



Strategic Directions

**Addressing the Risk of
Workplace Violence
in Nova Scotia**

NS Department of Environment & Labour

December 2006

Table of Contents

Introduction	1
Definition of Workplace Violence	1
Problem Definition	1
Statistics (Workers Compensation Board)	2
Current Summary of Activity	3
Canada	3
Nova Scotia	4
The Plan	4
Development of Workplace Violence Strategy	4
Education and Awareness	5
Legislation and Regulation	5
Partnership Development	5
Compliance Promotion	6
Good Practice Definition	6
Research and Measures	6
Economic Incentives	6
Other Initiatives	6
APPENDICES	7
Appendix A	
Proposed regulatory content in plain language	8
Appendix B	
Useful links to resources	18
Your Comments	19

Introduction

The Minister of Environment and Labour has included strategies for reducing injuries from workplace violence in the Department's 2006-2007 Business Plan. This is part of a four-year review of the department's Occupational Health and Safety regulatory framework. The Occupational Health and Safety Advisory Council, an employer/employee committee which advises the Minister on workplace safety, has also identified violence as a priority for action.

This discussion paper is considered the next step in designing a comprehensive strategy. The results of the input will help the Department develop workplace violence strategies within this fiscal year. The paper provides background information on the extent of the problem in NS and outlines some potential solutions, including the use of regulations and other strategic elements. We encourage you to review the document and provide your input into the design and implementation of a strategy to reduce the risk of violence in workplaces.

The Definition of Workplace Violence

Currently the occupational health and safety legislation of the province does not have a definition of workplace violence. Operationally, the OHS Division has used a definition that was developed by the OHS Advisory Council in its recommendations for *Violence in the Workplace Regulations*:

“...the attempted, threatened or actual conduct of a person that endangers the health or safety of an employee, including any threatening statement or threatening behaviour that gives an employee reasonable cause to believe that the employee is at risk of injury”.

A definition of workplace violence that is too broad could hamper efforts to address the behaviours that are measurable and known to be serious problems (see below). There is no question that gossip, bullying, and other forms of intimidation are problems. However, they are difficult to define for occupational health and safety purposes, and may be better addressed through human resource strategies.

Problem Definition

Violence can be seen in the workplace in a number of ways. Primarily, workplace violence is associated with the occupational setting, in which the risk factors are linked to the nature of work that is being done. This includes work where there is a reasonable expectation that violent incidents will occur based on established, well-documented, risk factors.

There may be other violent incidents that occur in workplaces, such as spousal violence and/or criminal acts. In some cases these incidents can be anticipated and addressed, while other incidents may occur with no forewarning or predictability.

Several factors have been identified across industry as putting a workplace at risk for violence:

Factor	Examples of workplaces/occupations
Handling money	Sales staff, banks, delivery drivers
Dealing with troubled clients, or caring for others	Emergency rooms, crisis centres, hospitals, long-term care
Providing service to the public	Bus drivers, government front-line employees gas attendants, retail, taxis
Exerting control over others/security functions	Enforcement officers, bartenders/staff, police, security functions
Inspecting	Building inspectors, assessors, OHS officers environment inspectors, agriculture inspectors
Selling or dispensing alcohol, drugs or cigarettes	Liquor stores, drug stores, retailers
Handling or selling firearms	Retailers, police

Statistics from Workers Compensation Board

The Workers' Compensation Board is the primary source of statistical information available to the OHS Division. Since 2002, there have been 1,768 WCB claims where the cause of injury is "act of violence," with a total claim costs of \$2,001,370. On average there are 412 claims per year (approx. 1.2 % of total claims per year) costing an average of \$417,973 per year (approx. 0.3 % of total claim costs per year).

In 2005, the WCB began coding intentional and unintentional acts of violence and documented 629 claims (1.8% of total claims). The majority of claims fell under healthcare/social services (407 claims or 65%); government services such as correctional facilities (80 claims or 13%); and retail trade (20 claims or 3%).

