



USW Local 1568
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Canadian Nuclear Safety Commission
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consultations@cnsccsn.gc.ca

RE: Fitness for Duty Regulation DOC 2.2.4

Our union, Local 1568 of United Steelworkers, represents approximately 500 workers at Canadian Nuclear Laboratories, Chalk River Labs. Our members work as technicians and technologists in a number of disciplines.

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

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 apply to other nuclear licensees.

Our facility is not a NPP but we do have concerns with this proposal.

As a Union we endorse and support that all workers should be fit for duty. We work with our Employer 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 union 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 workplace 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 our Union believes that random Drug & Alcohol testing has no place in the nuclear industry workplaces.

Yours sincerely



Vickie Hulley

President USW 1568