



Canadian Nuclear Workers' Council

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November 12, 2019

Louise Levert
Secretariat
Canadian Nuclear Safety Commission
280 Slater St. P.O. Box 1046
Ottawa, Ontario
K1P 5S9

Ms. Levert:

RE: Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2018

Please include this submission for the December 11, 2019 meeting of the Commission.

The Canadian Nuclear Workers Council (CNWC) is the **Collective voice of the Labour Unions that represent workers in Canada's Nuclear Industry.**

The CNWC is in full support of the annual assessment process. It should be noted that the presence of the Unions in these workplaces provides another level of oversight for the issues assessed in these reports.

We have reviewed the above report, in consultation with our member unions at each of the facilities listed below.

Cameco's Fuel Processing Facility (CFPF) in Port Hope .USW 13173 & 8562

BWXT Nuclear Energy Canada facilities in Toronto UNIFOR 524

BWXT Nuclear Energy Canada Peterborough – UNIFOR 252, 599, & IFPTE 164

The Canadian Nuclear Workers' Council is comprised of Locals of the following unions: Canadian Union of Public Employees, International Association of Firefighters, International Association of Machinists & Aerospace Workers, International Brotherhood of Electrical Workers, Power Workers' Union, Professional Institute of the Public Service, Society of Energy Professionals, United Steelworkers, and Union for Canada (UNIFOR), Union of Professional Engineers and Associates. & the following organizations: Grey Bruce Labour Council, Northumberland Labour Council, Durham Region Labour Council, & the Ontario Building and Construction Trades Council.

It should be noted that these local Unions are affiliated with the main USW, UNIFOR, & IFPTE National Unions. These Unions all place worker safety very high on their agendas, Each of these Unions have designated Health & Safety Staff which are available if needed to assist the above local unions with any worker safety issues.

The CNWC and our member unions take the issue of worker health & safety very seriously. Our member unions work very closely with their employers on worker safety. All of these facilities have joint health and safety committees (JHSC) where the unions appoint the worker representatives. These unions all have additional provisions in their collective agreements for Health & Safety that exceeds legislative provisions. Union representatives participate on radiation protection ALARA committees. Union health and safety representatives inspect their workplaces on a regular basis and are in contact with workers on a daily basis. This, plus additional legislative provisions that apply to union representatives, ensures that any health and safety issues is addressed and resolved promptly. Workers are encouraged to report any safety issues and have the right to refuse unsafe work.

Union representatives also have access to CNSC inspectors if the need arises to help resolve worker safety issues.

Safe workplaces result in public safety and a safe environment. Workers in these facilities live in the vicinity of their workplaces and are therefore concerned with a safe environment. Workers report any environmental issues and have the support of their union and their employer.

CNWC member unions meet annually. This provides an opportunity for dialogue on worker safety issues where representatives can learn best practices from one another. Many of our CNWC delegates have toured these facilities over the years and have witnessed firsthand the good safety culture.

The CNWC is in full support of the CNSC's staffs' findings that facilities identified above met the performance expectations for the health & safety of workers and the protection of the environment for 2017.

The CNWC commends the workplace parties for achieving a satisfactory rating by the CNSC staff for the worker safety and health in 2017. However, we challenge them to strive for a "Fully Satisfactory" rating for 2018.

Respectfully submitted,

David Shier
National Director