The behaviours that were identified as causing the problem included:

1.	assaults/violent acts by persons not specified	188 incidents	30%
2.	hitting, kicking, beating	155	25%
3.	squeezing, pinching, scratching, twisting	88	14%
4.	violent acts unspecified	88	14%
5.	biting	47	7%
6.	all other	143	10%

It is widely agreed by OHS professionals and researchers that WCB claims data is an underestimation of the number of workplace violence incidents. This is particularly true in the health and government services sector, where surveys by government agencies and academics indicate a higher rate of violent incidents. Not all workplaces have WCB coverage. For example, the education sector is only partially covered by

WCB and complete statistics are not available. However, a review of WCB statistics does identify key sectors where government should concentrate efforts. The vast majority of WCB claims (78%) and costs (73%) are in two public sectors:

Sector	% of Total Claims	% of Claims Costs
Health and Social Services	65	50
Government Services	13	23
Retail/Accom./Food & Bev.	3	8
Remaining sectors	19	19

As outlined, there is a need for more action on addressing workplace violence within the public health and social service sectors and the broader public service.

Also of concern are workplaces where risk factors are high and where individuals - in order to support themselves and their families - work in environments that are vulnerable to acts of violence. There have been three violence related fatalities since 2001. Two in the taxi industry and one in a convenience store.

Violence in the workplace is a significant issue since. It poses a risk to the health and well being of working people in Nova Scotia and has a negative effect on working environments, insurance costs and the health care system.

Current Summary of Activity

Canada

Across Canada, approaches to workplace violence vary. British Columbia, Alberta, Prince Edward Island, and Saskatchewan have specific occupational health and safety violence regulations. Manitoba has regulations that will be effective in spring 2007. The Canada Labour Code explicitly recognizes violence as a hazard, and requires employers to take steps to address it. The remaining jurisdictions rely on general duty clauses. Northwest Territories / Nunavut is currently consulting on draft regulations specific to workplace violence.

All jurisdictions provide support materials and have some form of programming focussed on the issue of workplace violence.

NSEL is also a participating member on the Canadian Association of Administrators and Labour Legislators and a lead member of its OHS Violence sub-committee. An inventory of programs addressing workplace violence is expected to be released in Fall 2007.

Nova Scotia

A number of organizations have identified workplace violence as an issue that needs more attention and action to improve workplace protection. Agencies with responsibilities in this area are increasingly concerned about violence in the workplace and are developing initiatives to address the problem. In some industry sectors, both employers and employees have recognized the problem, and developed and implemented programming.

The WCB, which works closely with our OHS Division, has put programs in place to respond to their assigned mandate of accident prevention in the workplace.

The OHS Division employs an inspection staff that does address workplace violence issues identified in the course of their work. OHS Division officers have written orders using the “general duty” provisions of the *Occupational Health and Safety Act* to address workplace violence. Briefly, the general duty provisions require employers to protect employees against foreseeable hazards, which can include workplace violence.

Targeted inspections have been conducted to raise awareness in workplaces. The OHS Division’s website has a section dedicated to workplace violence and links to other resources and information pertaining to workplace violence. The OHS Division has developed education materials in partnership with other agencies and will continue to focus on getting that information to the workplaces that will benefit from it.

The Department is considering the draft *Violence in the Workplace Regulations* proposed by the OHS Advisory Council, which could form part of the strategy. Although regulations are important, they are only one part of the equation. They must be used in concert with the other program elements to be effective.

There are also private sector consultants in the province who offer expertise in this area, and some employers have already implemented measures to reduce the risk of violence in their workplaces.

These are all good initiatives and can form part of the foundation for building a comprehensive and effective strategy.

The Plan

Nova Scotia has a good occupational health and safety regime in place. Effective drafting and application of regulations can be an important tool. However, some of the challenges may not be highly amenable to regulatory solutions and must be addressed by other means to protect employees. Finally, any plan must include measurable outcomes to ensure that the strategy is succeeding.

Development of Workplace Violence Strategy

The goal is to reduce incidents and the impacts (physical, emotional, and financial) of workplace violence on employees and employers in NS. Generally speaking, effective prevention of workplace violence seeks to provide employers and employees with the tools, information, and capacity to:

- identify the potential for workplace violence
- develop violence prevention policies and programs suited to the workplace
- train staff in violence prevention

As there is considerable diversity in industry sectors and within the working environment of each sector, (ie. retail large store vs. small convenience, varying hours of work, hospital emergency rooms vs. long term care etc.) a single approach and solution to this issue is unrealistic. Each situation requires an approach and solution that reflects the specific needs of that workplace. There are a number of potential instruments that government, stakeholders, employers and employees might use in combination to create a comprehensive strategy. For the purposes of this strategy, the following elements are put forth for consideration.

