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Application ID: 58311

Submitted values are:

Bill or item of business: **Bill 88, Working for Workers Act, 2022**

Choose a topic

Do you know the bill title or business (e.g., pre-budget consultations) you'd like to speak or submit material about?

Yes

Choose an application

Which application would you like to submit?

Submit material only

Add your information

Are you submitting material as an individual or on behalf of an organization?

I am submitting material as an individual

Full name

Ms Hong Zhao

Paste submission

I disagree with Bill 88, number 5. I am an acupuncturist. We use herbs and acupuncture needles to treat people. I can't imagine without regulation what would happen. Not safe for us and patients. This is healthcare. Needs to be treated seriously. I am hoping our government can reach out and take away bill 88, number 5.

Would you like to add any other information?

Chinese medicine and acupuncture have been saved people for few thousand years but our object is human. To have regulation is very important.

Comparison of Guidelines and Regulatory Frameworks for Personal Services Establishments

Author: Karen Rideout

Personal services establishments (PSEs) have been identified as a priority area by public health inspectors (PHIs) and provincial ministry staff in several provinces, as well as by people within the industry. There are a lot of gaps and conflicting information regarding public health issues associated with PSEs. Guidelines and regulations are often vague or impractical. In general, there is a lack of training and licensing of both practitioners and business owners within the personal services industry. The level of public health guidance for PSEs varies across jurisdictions within Canada and other countries. While guidelines for more common procedures such as aesthetics, tattooing, and body piercing vary in comprehensiveness, there is a general lack of guidance relating to more extreme forms of body modification. Because the personal services industry is constantly changing, it may be prudent to develop risk assessment procedures for infection prevention and control (IPAC) in these settings, as well as tools to assess risk from failure of IPAC procedures in any personal services setting. As invasive body modification grows in popularity and range of procedures, there is an increasing need to clarify when a procedure falls under the auspices of invasive surgery and whether it should be regulated as such.

What follows is a summary of the regulatory frameworks, as well as highlights and gaps from existing guidelines/regulations, from select jurisdictions within and outside Canada. It is important to note that this is not an exhaustive summary of the guidelines; it highlights some key areas that may be particularly relevant, problematic, or those that vary most between jurisdictions.

Region	Personal Services Included	Regulatory Authority & Guidelines	Enforcement, Training & Licensing	Specifics and Highlights	Gaps & Potential Hazards (Identified by NCCEH)
Canada					
Canada (federal)	- Tattooing - Body piercing - Electrolysis	Health Canada Infection Prevention and Control Practices for Personal Services: Tattooing, Ear/Body Piercing, and Electrolysis Note: Document has been retired.	PSEs are governed by provincial level authority in Canada. Recommendation that staff obtain infection control training via local public health units.	Tattoo & Piercing - Should have clean and dirty zones. - Machines should be foot operated where possible. - Ultrasonic cleaner should have lid. - Avoid touching office equipment; cover with plastic or disinfect after each client; change gloves if equipment touched during procedure. - Records should be kept for minimum 1 year or as per local requirements. - Disinfectants should have DIN. - Detailed instructions provided regarding: - instrument cleaning - environment cleaning - sterilization with different methods. Tattoo - Needles should not be rinsed in ultrasonic between colours because ultrasonic solution is not sterile; use tap	- Removal of needles and reuse of needle bars permitted in tattooing. - Use of solid head ear-piercing guns, which cannot be properly disinfected, is allowed.

