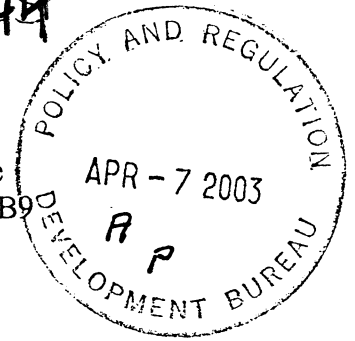


W1044

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Workers Compensation Board of British Columbia
Policy & Regulation Development Bureau
P.O. Box 5350 Station Terminal
Vancouver, BC
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To the Workers Compensation Board of British Columbia:

I am writing this letter as a concerned Registered Nurse working in an acute care hospital. I would like to try addressing my many concerns that I have in regards to the Workers Compensation board proposed changes to the regulations and processes within. My first concerns involve only holding two public hearings across the entire province. My second concern involves the occupational exposure limits which will have a devastating impact on workers health and the issue of gutting the current level of first aid service. I will complete this submission addressing how the WCB will be decreasing the strength in the language concerning the education component relating to all the regulations. There is no health and safety justification for any of the proposed amendments. They merely fulfill a directive from the provincial government to deregulate.

In previous years when the regulations were being reviewed and revised, the board travelled throughout the province giving ample opportunity for the public to voice their concerns in a public forum of the changes. I feel that this was a just and fair process. Now having only two venues to make public presentation in no where fair and just by any means. Rural BC has suffered the brunt of the cuts by the BC Liberal Government. The WCB is compounding the problem by not consulting with us in our community before any changes are made. Many of the proposed amendments that WCB are taking forward to public hearing will have a devastating effect on workers health and safety. We should have the opportunity to voice our opinions. Travel in itself to one of the forums is an issue in itself. The forum in the North is in Prince George which is an 8 hour drive one way mid week. It would virtually take us two days in travel time not looking at travel costs in a attempt to make a presentation. Due to our locations and shift work we are not physically possible to get to a location nearest us. Please reconsider holding public forums in more communities.

I would now like to address the occupational exposure limits. These regulations will expose workers to a much higher level of toxic chemicals; many of them reproduced hazards and cancer-causing toxins. As I work in an area in which we are exposed to many chemicals that have such life threatening side effects, I ask why the Compensation board would put its workers at so much risk when it could be unavoidable. Some of the toxins at my workplace include cancer treating drugs, formaldehyde, nitrous oxide, anaesthetic gas, cleaning products and many other chemicals. The exposure limits should remain as they are presently, so workers can be adequately protected. Changes have been

made in my workplace due to the current threshold limits of anaesthetic gases. We had concerns that nurses and other healthcare workers were being exposed the high levels of nitrous oxide in our operating rooms. As a result of an inspection, the levels were found to be too high and a scavenger system was put in place. As we were testing the results in the operation room, some of the healthcare personal was becoming systematic in our labour and delivery suites. We requested testing to be done in those areas. It took a long time but when the level came back they were over the threshold limits with an end result of a scavenger system being put in place. I have a major concern that the proposed level is double of the current level. I really do question what would of occurred if the proposed levels were put in place at that time. I feel are livelihood would have been put in jeopardy. We should not have to be exposed to these harmful chemicals. If the levels are higher you are putting are health at risk. This can prevent illness for our future. The Workers Compensation Board of BC considers healthcare to be a low risk industry on the same level of administrative, retail, business and professional services. I feel that you do not have a clear picture of what we daily have to endure. We are at risks of violence, muscle skeletal injury, dealing with emergencies singly or on a global level, safety when working alone or in isolation, subjected to biohazardous material and cytotoxic drugs, and dealing with the unpredictable. Injury rates alone are very apparent and visible with healthcare injury claims being greater than that of any other industry.

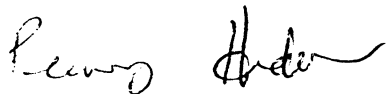
The next issue that I would like to address is the changes to the current level and quality of first aid services. Leaving it to the employer as to the current level and quality of first aid is just not sufficient. There needs to firm rules and standards so that workers get adequate levels and quality of first aid when they get injured. This would make it much more difficult for workers to exercise their right to know about the health and safety hazards, and to participate in health and safety matters in their workplace. The level of first aid that I am receiving at the present time is very adequate but has many flaws in the fact that healthcare and industry work so differently. I am very concerned for many other healthcare workers around the province if the level of first aid is left to the employers. I would expect that the level of first aid would have uniformity between healthcare facilities around the province. As each employer works differently I just do not see this occurring. We need rules to be the same for all employers. We are exposed to so many risks such as Muscular Skeletal Injury, ergonomics, biohazards and working in isolation to name just a few. As we have exposure to risks consistently around the clock, we need to know that first aid attention will be there when we need it. My concern is that the level of first aid will be dependant on performance based which means first aid will be based on injuries occurring. There needs actions to occur before these injuries occur, but if injuries occur there must be first aid available to all healthcare workers. The employers have a duty to make a safe work place for all employees.

Education for health and safety is very clear in the present regulations but if you go to performance based, will that mean we will only get education on prevention of muscular skeletal injuries and violence prevention if we have injuries in that area. We are at risk daily if not hourly to MSI and violence. This is very evidence based on stat at any healthcare facility with healthcare having the highest injury rate. This is primarily due to the nature and the unpredictability of our work. We recently were told that the northern

health authority spent near 23 million dollars on claims due to injuries. Even though there is regulations that talk about training, it is very concerning that there is lack of training. This is mostly due to fact that we are desperately short of nurses and physiotherapist that are the instructors of these training sessions. They have said that they are going to make it a priority to get this training done as we know that prevention is the key preventing injuries. Along with the training is the proper equipment. With any piece of equipment there needs to be training. If the language is changed the implementation of some of the training may show some difficulties. WCB is well aware that Healthcare injuries is increasing at a alarming rate. With education and proper equipment some of these injuries may be able to be prevented in the long run. Another area where there is lack of training is in violence prevention. Healthcare workers are daily at risk of violence. There is research that prevention and de-escalation of any potentially or violent event is the key to risk prevention. I am very glad to see that the training requirement in the Violence in the Workplace section has not been removed.

The proposed regulations pose a threat to workers lives. Please do not streamline the regulations so much that workers safety may be compromised. In workplace health, having fewer regulations and failing to achieve the performance goals may mean death, injury and disease of BC workers. Please protect the workers and stop the changes to the regulation. I feel my health and safety may be at risk. For all the reasons stated above I do not support the proposed amendments to the Occupational Health and Safety Regulations. The current regulations were crafted after a lengthy and thoughtful consultation with employers and workers and extensive public hearings. The current process is driven by a political agenda not a health and safety one. I do not want to see the health and safety of the workers of British Columbia compromised by lowering standards in the name of deregulation.

Sincerely yours

A handwritten signature in cursive script, appearing to read "Penny Henderson".

Penny Henderson

Cc: Roger Harris