

From: [Consultation \(CNSC/CCSN\)](#)
To: [Churchill, Jason \(CNSC/CCSN\)](#)
Subject: FW: Submissions of PIPSC on the CNSC's REGDOC-2.2.4 Fitness for Duty
Date: Monday, June 13, 2016 6:36:21 AM

Received through the consultation account.

From: Gervais, Aurèle (CNSC/CCSN) **On Behalf Of** Media relations / Relations avec les médias (CNSC/CCSN)
Sent: June-10-16 3:33 PM
To: Consultation (CNSC/CCSN)
Cc: Information (CNSC/CCSN)
Subject: FW: Submissions of PIPSC on the CNSC's REGDOC-2.2.4 Fitness for Duty

Comments regarding REGDOC-2.2.4

From: Dejan Tonic [mailto:dtoncic@pipsc.ca]
Sent: June-10-16 3:30 PM
To: Media relations / Relations avec les médias (CNSC/CCSN)
Subject: Submissions of PIPSC on the CNSC's REGDOC-2.2.4 Fitness for Duty

The Professional Institute of the Public Service of Canada (PIPSC) was founded in 1920. With over 57,000 members, the Institute is the largest union in Canada representing scientists and professionals employed at the federal and some provincial and territorial levels of government.

Our members help ensure that the use of nuclear energy in Canada does not pose undue risk to health, safety, security and the environment consistent with the mandate of the Employer.

In having reviewed the Canadian Nuclear Safety Commission's November 2015 draft regulatory document REGDOC-2.2.4, Fitness for Duty, PIPSC maintains the same position it has held in response to Fitness for Duty 2012.

In essence, it is PIPSC's position that alcohol and drug testing violates the rights of the individual.

The case law has confirmed that employee privacy rights play a significant role in the balancing of privacy and safety interests as it pertains to drug and alcohol testing.

Not only is it a employee privacy violation, alcohol and drug testing it has been determined that it may provide false results; and it is a violation of human rights and dignity.

As it was held in 2012, PIPSC maintains that screening for alcohol and drugs does not guarantee safety in the workplace, nor does it identify work dysfunction or provide for resolution of problems associated with the use of alcohol or other drugs. Available drug tests do not measure impairment, how much was used or when it was used. They can only determine past drug exposure.

Awareness, education, effective interventions and rehabilitation are the most effective ways of

ensuring that performance issues associated with alcohol and drug use are detected and resolved.

PIPSC is appreciative of the opportunity to make submissions on this very important issue.

We respectfully reserve our right to make such other submissions and representations as need be.

We would welcome to meet the CNSC on this matter with the stakeholders.

All of which is respectfully submitted

Dejan Tonicic

Employment Relations Officer
Agent des relations du travail
tel: 1-800-267-0446 ext. 2237
Fax: 1-800-465-7477
dtoncic@pipsc.ca
www.pipsc.ca

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