

NALOXONE IN THE WORKPLACE CONSULTATION

Introduction

The Ministry of Labour, Training and Skills Development (MLTSD) is interested in receiving feedback and information on the issue of opioid use in the workplace, with a particular focus on facilitating access to naloxone in the workplace in order to reduce the risk of workplace-related deaths caused by opioid overdoses.

Background

Opioids are natural or synthetic substances used to reduce pain in clinical settings. They are also produced and consumed non-medically. Common opioids include oxycodone, hydromorphone and fentanyl. While opioids can be an effective part of pain management for some medically supervised patients, opioid-related harms such as addiction and overdose present a significant challenge in Ontario.

Naloxone is a drug that can temporarily reverse an opioid overdose. Naloxone may also be referred to by brand names such as NARCAN. When someone overdoses on opioids, their breathing either slows or stops completely. If used right away, naloxone can help them breathe normally and regain consciousness. Naloxone can either be injected or given as a nasal spray.

Ontario's Chief Coroner has announced a significant increase in suspected drug-related deaths since the beginning of the COVID-19 pandemic in March 2020, compared to the monthly median reported in 2019. Similar trends have been reported elsewhere in Canada.

It is expected that this increase in drug-related deaths is being driven by a combination of numerous factors, including an increasingly toxic unregulated ("street") drug supply, barriers to access to harm reduction services and treatment, and COVID-19-related restrictions like physical distancing leading to more people using drugs alone.

Understanding the circumstances that contribute to these deaths is urgently needed to inform interventions and policies to prevent opioid-related mortality in the midst of the COVID-19 pandemic.

Discussion Questions

MLTSD is seeking feedback on facilitating access to naloxone in Ontario workplaces in order to reduce the risk of deaths in the workplace caused by opioid overdoses.

MLTSD is particularly interested in receiving feedback on whether or not opioid overdose and overdose management are issues in Ontario workplaces, and if they are

issues, if they require changes to the *Occupational Health and Safety Act* (OHSA) to address the hazard they present in the workplace.

Feedback can be submitted on any or all of the discussion questions asked in this paper.

If there are additional issues, concerns or ideas about workplace opioid use and facilitating access to naloxone that are not addressed in this paper, please take this opportunity to share those thoughts as well.

Opioid Overdoses as a Workplace Hazard

- A. Is the risk of opioid overdoses a concern in your workplace? If so, what is the nature of the hazard, i.e., does your workplace deal with clients or other members of the general public who may be using opioids, or are other parties within the workplace using opioids? Has an opioid overdose occurred in your workplace, and if so, for whom did it occur (e.g., a worker or a patron/client/member of the public)?

Resources and Support for Administering Naloxone in the Workplace

- B. Resources and training programs related to administering naloxone are currently available from many sources in Ontario, such as some municipalities. Are you aware of these resources and, if so, have they been incorporated into your workplace health and safety training? Are the existing resources sufficient or does your workplace require additional resources and support in order to be able to safely and effectively administer naloxone in the event of an opioid overdose?
- C. If your workplace requires assistance, such as guidance material, beyond what is currently available, what additional resources, guidance, and support should MLTSD provide to workplaces in order to promote awareness and prevention of opioid overdoses in the workplace?

Potential OHSA Amendments Related to Naloxone in the Workplace

- D. What are your thoughts regarding requirements for employers to implement an opioid overdose policy and program, should opioid overdoses be a potential risk in your workplace?
- E. What are your thoughts regarding requirements for employers to implement training requirements on how to administer naloxone, should opioid overdoses be a potential risk in your workplace?

- F. What are your thoughts regarding a requirement to provide naloxone in the workplace in the event that an employer becomes aware, or ought reasonably to be aware, that opioid overdoses may occur in the workplace?
- G. In addition to your responses to the above discussion questions, are there any other potential actions from MLTSD that your workplace could benefit from related to addressing hazards posed by the risk of opioid overdoses in the workplace?
- H. Do you think that providing naloxone in workplaces, and ensuring workers have the necessary training to administer it, contributes to the broader public health efforts to reduce opioid overdoses?

Notice to Consultation Participants

Submissions and comments provided to the Ministry of Labour, Training and Skills Development (the Ministry) are part of a public consultation process to solicit views on facilitating access to naloxone in the workplace. This process may involve the Ministry publishing or posting to the internet your submissions, comments, or summaries of them. In addition, the Ministry may also disclose your submissions, comments, or summaries of them, to other parties during and after the consultation period.

Therefore, you should not include the names of other parties (such as the names of employers or other employees) or any other information by which other parties could be identified in your submission.

If you, as an individual, do not want your identity to be made public, you should not include your name or any other information by which you could be identified in the main body of the submission. If you do provide any information which could disclose your identity in the body of the submission, this information may be released with published material or made available to the public.

However, your name and contact information provided outside of the body of the submission (such as that which may be found in a cover letter, on the outside of an envelope, or in the header or signature of an email) will not be disclosed by the Ministry unless required by law. An individual who provides a submission or comments and indicates a professional affiliation with an organization will be considered a representative of that organization and his or her identity in their professional capacity as the organization's representative may be disclosed.

Personal information collected during this consultation is under the authority of s. 70 of the *Occupational Health and Safety Act* and is in compliance with subsection 38(2) of the *Freedom of Information and Protection of Privacy Act*.

If you have any questions regarding the collection of personal information as a result of this consultation, you may contact the Ministry's Freedom of Information

Office, 400 University Avenue, 10th Floor, Toronto, Ontario, M7A 1T7, or by calling 416-326-7786.

Comments Due Date: January 14, 2022

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