

August 3, 2017

Employer:

I am writing in response to your request for deviation from Section 8 of the First Aid Regulation 2004-130 which states:

**8(1)** *An employer shall ensure that each employee who is designated as a first aid provider is trained to the minimum level as set out in subsection (2) and holds a valid certificate issued by an agency referred to in subsection (3) in respect of that training.*

**8(2)** *The minimum level of training consists of*

*(a) the 10 compulsory modules and any 2 of 5 elective modules of the Workplace Standard First Aid Course as set out in Schedule B, and*

*(b) a minimum of 16 hours of classroom and practical training.*

**8(3)** *The first aid training described in this section may be provided by*

*(a) St. John Ambulance,*

*(b) Canadian Red Cross Society, or*

*(c) any other agency that provides first aid training that meets the requirements of subsection (2) and that is approved by the Chief Compliance Officer.*

**8(4)** *An agency that provides first aid training that meets the requirements of subsection (2) shall issue a certificate in accordance with subsection (5) to a person who satisfactorily completes the training.*

**8(5)** *The certificate shall*

*(a) be entitled "The First Aid Workplace Certificate",*

*(b) be signed and dated by an official of the agency, and*

*(c) state that the course in respect of which the certificate is issued is the Workplace Standard First Aid Course.*

**8(6)** *A certificate issued pursuant to this section is valid for 3 years from the date of issue.*

**8(7)** *An employer shall ensure that a first aid provider has a minimum of 6 hours practice on first aid skills each year during which he or she holds a valid certificate.*

Your primary request is for the Veterinary Clinic as well as for all Animal Hospitals in the Province.

In your request you state the following:

- Each of your doctor's of Veterinary Medicine (DVM's) through their training take emerge training that encompasses first aid plus;
- The majority of your DVM's have completed their training at University of PEI, Atlantic Veterinary College (AVC). You provided a sample of their courses with descriptions of each;
- The Animal Hospital is a 24 hour emerge and Referral Centre. They not only do regular vaccine, spay, neuter medicine, but high level Surgeries including Neuro-Surgery, Spinal Surgery, Orthopedics, and Internal Medicine as well and everything in between;
- The Animal Hospital has advanced medical Equipment they use on a daily basis including endoscopy and a CT scan. Dealing with Pets that 'crash' during surgery as well as Emergencies that come through the door and having to act quickly is part of what they do on daily basis;
- To add to your DVM's, your Registered Veterinary Technicians (RVTs) play as well a vital role in the health care we provide. They are the equivalent of human nurses in human hospitals and more. They are also the anesthesiologist, radiologist technician, pharmacist as well as monitoring critical care patients just to indicate a few of things they do on a daily basis.
- The majority of our RVT's are training through a College,
- You provided the description as well as the outcomes of one of their courses that they are required to take that deals with First Aid plus;
- Your staff are very well trained and your DVM's have worked directly with your local human Emerge response teams on dealing with Pets in Fires and other emerge situations;
- Your Dr's and RVT's are both required to take and pass their licensing tests, pay annual registration fees and each year continue their education through a series of education opportunities to keep their skill sets current with new medicine as well;
- Your goal with Worksafe to clearly demonstrate that in the event of a human emergency they are already equipped to deal with the situation while they call 911 to take over. They fully understand that their goal in the event of a staff member getting cut, bitten or hurt on the job as this is the primary source of first aid items you deal with is to deal with the immediate need and forward the individual to the hospital;
- They would do the same for a customer or a passerby that was in apparent distress including CPR measures;
- They have even over the years gotten used to dealing with fainting humans when they see blood or other medical situations for the first time;
- Another province has moved to let Veterinary Hospitals have a deviation on the First Aid Training requirement and based on the training your staff already have with regards to medicine that it would be good for New Brunswick as well;
- You respectfully request for the Animal Hospital be allowed as well any other DVM's and RVT's in Veterinary Hospitals in the province to be noted as competent and meeting all requirements for WorksafeNB in First Aid Requirements and noted under section 8.3.c of the Worksafe Document based on their Institution of Learning for their degree.

In order to make a decision on your request, additional information will be required. Please provide a copy of the training components from the courses taken by your staff that is comparable to the requirements of Schedule B of the First Aid Regulation. I have attached is a copy of Schedule B of the First Aid Regulation for your reference.

Please do not hesitate to contact me at 506-867-0539 should you have any questions.

Yours truly,

Acting Chief Compliance Officer