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				water instead. • Skin antiseptics should not be sprayed directly onto skin. • Deodorant sticks not recommended for stencilling. Piercing • Disposable cartridge ear-piercing guns strongly recommended; use only for earlobes. • Solid head guns should be cleaned with brush and entire gun soaked in high level disinfectant between clients. • Skin is to be marked with toothpicks and ink; pens should not be used on multiple clients.	
Alberta	• Tattooing • Body and ear piercing • Barbering and hairstyling – defined by <i>Hairstylist Trade Regulation</i> (AR 281/2000) • Esthetics – applying make-up, facials, manicures, pedicures, waxing • Electrolysis	Alberta Regulation 20/2003, Public Health Act, Personal Services Regulation (2003)¹ Health Standards and Guidelines for Tattooing (2002)² Health Standards and Guidelines for Body and Ear Piercing (2002)³ Health Standards and Guidelines for Barbering and Hairstyling (2002)⁴ Health Standards and Guidelines for Esthetics (2002)⁵ Health Standards and Guidelines for Electrolysis (2002)⁶ Regional guidelines and checklists (e.g., Capital Health/Edmonton inspection checklists for tattooing⁷ and piercing⁸). Note: Provincial legislation is almost 10 years old and is expected to change in the near future. A new Departmental Standard Operating Procedure, <i>Personal Service Establishment Inspection Protocol</i>, will begin field testing in July 2010.	Annual inspection by public health inspector of <i>high risk personal service establishments</i>. This is set out in provincial <i>Blue Book (A Common Reference System and Operational Standards for Alberta)</i>; actual practice differs by region. Operators are not required to have specific knowledge of their trade or demonstrate a level of competency. No permit or licence required; studios may open without health approval.	Tattoo • Recommendation for informed consent and minimum age of 18 years. • Deodorant sticks not recommended for stencilling. • Puncture resistant sharps container required; disposal in accordance with regional health authority. Piercing • Piercing guns only for ear lobes; implements must be used only as directed by manufacturer. • Informed consent; no age requirement. • Sterilizers tested every month or 10 cycles. Note: This contradicts the tattooing requirement, which is monthly only. Aesthetics • Lash and brow dye applicators shall be discarded after each client. • Cuticle nippers and callus blades require intermediate disinfection. • All hair tools (e.g., brushes, scissors, combs) shall be cleaned and disinfected after each use. • Cleaning and disinfection of nail files and foot paddles is permitted.	• No specifications for foot bath disinfection. • Thorough cleaning of nail files and foot paddles is not possible. • Legislation is weak. The word <i>should</i> is used when many items require <i>shall</i>. For example, operators <i>should</i> ensure that all critical instruments are sterile. • No legislation requirement for physical, chemical, or biological monitoring of sterilizers. • Use of spray bottles (vs squirt bottles or pumps) for disinfectants presents risk of aerosolization of disinfectant and possibly contaminated debris. • Removal of needles and reuse of needle bars in tattooing is permitted (but uncommon in practice). • Use of non-disposable piercing guns is allowed; these cannot be properly disinfected. • Reusable marking pens permitted for marking skin present risk for cross-contamination. • Recommendation that physicians remove jewellery if infected; evidence is unclear whether this is best practice. • No instruction to cover ultrasonic when in use presents risk for contamination

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					through spray. - Roller wax applicators permitted; roller head must be taken apart, cleaned, and disinfected but no specification to discard wax cartridge. - Makeup may be applied to skin with infections or lesions, if disposable applicators are used or are cleaned with HLD. - Reuse of callus removal blades presents infection risk. - Single-use disposable blades recommended but not required; reusable razor blades shall be cleaned with intermediate disinfection. - No standards for jewellery composition.
British Columbia	- Acrylic nails - Body branding - Body piercing - Colonic irrigation - Electrolysis - Face painting - Flotation tanks - Hair services - Laser therapy - Manicure/pedicure - Mud baths - Sauna - Shaving - Skin care/aesthetics - Spas - Steam baths - Tanning - Tattooing - Therapeutic touch - Waxing - Massage	Health Act – Personal Services Establishments Regulation, BC Reg 202/83 - OC 912/83.⁹ Note: The Regulation pertains to water supply and facilities and prevention of health hazards; it is brief and open to interpretation. Guidelines are available for: PSEs¹⁰ Ear & Body Piercing¹¹ Tattooing¹² Tanning Salon Operators¹³	Education and graduated warning system. Closure of establishment if evidence of health hazard. Annual inspection by environmental health officer. No specific training or licensing required for operators or establishments. - Business licence and approval by health inspector required. - Cosmetology industry was deregulated in 2003. Cosmetology Industry Association of BC (CIABC) planning to offer voluntary training/certification program called BeautySafe¹⁴.	Tattoo - Informed consent required; parental consent recommended for minors. - Deodorant sticks for tattoo stencils should be used with disposable applicator. - Needles, tubes, and bars should be sterilized prior to use; needles should be single use only. Piercing - Informed consent required; parental consent recommended for minors. - Ear-piercing guns that use sealed, disposable stud cartridges highly recommended. - At least 3 pairs of gloves per client/procedure. - Jewellery must be non-allergenic: implant-grade stainless steel (300 series), 14–18 carat gold, niobium, or titanium. - Details provided regarding: - sterile implements - disposable tray covers - autoclaves - illumination to detect blood vessels - surface disinfection	- Difficult to classify some instruments as critical, semi-critical, etc. - Lacking details on <u>how</u> not to <i>double-dip</i> in waxing procedures. - Reusable marking pens permitted for marking skin presents risk for cross-contamination. - Jewellery may be disinfected in alcohol for 5-10 min (not necessarily sterilized). - Rinsing of tattoo needles in ultrasonic between colours presents risk of aerosolization and contamination. - Practicality of disinfection options for different equipment (e.g., equipment compatibility) not considered, especially in aesthetics. - No guidelines for many invasive body modification procedures. - No minimum age for tattooing or piercing procedures. - No risk assessment framework for infection prevention and control (IPAC) in regulations or guidelines.

