

Grey Bruce Labour Council

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Canadian Nuclear Safety Commission

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RE: Fitness for Duty Regulation DOC 2.2.4

The Grey Bruce Labour Council is the voice of working people in Grey and Bruce Counties.

We have reviewed the above draft regulation and wish to register our comments.

As indicated in the document, initially the proposal will only cover the workers at the Canadian Nuclear Power Plants. We believe that in the future this regulation may be applied to other nuclear licensees.

We endorse and support that all workers should be fit for duty. The Unions that make up the Labour Council work with Employers to ensure that proper processes and support systems are in place to assist workers with problems related to alcohol and drug use. We firmly believe that the current programs in place in this regard are sufficient and that random drug testing is not required.

As co-workers, union members, and leaders in our unions we work hard to ensure that workers report near miss incidents and workplace accidents no matter how small. This has resulted in a good safety culture in our workplaces and has preempted similar incidents by proactively correcting issues that may have contributed to further events. The introduction of random drug and alcohol testing for post incident events will destroy this self-reporting culture and result in a significant reduction in accident and incident reporting in our workplace.

Workers do not trust Drug and Alcohol tests. There are many unknowns and myths in regards to this form of testing.

In conclusion the Grey-Bruce Labour Council believes that random Drug & Alcohol testing has no place in the nuclear industry workplaces.

Yours sincerely

 7 Mar 2016

Vice-President, Grey Bruce Labour Council