



**CANADIAN NUCLEAR WORKERS COUNCIL'S (CNWC)
COMMENTS ON**

CNSC Safety Culture REGDOC-2.1.2

January 31, 2017

The Canadian Nuclear Workers Council (CNWC) is the collective voice of organized labour in Canada's Nuclear Industries.

Our member Unions are located in Saskatchewan, Manitoba, Ontario, and New Brunswick. More information about the CNWC can be found at www.cnwc-cctn.ca The CNWC as well as some of our member Unions provided comments on this topic in 2013.

As a labour organization the CNWC supports a strong safety culture. Overall we believe that there is a good safety culture across the nuclear industry. There are some gaps and a need to ensure constant improvements in safety.

The CNWC will provide comments in the following areas of the draft regulation:

- **General Safety Culture**
- **Safety Culture Assessments**

General Safety Culture

In Nuclear Industry workplaces there are three different groups of workers. These groups consist of regular staff of which the majority are Unionized, Construction Trades which are Unionized, & non- unionized contactor staff.

We submit that unionized workers normally have a better safety culture versus non – unionized workers. The reason for this is that Unions are very supportive of safety for their members and fully support workers that raise safety issues.

Looking at regular full time workers. These workers in most cases have additional health & safety provisions in their collective agreements & workplace safety is a priority. These workers generally have a good safety culture but from time to time there are incidents where these workers feel intimidated into raising safety issues.

Unionized construction workers are also very safety oriented and have the support of their Union when they raise safety concerns. These workers are normally hired through a Union Hiring Hall. Their time on the job varies on the type of project that they are working on so each day of work they are working towards their last day for when the project is completed. As the work winds down there are layoffs. Some of our member unions have indicated that some of their members at times who raise safety concerns are the first to be laid off. This concern/threat naturally affects the safety culture.

Non-unionized workers face a similar if not more serious situation when they raise safety issues. Fortunately, these types of incidents occur minimally but in reality do occur.

We suggest that the above scenarios issue need to be addressed in **Section 2 Fostering Safety Culture.**

Safety Culture Assessments Section 3

The CNWC and our member Unions fully support Safety Culture assessments. Done correctly these assessments can identify gaps in the culture.

Independent Assessments

The CNWC supports these types of assessments but suggests that they are only required on an intermittent basis provided that the self-assessments are performed satisfactorily. The regulation should stipulate the frequency of independent assessments.

Self-Assessments

The CNWC supports these types of assessment provided the following conditions are met:

- The worksite unions are allowed to appoint one or more representatives to the assessment team.
- The majority of the team members are from worksite external to the workplace being assessed.
- Discipline or contemplation of discipline will not form part of any recommendations.

Assessment team selection

The CNWC suggest the following wording:

The overall team should reflect a balanced representation of the above, ~~including consideration~~ **shall include Union appointed representatives (where applicable), & of-worker demographics (age, gender, union representatives).**

Thank you for the opportunity to comment. If further information is required please contact us.

David Shier
CNWC National Director