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				- styptic pencils (not to be used) - hard plastic sharps container for disposal - types of jewellery - skin preparation - ultrasonic & sterilization - eye shields • Recommendation for first-aid training.	
Ontario	• Hairdressing • Tattooing • Body piercing • Manicure/pedicure • Electrolysis • Acupuncture	Ontario Public Health Standards¹⁵ Infection Prevention and Control Best Practices for Personal Services Settings,¹⁶ January 2009 (named under Ontario Public Health Standards, 2008, requirement no. 10) Infection Prevention and Control in Personal Services Settings Protocol,¹⁷ 2008 Note: Provides minimum expectations for service. CIPHI Ontario fact sheets: • Body Piercing¹⁸ • Facials¹⁹ • Foot Spas²⁰ • Hair Salons and Barber Shops²¹ • Manicures, Pedicures and Nails²² • Tattoo and Micropigmentation²³ • Waxing²⁴	Authority by Boards of Health Inspection at least annually and in response to complaint or non-compliance; by MOH or designate.	Tattoo • Detailed tattoo set-up instructions provided. • Needles should be rinsed in tap water between colours, using disposable cups. Piercing • Approved sharps containers required. • Detailed sterilization instructions provided. • Skin antiseptics must be used prior to invasive procedure. • Ear studs from sealed packs only. Aesthetics • Footbaths must be cleaned and disinfected between clients and at end of day. • Quaternary ammonium solutions in hair salons should be next to sink to allow for appropriate rinsing and cleaning. • Scissors and clippers require intermediate to high level disinfection between clients, if skin is nicked or broken. • High-level disinfection should be used for any instrument that accidentally breaks skin. • Detailed instructions provided regarding: - roll-on wax - footbath cleaning.	• Lack of detail on frequency and timing of glove changes. • Reusable skin marking pens permitted; presents risk for cross-contamination. • Gloves may be put on after cleaning clients' skin. • Recommendation to rotate jewellery; evidence is unclear whether this is best practice. • Roll on wax presents a cross-contamination risk. • No standards for jewellery composition.
United States					
California	Barbering and Cosmetology: • Cosmetologists	AB 223 Assembly Bill²⁵ - Amendment to repeal Health and Safety Code Sections 119300-119309. New section <i>Body Art</i>	California Health and Safety Code: • <i>California Conference of Local Health Officers</i> establish	Tattoo & Piercing • Infraction for any person to perform or offer to perform body piercing to a	• Prohibited instrument guidelines (Regulation 993) can be vague. • Inspection rate is less than once per