Education and Awareness

An effective way to address workplace violence and its impact is to raise awareness in all workplaces and support activities with educational materials and resources. The concept is to provide information to increase awareness about risk factors that contribute to workplace violence as well as approaches to prevention. Employer education will be a major focus. The department will look for opportunities to partner with others to respond to the need.

Legislation and Regulation

The most important reason to develop and apply regulations is that it establishes a clear line of accountability and in this case provides further clarification of current responsibilities under the general duty clauses pursuant to the *OHS Act*. NSEL has received a regulation proposal from the OHS Advisory Council to help address violence in the workplace. If adopted, it is important that the regulations make sense, are readily understood by employers and employees and are promoted and facilitate compliance. NSEL will develop programming to assist sectors and organizations to get ready for regulations before they come into force.

These rules would be considered as part of a plan that will focus on those industry sectors where the problem of workplace violence is most acute. It will be necessary to establish measurable outcomes to ensure that changes in law are creating the desired effect of reducing violence in the workplace.

It is important to remember that workplace violence as defined in this discussion paper is already covered in the *OHS Act*. The role of regulations would strengthen the legislation by confirming that this is the case and outlining a process for addressing workplace violence. The process must be flexible enough to recognize and allow for variable approaches and solutions that reflect the specific needs of each workplace. The proposed regulatory content in plain language is attached. (Appendix A)

Partnership Development

There are many partners that have an interest in the issue and with whom the OHS Division can combine resources to develop and deliver effective programming. One example is the prevention of workplace violence program of the WCB.

Compliance Promotion

This means establishing clear standards, providing information and services, conducting inspections and communicating risk factors and current good practice with the aim of improving performance. The OHS Division can use the existing provisions of the *OHS Act* and its current resources to effect change in workplaces.

Good Practice Definition

A code of practice is an organization-specific document that generally outlines best practices for a specific task or type of operation. Codes of practice to address workplace violence can be developed for sectors where they do not already exist.

Research and Measures

We can conduct research and use the research of other credible organizations to develop measures to track the extent of the problem in the province. The measures can then be used as a gauge of provincial performance and relative change as initiatives unfold.

Economic Incentives

In some areas, economic incentives such as tax relief, insurance deductions can encourage employers to address workplace violence. There are costs to employees, employers, and governments associated with workplace violence. These include work-time losses, treatment costs and insurance premiums. A business case for loss prevention could be created if cost savings are identifiable.

Other Initiatives

There are many organizations within NS and elsewhere in Canada that are working to address workplace violence. The government encourages these initiatives and will look for ways to facilitate their adoption within the province through potential resource support, identifying partnership opportunities and the sharing of research and information. In some cases, resources such as those identified in Appendix B, are already available and can be accessed to support workplace initiatives.

APPENDICES

Appendix A

Proposed Regulatory Changes to Reduce the Risk of Workplace Violence

The Problem

Workplace health and safety hazards affecting employees have traditionally been viewed as arising from unsafe work practices, hazardous industrial conditions, or exposures to harmful chemical, biological or physical agents. Today, violence towards workers, arising out of the course of their work, is also a growing and serious occupational hazard.

Violence can be seen in the workplace in a number of ways. The risk factors are linked to the nature of work that is being done. This includes work at which there is a reasonable expectation that incidents of violence will occur based on well documented risk factors.

There may be other violent incidents that occur in workplaces such as spousal violence and/or criminal acts. In some cases these incidents can be anticipated and addressed while other incidents may occur with no fore warning or ability to predict.

Violence occurs in many forms ranging from verbal assault and threatening statements, to physical assault and fatalities. Whatever the form, the health and safety of an employee is affected. There are many negative outcomes of violence, both in human terms and financially.

To the Organization: Lost work time; decreased work performance and productivity; difficulties between co-workers; staff turnover; reduced morale; reduced public image.

To the Victim: Injury, insomnia; eating disturbances; anxiety; avoidance; fear of work; guilt; self doubt; anger; depression; feeling of helplessness; nervous breakdown.

To Others: Violence against one employee may also have similar negative effects upon other staff members or the clients.

The recognition of violence as an occupational health and safety hazard is important to reduce the risk of violence. Acts of violence claims registered by the NS WCB between 2002 - 2006 totalled 1,768. Eighty percent of the claims occurred in the health and social service, government services and the retail / accommodations / food and beverage sectors.

