



June 30, 2005

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Dear Mr. Vander Doelen:

Thank you for the opportunity to provide comment on the proposed changes to Occupational Exposure Limits for Ontario. We have circulated the proposed changes to our members and they have raised one issue with these proposed changes.

Wood Dust

We understand that along with the changes in wood dust exposure limits, the Ministry is proposing changing the sampling strategy and methodology. Our understanding is that the change in the method doubles the weight of the particulate being collected on the collection medium. As well, there are significant concerns that the proposed sampling method creates more issues re compliance to the revised regulation. The combined effect of the exposure limit changes and the changes in sampling procedure raises serious concerns in the wood industries. Along with the Pulp and Paper sector, manufacturers who use wood or wood products in their processes will be significantly affected.

We support their concerns, and request the Ministry defer implementation of new limits for wood dust and new sampling procedures, pending discussions and further review with those concerned. It is crucial to the confidence in the current OEL revision process that when issues are raised, such as with wood dust, that the Ministry takes the time to work through the issues with those involved to arrive at consensus.

Thank you for this opportunity to comment on this proposal and we look forward to continuing involvement in consultations on this Occupational Exposure Limits initiative.

Yours very truly,

Ian Howcroft
Vice-President
Ontario Division