

From: Bill Hynd
To: [Phillips, Kim \(NRCan/RNCan\)](#)
Cc: "[Mary Shortall](#)"
Subject: Offshore safety initiative response
Date: December 8, 2017 09:04:48

Hi Kim,

The Newfoundland and Labrador Federation of Labour appreciates the opportunity to participate in the Atlantic Offshore OHS Initiative. As to the Proposed Policy Intent for Phase 3 of Atlantic OHS Regulations.

A couple of comments:

Pg 12. OHS Program Section 3) An Employer that is required to develop, implement and maintain an OHS program

- a) Review and, where necessary, revise the OHS program at least every 3 years, or:
 - 1. where there is a change of circumstances that may affect the health and safety of persons in the workplace; **THIS NEEDS TO BE CLARIFIED.** Can we name an example? What would a change of circumstance include?

Pg 15.

Section 12 General Training 1b) reads “regulatory awareness, including Employee rights and responsibilities (and reprisal)”. **WE OBJECT TO (and reprisal).** Please remove. It is both unnecessary and unwelcome.

Section 15.

Subsection 1 states an impaired employee must not work due to the possibility of being hazardous to the health and safety of other workplace employees.

Yet subsection 2 overrides subsection 1 and seems to imply that an impaired worker is able in the event of an emergency. **WHAT KIND OF EMERGENCY WOULD WARRANT AN IMPAIRED INDIVIDUAL WORKING?**

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Safety First.