

Presentation to the WCB Public Hearings 2008

Prince George

May 22, 2008

I am here today representing the members of CEP Local 603. There are 406 members in our local and we all work at Northwood Pulp.

I am pleased to have the opportunity to participate in these hearings and to represent the concerns of my members to the proposed regulation amendments. We appreciate that we have the chance to attend hearings in our community.

CEP Local 603 is concerned with the proposed amendments to Part 5 Chemical and Biological Substances relating to designated substances.

Section 5.57 (b)(c) Designated substances

This proposed amendment will continue to allow the use of the ACGIH list as the sole resource available to employers and workers in BC for the designation of chemicals as reproductive toxins and sensitizers.

We do not agree with this amendment because the ACGIH will no longer reference these designations in their list unless they are the basis for the threshold limit value. ACGIH also has said that they do not have the resources available to do ongoing research in order to keep these designations up to date. Our workers are employed in a pulp mill, an industrial operation that relies heavily on the use of chemicals in the production processes. Given that chemical hazards place workers at a high risk of exposures it is essential that they have the best protection that regulation can provide.

We have workers who are required to work in certain parts of the mill where chemicals are always present, we have workers who work in equipment maintenance shops, and are required to use solvents, solders and paints. All of these products are ones which contain both reproductive toxins and sensitizers.

We do not agree with the continued reliance upon the ACGIH list as the only source of information on reproductive toxins and sensitizers. Its' limitations provide minimal protection to our members.

Reproductive toxins which affect the reproductive health of men and women can have lifelong and life altering affects on workers. Exposures can result in sterility, testicular damage , fetal abnormalities, miscarriages and cancers of the reproductive organs.

Young workers of reproductive age have a right to the best possible protection against exposures. It is estimated that 20% of the BC workforce is in this group.

The effects of these reproductive toxins are not evident until it is too late, not until workers find that they are unable to conceive or have a child born with defects. Perhaps the most disturbing fact of these exposures is that they affect the next generation.

Sensitizers are chemicals which may not cause any kind of health affects immediately but on further exposures workers will become allergic.

The development of hypersensitivity is broad and can include skin reactions, occupational asthma and immune disorders. They usually have a lifelong affect on worker health and can be fatal. These chemicals can be found in solvents and paints to name a few.

Reproductive toxins and sensitizers can have drastic affects on

the health of workers and the WCB is obligated to provide the best regulatory protection for them.

This year for the first time the fatalities from occupational diseases and illnesses were greater than traumatic deaths. This is the time to strengthen Part 5 .

In the pre-consultation meeting which was held last September with the WCB, labour and employer stakeholders, it was agreed upon to provide workers with better protection by recommending that in addition to the reference to the ACGIH designations in Section 5.57. 1 (b) and (c), item (e) be added as follows

(e) Classified under WHMIS CPR 53 or 55 as a developmental or reproductive toxin subdivision A or Division 2 of Class D- Poisonous and Infectious Material

WHMIS is the recognized system in Canada and established the legal requirements for the identification of hazardous substances at workplaces. Due to the requirements of the Material Safety Data Sheets the WHMIS list must be kept up to date. There is a requirement in Part 5 that Material Safety Data Sheets be updated by employers every three years. For this reason the WHMIS system is a much more reliable source of information on the designations for reproductive toxins and sensitizers.

Adopting the WHMIS list of reproductive toxins and sensitizers will provide consistency with the Material Safety Data Sheets. Workers and employers may be confused by the reference to two different systems.

Recommendation:

The WCB Board of Directors to revise the proposed amendment change to include item (e)

(e) Classified under WHMIS CPR 53 or 55 as a developmental or reproductive toxin, subdivision A of Division 2 of Class D-Poisonous and Infectious Material.

CEP Local 603 urges the WCB to take seriously our recommendation. We believe that this will provide our members with the best protection against exposures to reproductive toxins and sensitizers.

Section 5.58 Protective Policy

The CEP Local 603 agrees with this amendment and recommends that the WCB Board of Directors implement