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	- Manicurists - Estheticians - Electrologists - Barbers - Apprentices and establishments offering these services Tattooing/Permanent makeup Body piercing	(will include significantly more detailed and prescriptive regulations including restrictions on body modification, mandatory immunization for workers, procedures/standards for sanitation/sterilization, and enforcement, etc.). California Health and Safety Code - Section 119300-119309²⁶ California Penal Code: Section 652 and 653²⁷ Health and Safety Regulation (Article 12)²⁸ California Board of Barbering and Cosmetology,²⁹ Department of Consumer Affairs	sterilization, sanitation, and safety standards. - Businesses that provide tattooing, piercing or body modification must register with their respective <i>county health department</i>. - Enforcement: - Failure to register with county health department (if providing these services) - \$500 maximum fine; - Non-compliance with safety standards - \$500 maximum fine per violation. Fine structure for barbering and cosmetology - Progressive fine rates used previously. - Fines were increased (especially for foot spas) with an immediate licence suspension for serious infractions resulting in a requirement for health and safety training, \$500 fine, and increased inspections; this initially caused some panic in the industry. - Unlicensed activity subject to a \$1000 fine. - The establishment <i>and</i> individual licensee are responsible. - Anecdotal evidence indicates that increased fines are working, as it is no longer “worth the risk” to break the rules (K. Flanagan, 2 Nov 09). - Complete list of fines available online. Licensees must have approved training, apprenticeship, or equivalent experience. Establishment owners are responsible, even if there are booth rentals or contractors within the	person under 18 years of age unless piercing is performed in the presence of, or directed under, notarized writing by person's parent or guardian; ear piercing and emancipated minor is exempt (California Penal Code: section 652). - Misdemeanour if person tattoos or offers to tattoo a person under the age of 18 (California Penal Code: section 652). Aesthetics (Barbering and Cosmetology) - Estheticians, etc. are not permitted to break the skin or go past the dead layer; no tool that might break skin is allowed (e.g., metal foot files, callous scrapers, etc.). - Tattooing, piercing, and permanent makeup are not part of cosmetology and can only be done in a licensed cosmetology/barber establishment, if done in a separate room. No invasive procedures. No razor-edged or needle-like tools for callus or blemish removal. - No fish pedicures (fish can't be disinfected). - Detailed instructions for cleaning foot spas (EPA Recommended Cleaning and Disinfection Procedures for Foot Spa Basins in Salons).³⁰ Foot spa regulation was introduced following investigation into mycobacterium outbreak in 2001; a working group was established by Consumer Affairs to make pedicures safer. - Detailed instructions provided regarding: - disinfecting solutions - foot spas - electrolysis - neck strips - dispensing creams	year. Note: 25 inspectors for 38,000 barbering/cosmetology shops.

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			establishment that are operated by other individuals. Owners do not need a licence but there must be a licensed person in charge. Note: There's a possibility of introducing health and safety training for owners.	- pencil cosmetics - tables and headrests - skin peels - prohibited instruments - personal hygiene - building - FDA approved products - infestation - hair disposal • Photos illustrating prohibited instruments³¹ available. • Photos contrasting compliant/non-compliant activities³² available.	
Virginia	• Barbering • Body piercing • Cosmetology • Esthetics • Nails • Tattooing • Waxing	Board for Barbers and Cosmetology,³³ Virginia Department of Professional and Occupational Regulation • Regulations and Statutes³⁴ • Body-Piercing Regulations³⁵ • Esthetics Regulations³⁶ • Hair Braiding Regulations³⁷ • Tattooing Regulations³⁸ • Wax Technician Regulations³⁹	License, training, and certification required for both shop and practitioners of barbering and cosmetology, body piercing, esthetics, hair braiding, tattooing, and waxing. Instructors and schools must be certified and licensed.	• Items with blood or body fluids shall be disposed in accordance with health regulations. Sharps shall be disposed of in puncture resistant containers. • Products banned by the Food and Drug Administration shall not be used. • Single use spatulas shall be used for removing bulk substances. • Alum and solid astringent prohibited; styptic products shall be applied with single use sterile applicator. • Licensees shall not perform services outside scope of practice. • Facilities shall have blood spill cleanup kits. Barbering and Cosmetology/Esthetics • Powder puffs, makeup, sponges, etc. that cannot be sanitized are prohibited from use on multiple clients. • Emory boards are single use only. • Multiuse articles that cannot be cleansed or disinfected are prohibited. • Detailed instructions provided regarding: - electric clippers - brushes, spatulas, electrodes, etc. - wax pots - drill bits Tattooing and Piercing • Minimum age for piercing (except	• Annual self-inspection of salons subject to abuse. • No specific requirements for cleaning foot spas. • Licensing and regulation is comprehensive but does not cover many procedures, e.g., body modification and body piercers cannot practice outside scope of training; unclear whether more extreme procedures are prohibited or simply unregulated; unclear whether body modification industry is <i>underground</i>.

