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March 7, 2016

To: Canadian Nuclear Safety Commission (CNSC)
280 Slater Street – P.O. Box 1046, Station B
Ottawa, Ontario – K1P 5S9

Re: Human Performance Management – Fitness for Duty - REGDOC-2.2.4

To Whom It May Concern,

As Business Manager of the Provincial Building and Construction Trades Council of Ontario, I would like to comment on your draft regulatory document entitled *Human Performance Management – Fitness for Duty (REGDOC-2.2.4)* which you have shared with stakeholders seeking feedback on the proposals found in the document.

The Provincial Building and Construction Trades Council of Ontario represents 150,000 workers in the construction industry, many of whom work in the nuclear sector. Our members construct, refurbish, and from time to time assist in maintaining Ontario's infrastructure at all nuclear facilities in the province. The health and safety of workers and the general public is our Council's paramount priority and we are absolutely committed to ensuring a drug and alcohol-free workplace while respecting the rights of employees.

With respect to the proposed CNSC document, our Council's position is that we fully adopt, support, and rely on the submission that has been provided to you by the Power Workers' Union (PWU). Thus, we are opposed to the proposed random drug and alcohol testing, on the grounds that it has the potential to violate privacy rights of employees, and because it is unconstitutional.

I have attached a copy of the PWU's submission for your reference, and if you have any questions, please feel free to contact me at patrick@ontariobuildingtrades.com or at (416) 679-8887. Thank you for allowing us the opportunity to share with you, our position on the proposed document.

Sincerely,

Patrick J. Dillon
Business Manager

Provincial Building
and Construction Trades
Council of Ontario