An extensive consultation in the area of workplace violence was conducted in the 1990s and suggestions were made to develop a new regulation. A proposal was developed based on a 'performance based' regulation, with higher risk workplaces subject to the specific regulatory requirements, to take appropriate based on their assessment of risk specific to that workplace. The process for undertaking that assessment would be established in law by regulation.

The proposed content was developed with the participation of all major stakeholder groups and arrived at through a process of research, the application of workplace experience, negotiation and consensus decision making.

Occupational Health and Safety Act

Employers currently have a general duty under section 13 of the Nova Scotia *Occupational Health and Safety Act* to take every precaution that is reasonable in the circumstances to ensure the health and safety of the persons at or near the workplace. This duty is wide in scope and extends to the protection of employees from incidents of violence.

In some case the Department of Environment and Labour has written orders using the provisions of the *NS OHS Act* to address workplace violence. The OHS Division of the Department of Environment and Labour employs an inspection staff that addresses workplace violence issues they identify in the course of their work.

However, the general duty clause does not define workplace responsibilities specific to violence or appropriate action to eliminate or minimize the risk of workplace violence. Additional regulatory provisions can complement and strengthen the existing legislated obligations.

No changes are proposed or required to the *OHS Act* as sufficient authority, to address the area, presently exists. Additional regulations could, however, create an enforceable standard and clarity in terms of what is required for workplaces to be in compliance.

Definition

Add a Definition of Workplace Violence:

There is no definition of violence in the *OHS Act*. The addition of a specific definition adds clarity for employers and employees, and for OHS officers.

The proposed definition of violence is focussed on the outcome to the employee, irrespective of the assailant. As well, violence should not be limited to only client, customers or others entering the workplace, but includes worker to worker violence. Violence is violence, no distinction is being made between incidents where the violent person is competent or incompetent, or where the act is voluntary or involuntary. Workplace violence can be from anyone to anyone and is violence regardless of the mental state of the assailant. A definition of workplace violence is not intended to replace the legal definition of assault.

The definition below was recommended by the OHS Advisory Council as part of its work on workplace violence regulations during the 1990s and is the definition in their recommendations to the Minister in 2003. This definition is consistent with the definition used by most jurisdictions; some jurisdictions have a more narrow definition while others have a broader definition that includes psychological harassment as an additional category of potential harm.

In considering the definition of violence, it is important to also consider this definition in the context of the *Occupational Health and Safety Act* and system. There are other interpersonal behaviours, such as disrespectful or discriminatory behaviours, that are not appropriate in a productive, healthy workplace. The department believes that these behaviours are more appropriately addressed through human rights legislation and through the human resource management process within the business or organization.

The overall violence strategy and these regulations will be most effective if they result in resources being expended on those issues that the data has identified, and which the Department believes, are causing the most measurable harm. For example, current data from the WCB on claims due to violence indicate the priority behaviours for attention are assaults and violent acts (unspecified), and hitting, kicking, and beating.

Proposed content

“violence” means the attempted, threatened or actual conduct of a person that endangers the health or safety of an employee, including any threatening statement or threatening behaviour that gives an employee reasonable cause to believe that the employee is at risk of injury.

What will this change mean?

The term “violence” will have a defined meaning within the regulation. The focus will be on those behaviours that are causing the most measurable harm.

Focus Attention on Higher Risk Workplaces

The *Occupational Health and Safety Act* is legislation that applies to all provincial workplaces. Under the current legislation, all employers have an obligation to take every precaution that is reasonable to ensure the health and safety of the workplace. This extends to the protection of employees from incidents of violence.

Some types of workplaces are recognized as presenting a higher risk of violent incidents than others. This includes workplaces and occupations that involve caring for others, dealing with troubled clients, exerting control over others, providing service to the public, and handling money, alcohol, drugs or firearms.

In 2005, the Workers' Compensation Board (WCB) began coding intentional and unintentional acts of violence and documented 629 claims which represented 1.8% of total claims. The majority of claims fell under healthcare/social services (407 claims, representing 65% of claims associated with violence); government services such as correctional facilities (80 claims, representing 13% of violence claims); and retail trade (20 claims, representing 3% of violence claims). It is important to note that many incidents are not reflected in these numbers because they are not reported to WCB, or because the workplace is not covered by WCB insurance. Fatalities provide another tragic perspective on risk. There have been 3 violence related fatalities since 2001, two in the taxi industry and one in a convenience store.