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				earlobe) or tattooing is 18 years or with consent of parent/guardian; signed informed consent kept for 2 years; earlobe piercing permitted on children. - Salon owners shall offer Hepatitis B vaccine to licensees; proof of immunization, immunity status, or signed waiver of offer shall be posted. - Steam sterilizers shall be spore tested monthly and verified by independent laboratory; records kept for 3 years. - Handwashing and new gloves shall follow any interruption in service or breach of glove. - Standard precautions and aseptic technique shall be used at all times. - Razors shall be single use disposable. - Used instruments shall be rinsed in hot water and ultrasonically cleaned or brush scrubbed before sterilization. - Minimum 5 hours of health education including blood-borne disease, sterilization, and aseptic technique required prior to entering tattoo school. - Gloves must be worn during tattoo equipment setup. - Tattoo inks and dyes shall be in single use containers for each client.	
United Kingdom					
UK	- Tattooing - Acupuncture - Ear-piercing - Body piercing - Electrolysis - Micropigmentation - Hairdressing - Esthetics	PHLS Communicable Disease Surveillance Centre / London School of Hygiene and Tropical Medicine (Dr. Norman Noah) Local Government Act 1982, Part VIII Acupuncture, Tattooing, Ear-Piercing, and Electrolysis ⁴⁰ Note: <i>These 1982 guidelines were revised in 2003 (see information below); some of this information is outdated by the revised guidelines, some still current.</i>	All who practice acupuncture, tattooing, cosmetic skin piercing, and hair electrolysis must register with health and local authorities. Body piercers advised to obtain licence from EH Dept at Local Authority. Local Authorities have power to make bylaws (e.g., sanitation, facilities, operators) and regulate registrants.	Tattoo - Reusable stainless needles must be cleaned with ultrasonic, then autoclaved; chromium plate needles are single use only. - Used needles should be disinfected before discarding, with flame, autoclave, boiling, or hypochlorite solution soak for 30 min. - All non-sharp waste (paper towels, tissue, ink capsules) should be sealed in plastic and autoclaved or incinerated. Piercing - All instruments that contact broken skin	- Nose and upper ear-piercing concerns focus on infection, but no recognition of cartilage shatter. - Ear cartilage piercing allowed with piercing guns; not normally recommended due to risk for tissue damage. - Scissor cleaning guidelines vague. - Use of glass bead sterilizers permitted; these are not effective sterilizers. - Gloves not required for tattooing. - Resterilizable tattoo needles permitted. - Use of unpackaged items in bench top steam sterilizers present risk of post-sterilization contamination.

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				should be autoclaved before use. • Body piercing should be performed by experienced practitioner (recommended to have licence from Local Authority) with the use of sterilized/pre-sterilized disposable needles only. Body piercing gun with hollow needle available for nipple piercings. Ear-piercing guns must not be used for other body parts due to short pins that may pinch flesh and lead to restriction of movement, discomfort, and infection. • Fully disposable or disposable cartridge guns only; other guns not recommended. • Aftercare for ear-piercing is simply to keep clean and dry; void antibiotic lotions and disinfectants other than alcohol. • Nose piercing not recommended but if done, piercing guns acceptable but cannot be later used for ear-piercing because of nasal bacteria in mucous membranes; disposable guns preferred but not recommended; risks must be explained to client;. • Ear cartilage piercing allowed with piercing guns. • Piercing of glans and urethra may scar urethra and should only be done by skilled and experienced piercers. • Piercer should do surgical scrub prior to procedure. • Stretching of piercings should be 10% increase fortnightly (every 2 weeks). Aesthetics • Wax should not be filtered and reused. • All hard instruments (tweezers, extractors, scissors, cuticle nipples, nail clippers, etc.) should be sterilized. • Brushes for eyelid, eyebrow, and lip need special cleaning – hot water and detergent wash + 15 min alcohol soak + drying; other brushes need only hot	• Use of pens for marking skin, and skin is not disinfected prior to marking, is a risk for cross-contamination. • Reuse of mascara wands present risk for cross-contamination. • <i>Double-dipping</i> in wax pots permitted unless skin is broken or bleeding; presents infection risk.

