

Alliance for Sharps Safety And Needlestick Prevention

October 11, 2007

Hon. Dalton McGuinty
Premier
Legislative Building, Room 281
Queen's Park, Toronto
M7A1A1

Dear Premier:

Congratulations on your government's impressive electoral victory and your personal re-election in Ottawa South! We look forward to working cooperatively with your government during its new mandate to improve the health and safety of front-line health care workers.

The Alliance for Sharps Safety and Needlestick Prevention wishes to congratulate and thank you for the enactment of Regulation 474/07 under the Occupational Health and Safety Act, regarding needle safety, in August 2007. This is an important and positive step forward, which will result in improved workplace safety for large numbers of hospital health care workers. Life-threatening injuries, permanent disability and possibly death from blood borne pathogens will be reduced.

In view of the fact that significant implementation of safety-engineered medical sharps already is underway across the province and Regulation 474 does not come into effect for almost another year, we want to bring to your attention and recommend relatively minor improvements to Regulation 474. These are completely consistent with the intent of the Regulation and would further reduce the risk of injury from medical sharps to health care workers, thus enhancing the protections it contains.

Recommendations:

- ▶ Re-focus the regulation from "hollow-bore needles" and "safety-engineered needles" to "medical sharps" and "safety-engineered medical sharps"
- ▶ Require that when a worker is to do work requiring the use of a medical sharp, the employer shall provide the worker with a safety-engineered medical sharp that is appropriate for the work
- ▶ Indicate that the Regulation applies to long-term care homes, psychiatric facilities, laboratories and specimen collection centres effective September 1, 2009 and to other health care workplaces effective September, 2010.

These changes would ensure principally that scalpels and suture needles would be included in the scope of devices from which health care workers need protection and provide protection to all frontline health care workers (see details, appended).

Your government has recognized the importance of such protections and we trust that it will consider these recommendations between now and O. Reg. 474/07's coming into force.

Alliance for Sharps Safety and Needlestick Prevention

Yours sincerely,

Chuck Rachlis
Vice President, SAMCI
(On behalf of the Alliance)

cc: Linda Haslam-Stroud, President, ONA
Sharleen Stewart, President, SEIU Local 1.0n
Warren (Smokey) Thomas, President, OPSEU
Sid Ryan, President, CUPE Ontario

Alliance for Sharps Safety and Needlestick Prevention

Recommended Changes to Ontario Regulation 474/07

Section 1 **Replace with the following:**

“In this Regulation,

“safety-engineered sharp” means,

- (a) a medical sharp with a built-in safety feature or mechanism that,
 - (i) eliminates or minimizes the risk of accidental parenteral contact, and
 - (ii) is approved by Health Canada, or
- (b) a needleless device that,
 - (i) replaces a medical sharp, and
 - (ii) is licensed as a medical device by Health Canada.”

Section 1 **Add the following section:**

"parenteral" means a route of entry that is through the skin or mucous membrane, and includes subcutaneous, intramuscular and intravascular routes of entry.

Section 2 **Add new #4 and #5 as follows:**

- 4. All long-term care homes, psychiatric facilities, laboratories and specimen collection centres, effective September 1, 2009
- 5. All other health care workplaces, including home care settings, doctor's offices, and ambulances, effective September 1, 2010

Sec. 3 and 4 **Replace “hollow bore needle” with “medical sharp” and “safety-engineered needle” with “safety-engineered medical sharp”**

Alliance for Sharps Safety and Needlestick Prevention

October 11, 2007

Hon. George Smitherman
Minister of Health & Long-Term Care
Hepburn Block, 10th Floor
80 Grosvenor Street
Toronto M7A 2C4

Dear Minister Smitherman:

Congratulations on your government's impressive electoral victory and your personal re-election in Toronto Centre! We look forward to working cooperatively with your government during its new mandate to improve the health and safety of front-line health care workers.

The Alliance for Sharps Safety and Needlestick Prevention wishes to congratulate and thank you for the enactment of Regulation 474/07 under the Occupational Health and Safety Act, regarding needle safety, in August 2007. This is an important and positive step forward, which will result in improved workplace safety for large numbers of hospital health care workers. Life-threatening injuries, permanent disability and possibly death from blood borne pathogens will be reduced.

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Alliance for Sharps Safety and Needlestick Prevention

October 11, 2007

Hon. Steve Peters
Minister of Labour
14th Floor, 400 University Avenue
Toronto M7A 1T7

Dear Minister Peters:

Congratulations on your government's impressive electoral victory and your personal re-election in Elgin-Middlesex-London! We look forward to working cooperatively with your government during its new mandate to improve the health and safety of front-line health care workers.

The Alliance for Sharps Safety and Needlestick Prevention wishes to congratulate and thank you for the enactment of Regulation 474/07 under the Occupational Health and Safety Act, regarding needle safety, in August 2007. This is an important and positive step forward, which will result in improved workplace safety for large numbers of hospital health care workers. Life-threatening injuries, permanent disability and possibly death from blood borne pathogens will be reduced.

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