The OHS Advisory Council initially recommended in the 1990s that workplace violence regulations should apply to all workplaces in Nova Scotia. In their 2003 recommendations, it was proposed that the regulations be applied to the specific sectors listed below as a compromise solution. More recently, the Advisory Council has recommended that a specific workplace violence regulation apply to all workplaces.

The department is recommending the targeted approach. This recognizes, first, that the "general duty" clause already requires all workplaces to protect employees from injury due to violence, and second, that strategy will be more effective if resources are directed to the workplaces most in need of attention. The focus of attention in the strategy, including proposed regulations, will be on those types of workplaces where risk factors are high and where individuals work in environments that are vulnerable to acts of violence, including death.

Proposed content

The following employers / services must comply with these regulations:

- health care services (small options homes; special-care homes; residential care services; personal care homes, mental health services, hospitals, medical office or clinic, home-support services, respite services, public health services, addiction services, and ambulance services.)
- pharmaceutical-dispensing services
- education services
- police services
- corrections services
- other law enforcement services
- security services
- crisis counselling and intervention services
- retail sales establishments open between 11:00 pm and 6:00 am
- delivery persons servicing the public between 11:00 pm and 6:00 am
- financial services
- sale of alcoholic beverages or provision of premises for consumption of alcoholic beverages.
- taxi services
- transit services which carry passengers
- couriers (i.e. parcel / document delivery)
- government services provided to the public

What will this change mean?

All workplaces will still need to determine whether workplace violence is an issue in their workplace. For those specific workplaces that are identified in the regulation, based on the services provided, will be required to comply with the specific requirements of the regulations.

The application and implementation of the regulations will be phased in to help workplaces come into compliance with these specified requirements.

Hazard Assessments

The first step in dealing with workplace violence is to determine whether a hazard or potential hazard exists. If it does, one must evaluate the size and scope of the hazard. Identification of the conditions, operations and situations that create and contribute to violence, and areas where hazards may develop is the initial step in recognizing violence as a serious workplace hazard to be treated as other occupational hazards.

Proposed content

An employer shall conduct a hazard assessment, in writing, to determine

- the risk, if any, of violence in the workplace; and
- where a risk of violence is identified for the workplace, the size and scope of the risk.

The hazard assessment shall consider,

- previous experience of violence in the workplace; or
- occupational experience of violence in similar workplaces; and
- the presence of interactions or situations that are predictors of violence.

What will this change mean?

Employers subject to the regulation will be required to conduct a hazard assessment

The assessment will consider industry experience and defined risk factors which are predictors of workplace violence. These factors are:

- Hours of operation where there is only one employee
- Staff handling cash/valuables
- Dealing with troubled clients
- Provide service to public
- Caring for others
- Disciplining others
- Deliver or collect items of value
- Exercise control over others
- Inspection duties
- Provide security functions
- Sell or dispense drugs or alcohol
- Handle or deal with firearms or similar weapons
- History of violence

Workplace Violence Prevention Programs

Where the assessment identifies workplace violence as a risk, the risk should be eliminated, if possible, or minimized. A workplace violence prevention program focuses the appropriate workplace resources on the risk of workplace violence.

Proposed content

Where the hazard assessment determines

- there is significant risk that the health or safety of an employee may be endangered by violence; or
- where an officer orders,
- the employer shall develop and maintain, in writing, a workplace violence prevention program to eliminate, if possible, or minimize the risk to employees from violence.

The workplace violence prevention program shall include

- a policy statement;
- work practices and procedures, as appropriate;
- security systems and protective equipment, as appropriate;
- educational programming;
- the means of providing information and training to employees; and
- procedures for reporting, investigating and recording incidents of violence.

What will this change mean?

Where the risk is confirmed by a hazard assessment, a program will need to be defined.

The program to address the risk of violence should contain industry specific elements to effectively address the risks identified. The intent is that the program be flexible in its application so that industry may tailor its solutions to meet specific circumstances of that workplace.

Inform and Support Employees

Information is critical to effectively dealing with violence. Employers need to inform workers about the risk of violence relative to that workplace and provide appropriate support for workers exposed to or impacted by violence.