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				water and detergent unless skin is broken or infected. Mascara wands that don't enter eye or inner eyelid don't need special care. - Pencils should be sharpened and wiped with alcohol. - Avoid razors on head; avoid electric razors due to sterilization difficulties; use disposable blades and disinfect razor. - Scissors or clippers or crochet hooks that penetrate skin must be autoclaved, use glass bead sterilizer, or boiled/steamed; otherwise, 70% alcohol or chlorhexidine for 15-30 min. - Only alcohol disinfectant and bleach recommended in hair salons, due to chemical hazards. - UV sterilizers not recommended and not considered <i>sterilizers</i>. - Used razors and other sharp items must be disposed in specific sharps disposal box.	
	- Cosmetic piercing - Skin-colouring (micropigmentation, semi-permanent makeup, temporary tattooing)	Local Government Act 2003 (Section 120 and Schedule 6)⁴¹ Tattooing of Minors Act 1969 Female Circumcision Act 1985	Local Government Act 2003: Amendments give powers to local authorities in England (outside London) and Wales, allowing them to require businesses providing tattoo and piercing services to register with the local authorities and observe bylaws. Amendment extends the 1982 laws to include "cosmetic body piercing and semi-permanent skin colouring businesses". Other types of piercing besides ear-piercing were not covered by local authorities in England (outside London) and Wales.	Tattoo - Minimum age of consent for tattoos is 18 years. Piercing - No minimum age for piercing if consent is given. Nipple or genital piercing under age 16 could be sexual offence.	
	- Body piercing - Tattooing - Scarification	HSE – Local Authority Circular Number 76/2⁴²	No standardized training or licensing. Habia (www.habia.org)⁴³ is the standards setting body, but currently no standards exist except for tattooing and body piercing.	Tattoo and Piercing - Gloves should be changed when punctured or contaminated. - Ultrasonic should be used with lid to prevent aerosolization; requires periodic functional testing. - Bleach used for disinfection should state	Use of unpackaged items in bench top steam sterilizers present risk of post-sterilization contamination..

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				chlorine activity on label. - Hot ovens, water boilers, UV light, or glass bead sterilizers must not be used for sterilization. - Standards for sterile packaging (BS EN 868-4:1999), indicators (ISO 11140 part 1), sharps containers (BS 7320 1990). - Needles, tubes, grips, and tips for piercing should be pre-packaged, pre-sterilized, single use. - Operators should be trained in giving aftercare advice. Piercing - Some form of steam sterilization must be on site for piercing premises, even if hospital sterile services are routinely used. - Aftercare advice: no submersion of piercing for 4 days to allow drying of wound; avoid use of skin disinfecting chemicals. - Glossary of common problems following piercing provided. - Glossary of body modification terms provided. - Waste is considered to be clinical waste. - Nickel shall be less than 0.05%; gold should not be less than 14 karat. - Includes piercing inspection checklist.	
	- Nails - Waxing	Habia (government appointed standards setting body for aesthetics): Code of Practice, Nail Services⁴⁴ Code of Practice, Waxing Services⁴⁵ Hygiene in Beauty Therapy⁴⁶ Nail Manufacturers Council and Habia Guidelines for Cleaning and Disinfecting Manicuring and Enhancement Equipment⁴⁷		Aesthetics - Drill bits should be scrubbed and disinfected; sanding boards and sleeves must be single use disposable. - Training is required for operation of electric nail files (Level 3 National Vocational Qualification). - Paraffin and nail oils should not be used in a way that could be contaminated (i.e., with a brush that has touched the skin). - Nail polish brushes are considered self-disinfecting due to nature of product (i.e., does not support fungal, bacterial, or viral growth).	Risk from double-dipping spatula in wax considered small; but pot must be regularly emptied and cleaned. Double- dipping not allowed after application on areas already waxed; disposable single-use pots are recommended ideally.

