

Alliance for Sharps Safety And Needlestick Prevention

October 31, 2007

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

Dear Premier:

The Alliance wrote to you on October 11, to congratulate and thank you for the enactment of Regulation 474/07 under the Occupational Health and Safety Act, and to recommend changes in the Regulation, to further reduce the risk of injury to health care workers, by enhancing the protections it contains.

Since then, we have had the opportunity to discuss O. Reg. 474/07 with our members. They feel strongly that the protections in the regulation ought to be available to all health care workers as soon as possible. Regulation 474/07 is silent about application to sectors other than hospitals. In announcing it, Minister Smitherman indicated that the government "intends to mandate the use of safety engineered needles or needle-less systems in long-term care homes, psychiatric facilities, laboratories and specimen collection centres in 2009 and in other health care workplaces (home care, doctor's offices, ambulances, etc.) in 2010." Premier, our members do not understand the rationale for these additional delays.

In our view, all health care workers are entitled to the same protection, and should not have to wait an additional 12 or 24 months to be protected, because of where they work in Ontario. Accordingly, we call on your government both to make the changes we have recommended previously, and to further amend O. Reg. 474/07 so that it applies to all health care workplaces, effective September 1, 2008.

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.

Thank you for your consideration.

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 #5 and #6, as follows:**

- 5. Every long-term care home, psychiatric facility, laboratory, specimen collection centre, home care setting, doctor's office, and ambulance;
- 6. All other health care workplaces.

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 31, 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 reappointment as Minister of Health and Long-Term Care! We wish you well and look forward to working cooperatively with you and your government during its new mandate to improve the health and safety of front-line health care workers.

The Alliance wrote to you on October 11, to congratulate and thank you for the enactment of Regulation 474/07 under the Occupational Health and Safety Act, and to recommend changes in the Regulation, to further reduce the risk of injury to health care workers, by enhancing the protections it contains.

Since then, we have had the opportunity to discuss O. Reg. 474/07 with our members. They feel strongly that the protections in the regulation ought to be available to all health care workers as soon as possible. Regulation 474/07 is silent about application to sectors other than hospitals. In announcing it, you indicated that the government "intends to mandate the use of safety engineered needles or needle-less systems in long-term care homes, psychiatric facilities, laboratories and specimen collection centres in 2009 and in other health care workplaces (home care, doctor's offices, ambulances, etc.) in 2010." Minister, our members do not understand the rationale for these additional delays.

In our view, all health care workers are entitled to the same protection, and should not have to wait an additional 12 or 24 months to be protected, because of where they work in Ontario. Accordingly, we call on your government both to make the changes we have recommended previously, and to further amend O. Reg. 474/07 so that it applies to all health care workplaces, effective September 1, 2008.

Thank you for your consideration.

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 #5 and #6, as follows:**

- 5. Every long-term care home, psychiatric facility, laboratory, specimen collection centre, home care setting, doctor's office, and ambulance;
- 6. All other health care workplaces.

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 31, 2007

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

Dear Minister Duguid:

Congratulations on your appointment as Minister of Labour! We wish you well and look forward to working cooperatively with you and your government during its new mandate to improve the health and safety of front-line health care workers.

The Alliance wrote to your predecessor on October 11, to congratulate and thank him for enacting Regulation 474/07 under the Occupational Health and Safety Act, and to recommend changes in the Regulation, to further reduce the risk of injury to health care workers, by enhancing its protections.

Since then, we have had the opportunity to discuss O. Reg. 474/07 with our members. They feel strongly that the protections in the regulation ought to be available to all health care workers as soon as possible. Regulation 474/07 is silent about application to sectors other than hospitals. In announcing it, you indicated that the government "intends to mandate the use of safety engineered needles or needle-less systems in long-term care homes, psychiatric facilities, laboratories and specimen collection centres in 2009 and in other health care workplaces (home care, doctor's offices, ambulances, etc.) in 2010." Minister, our members do not understand the rationale for these additional delays.

In our view, all health care workers are entitled to the same protection, and should not have to wait an additional 12 or 24 months to be protected, because of where they work in Ontario. Accordingly, we call on your government both to make the changes we have recommended previously, and to further amend O. Reg. 474/07 so that it applies to all health care workplaces, effective September 1, 2008.

Thank you for your consideration.

Yours sincerely,

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

cc: Linda Haslam-Stroud, President, ONA
Sharleen Stewart, President, SEIU Local 1.on;
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 #5 and #6, as follows:**

- 5. Every long-term care home, psychiatric facility, laboratory, specimen collection centre, home care setting, doctor's office, and ambulance;
- 6. All other health care workplaces.

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