthcare unions and the SEIU, which were undertaken in the previous review of this matter. Accordingly, we are in agreement with comments made by the British Columbia Nurses Union.

We support the broadening of language to include all medical sharps. This will provide our members in various technologies with heightened safety regarding the devices they use in day to day work.

- Local joint safety committees must be involved in the selection process for devices. These committees reflect the breadth of the workplaces and members can provide invaluable feedback.
- The logging of injuries from medical sharps must be implemented. Otherwise, there is no way to evaluate the effectiveness of these changes. We would have expected this process to be implemented before now.
- There is no reason that implementation of these proposed changes needs to take over a year. The topic is uppermost in employer's minds, safer products are available, and processes are in place to upgrade devices in various workplaces. The proposed changes could easily be incorporated in a much shorter time frame.

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2. Infectious Agents and Materials

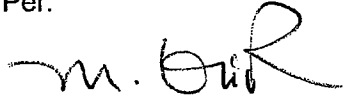
We are generally in favour of these proposals. They reflect the growing knowledge base in the epidemiological literature.

We would like to see the "safety engineered needle" definition be in line with the latest proposals, that is, the broader "medical sharp".

Yours truly,

HEALTH SCIENCES ASSOCIATION OF BC

Per:



Martin K. Lovick, RSW
Senior Labour Relations Officer

MKL/jt

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January 30, 2007

WorkSafeBC
Prevention Policy and Regulation Review Department
P.O. Box 4700 Stn. Terminal
Vancouver, BC V6B 1J1

Dear Sir or Madam:

RE: Part 4: General Conditions: Working Alone or In Isolation

This letter is written in support of previous submissions on this topic by the United Food and Commercial Workers Union and others.

As others have noted, the hours of applicability are limiting. Seasonal and weather factors, given BC's size, must be considered as well as geographical isolation.

It is simplistic that this initiative be described as "pay before pumping", or that a simple "fix" is the increasing of staff. The threat of violence as contemplated in 4.28 currently, is the issue. We contend that 4.28 demands much more in the way of risk assessment, and education as well as check in procedures for isolated workers.

We ask that this topic receive full analysis and that the amendments be broad enough to ensure the lowest possible risk to affected workers, as the Act intended.

Yours truly,

HEALTH SCIENCES ASSOCIATION OF BC

Per:

Martin K. Lovick, RSW
Senior Labour Relations Officer

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CC:

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