

### ***Needle Safety Regulatory Review***

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Dear Mr. Vander Doelen and Mr. Amodeo,

The Registered Nurses' Association of Ontario (RNAO) is pleased to provide feedback on the proposal to extend the scope of the Needle Safety Regulation (O. Reg. 474/07), made under the *Occupational Health and Safety Act*. RNAO is the professional organization representing registered nurses who practice in all roles and sectors across the province.

RNAO supports the extension of the scope of the Needle Safety Regulation and Enforcement to include those identified in the proposal: long-term care homes; designated psychiatric facilities not captured in the current regulation (i.e., those that provide out-patient and other services under the Mental Health Act); laboratories; and specimen collection centres. In addition, RNAO strongly recommends that the Ministry of Labour and the Ministry of Health and Long-Term Care move quickly to extend the scope of Needle Safety Regulation to all areas that provide health care including community settings such as primary care, public health, home care, home care, and any other area where health care is provided.

Nurses exposed to sharps are at an increased risk of needle stick injuries regardless of whether they practice in acute care, long-term care, or community settings. This type of injury can lead to serious or fatal blood borne infections such as Hepatitis B, Hepatitis C, and Human Immunodeficiency Virus (HIV).

The 2005 National Survey of the Work and Health of Nurses identified that 48.4% of all nurses surveyed had sustained a needlestick or other sharps injury in their career, with 11.4% of these occurring within the previous twelve months. These findings were consistent across practice settings, including hospital (51.9% in career, 12.4% in previous 12 months), long term care (37.3% in career, 10.4% in previous 12 months), and community health (46.6 % in career, 8.8% in previous 12 months).<sup>1</sup> The utilization of safety engineered devices has shown to decrease injuries by 62%-88%.<sup>2</sup>

Given the serious implications of needlestick injuries on the health of individuals and the collective sustainability of the nursing workforce, it is imperative that these regulations on the use of safety-engineered needles be quickly implemented to safeguard the health of nurses and others at risk.

Thank you for the opportunity to participate in this consultation to extend the scope of the Needle Safety Regulation (O. Reg. 474/07).

Sincerely,

A handwritten signature in cursive script that reads "Gail Beatty".

Gail Beatty RN, MN  
Nursing Policy Analyst  
Registered Nurses' Association of Ontario

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<sup>1</sup> Statistics Canada & Health Canada. (2006). National Survey of the Work and Health of Nurses. *Canadian Institute for Health Information*, pg. 132.

<sup>2</sup> National Institute for Occupational Safety and Health (NIOSH) (1999). Preventing needle stick injuries in health care settings. Available: <http://www.cdc.gov/niosh/pdfs/2000-108.pdf>