Proposed content

An employer shall provide information to all employees who are at significant risk from workplace violence with regard to the type of violence and the extent of the risk in the workplace,

An employee subject to an injury or exposed to violence shall have access to

- immediate first aid,
- debriefing or counselling treatment; and,
- be advised to consult a health professional of the employee's choice for treatment or critical incident / trauma counselling; and
- be advised of corrective action taken in response to an incident of violence.

What will this change mean?

Information is required to ensure that employees both understand the risk and what appropriate responses to the risk mean. Training will need to be provided where the assessment identifies the need.

When violent incidents occur in workplaces support is required for those employees involved or impacted by those incidents.

Involve OHS Committees and/or Representatives

Employees need to become informed about the risk of violence relative to that workplace and there must be a real opportunity to have input into the developed resources and tools for use in the workplace.

Proposed content

The workplace violence prevention program shall be developed in consultation with the joint occupational health and safety committee, or in the absence of the committee, a health and safety representative, if any, and shall be made available to employees.

What will this change mean?

The regulation will require the hazard assessment and the program to be developed in consultation with the occupational health and safety committee or the representative for a workplace.

Keep Programs Current

Conditions will change over time and there has to be an ongoing commitment of review any programming put in place.

Proposed content

The employer shall ensure that the workplace violence prevention program is reviewed and, where necessary, revised

What will this change mean?

Ensure that the program in the workplace is maintained current.

Appendix B

Links to selected resources

CCOHS - <http://www.ccohs.ca/products/publications/violence.html>

Canadian Nurses Association - http://www.cna-nurses.ca/CNA/issues/fact/default_e.aspx

Canadian Association of University Teachers- <http://www.caut.ca/en/services/healthandsafety/default.asp>

The Canadian Initiative on Workplace Violence - <http://www.workplaceviolence.ca/research/ciwvpapers.html>

NSEL-OHS - <http://www.gov.ns.ca/enla/healthandsafety/pubs.asp#violence>

Registered Nurses' Association of NS - www.rnans.ns.ca

Workers Compensation Board of PEI - <http://www.wcb.pe.ca/>

Toronto Police Service - <http://www.torontopolice.on.ca/crimeprevention/taxisafety.php>

Ontario Safety Association for Community and Healthcare <http://www.hchsa.on.ca/new/SafInfo/WorkVio.html>

Alberta Human Resources and Employment <http://www3.gov.ab.ca/hre/whs/publications/bulletins.asp>

Worker's Compensation Board of Alberta - <http://www.wcb.ab.ca/workingsafely/violence.asp>

College and Association of Registered Nurses - <http://nurses.ab.ca/issues/violence.html>

Public Safety Agency - http://www.bcpublicservice.ca/wphealth/work_enviro/prevent.htm

WorkSafe BC - http://www.worksafebc.com/publications/health_and_safety/by_topic/general_safety/default.asp

Retail BC - <http://www.retailbc.org/>

Worker's Compensation Board of BC - <http://www2.worksafebc.com/Portals/HealthCare/Violence.asp>

Saskatchewan Department of Labour - <http://www.labour.gov.sk.ca/safety/fast/VIOLENCE.HTM>

Australian Institute of Criminology - <http://www.aic.gov.au/research/cvp/occupational/aic.html>

WorkCover Corporation - <http://www.workcover.com>

Occupational Safety and Health Administration (OSHA) - <http://www.osha.gov/SLTC/workplaceviolence/>

National Institute for Occupational Safety and Health (NIOSH) - <http://www.cdc.gov/niosh/homepage.html>

American Association of Occupational Health Nurses Inc. - http://www.aaohn.org/press_room/workplace_violence_120103.cfm

American Nurses Association - <http://www.nursingworld.org/osh/#brochure>

American Medical Association - <http://www.ama-assn.org/ama/pub/category/3242.html>

Health and Safety Executive - <http://www.hse.gov.uk/violence/index.htm>

Your Comments

The Department of Environment and Labour welcomes your comments on the **Strategic Directions: Addressing the Risk of Workplace Violence in Nova Scotia**. The views of stakeholders are important to the Department in its deliberations to determine the most appropriate government response to address this issue.

Specifically, the Department would appreciate your feedback, before February 15, 2007.

Comments should be forwarded to:

Nova Scotia Environment and Labour
P.O. Box 697
Halifax, NS B3J 2T8

E-mail: policy@gov.ns.ca

Fax: (902) 424-0575

Please contact OHS Information Officer, OHS Division, for any further information or questions.
1-800-952 -2687