

Specialized Professional Services

8th Floor Labour Building

10808 – 99 Avenue

Edmonton, Alberta T5K 0G5

Telephone 780-427-2687

Fax 780-422-0014

December 11, 2019

Dr. Randall Croutze
Chief Executive Officer
Alberta Dental Association and College
Suite 402, 7609 109 Street NW
Edmonton, AB
T6G 1C3

Dear Dr. Croutze:

Re: Acceptance Request concerning Section 527 of Alberta's OHS Code
Our File Number: OHS-ACC-000571

Thank you for your request for an acceptance in relation to the Occupational Health and Safety (OHS) Code, dated October 7, 2019. You have requested an acceptance to allow recapping of used dental needles, as an alternative to the prohibition on recapping waste needles specified in Section 527 of Alberta's OHS Code.

The Alberta *OHS Act*, Section 55, allows a Director to issue an acceptance to a work site party if, in the Director's opinion, an alternative approach provides *equal or greater protection* than that provided for by the OHS regulations or OHS Code.

I have completed the review of the application and supporting documents. The alternative approach proposed in the application meets the acceptance criteria described in section 55 of the *OHS Act*. Therefore, I am granting the acceptance subject to the following terms and conditions and general requirements.

Terms and Conditions

- This acceptance applies to dental offices in Alberta with dentists that are regulated by the Alberta Dental Association and College, dental hygienists regulated by the College of Registered Dental Hygienists, and dental assistants regulated by the College of Alberta Dental Assistants.
- The terms and conditions of this acceptance must be included as part of any standard of practice around handling of dental sharps issued by one of the

above three regulatory colleges, where the standard of practice includes recapping dental needles.

- The work procedures in the document “Policy Protocol Sharps, Syringes & Safety Engineered Syringes (SES)” dated May 2018 and supplied by the Alberta Dental Association and College as part of its acceptance application must be followed by all dental and dental hygiene offices wishing to recap needles under this acceptance.
- This acceptance expires on December 11, 2024 or such time as it is rescinded or legislative changes make it invalid or unnecessary.

General Requirements:

- Section 55(5) of the *OHS Act* requires compliance with all terms and conditions of this acceptance.
- All other requirements of the OHS Code must continue to be met.
- This acceptance letter or a copy must be posted at each dental office where recapping will occur, or be otherwise communicated to affected workers, worker representatives (if present), and the joint worksite health and safety committee (if present).
- For the purposes of ensuring the health and safety of workers or the public, this acceptance and supporting documents may be disclosed to other work site parties and/or other regulatory agencies.

Sincerely,



Dr. Xiangning Fan
Director of Medical Services

cc: Ms. Amie Dowell, Registrar & CEO, College of Registered Dental Hygienists
Ms. Jennifer Tewes, Registrar, College of Alberta Dental Assistants