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				• Never use Ziploc or airtight bags to store customers' used items as they may promote bacterial growth. Containers should be covered and labelled and items inside should be clean. Tools should be disinfected immediately prior to use. Containers stored separate from clean area. • Disinfectants must be prepared fresh daily, even if in spray bottles. • New disposable gloves should be used during waxing. • No jewellery, that could contact client, should be worn. Hair should be tied back. • Client and practitioner must wash hands prior to service; client must cleanse intimate areas prior to waxing. • Patch testing recommended prior to client's first wax; required if client has history of allergy/sensitivity. Cleaning • Scrub brush used to clean files, buffers, paddles. • Ultrasonic cleaning for metal pushers, nippers. • Acetone soak for metal electric file bits. • Washing machine for linens. • Towelettes for electrical equipment and table tops. • Foam buffers should be pressed between towels to removed moisture. Buffer should be dry before storing; spray with 60-90% alcohol with 5 minutes contact time after cleaning. • 70-90% alcohol appropriate for porous or absorbent items. • Cleaning brushes must be cleaned and disinfected between each use.	

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Regulated Health Professions In Ontario

- Audiology and Speech-Language Pathology
- Chiropody and Podiatry
- Chiropractic
- Dental Hygiene
- Dental Technology
- Dentistry
- Denturism
- Dietetics
- Homeopathy
- Kinesiology
- Massage Therapy
- Medical Laboratory Technology
- Medical Radiation Technology
- Medicine
- Midwifery
- Naturopathy
- Nursing
- Occupational Therapy
- Opticianry
- Optometry
- Pharmacy
- Physiotherapy
- Psychology
- Psychotherapy
- Respiratory Therapy
- Traditional Chinese Medicine and Acupuncture

Mar,02.2022

Dear ,Sir/Madam

I'm a resident in Ontario. I heard that the provincial government has a plan to “wind down the College of Traditional Chinese Medicine Practitioners & Acupuncturists of Ontario.”

With regards to the first reading of **the Working for Workers Act, 2022 – Schedule 5 of Bill 88**, the proposed de-regulation of Traditional Chinese Medicine and Acupuncture - I and other residents are reacting to such an irresponsible and ill-conceived proposal with genuine astonishment, utter dismay and complete disappointment.

I am compelled to communicate our vehement opposition to the de-regulation of Ontario's Acupuncture and Traditional Chinese Medicine (TCM) health care industry and bring to your attention this most important matter for your immediate review and reconsideration.

As you know, TCM practitioners and acupuncturists are members of honourable professions that require intensive training of at least 3-4 years. Practitioners must be thoroughly trained and highly skilled to perform acupuncture and to write TCM formulas to avoid potential risks to patients.

Careless acupuncture and wrongful diagnosis can easily lead to pneumothorax, central nervous system damage, peripheral nerve damage, paralysis, allergy, poisoning, internal organ injury, kidney and liver failure, etc. Failure to perform the clean needle technique while inserting needles can also result in serious bacterial and viral infections like HIV, hepatitis and MRSA.

Careful regulation is a must to protect public safety and to maintain public confidence in the fields of acupuncture and TCM, not only in theory, but in practice.

Needless to say, acupuncture and Chinese herbal medicine are extremely effective alternative medicine methods available to the public when they seek to treat a variety and volume of diseases, especially in the areas of pain management, skin disorders, fertility issues, cancer care, post-stroke and post-accident recovery, and auto-immune diseases, just to name a few.

A huge portion of Ontarians have made an educated decision to rely upon acupuncture and Chinese medicine. The quality of Traditional Chinese Medicine Practitioners and Acupuncturists' care must be constantly monitored and ensured. The public needs to choose well-trained, regulated practitioners who have proven their competency through board exams, peer assessments and annual professional development.

Before the establishment of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario (CTCMPAO), there was no standard of practice; no quality assurance policies; no advertising and record keeping guidelines; no board exams to assess practitioners' knowledge, skill and judgment; and no personnel to check practitioners' credentials and educational background.

Prior to the inception of CTCMPAO, the TCM and acupuncture community was a mixture of fake practitioners who called themselves "doctors" without consequence; insurance fraudsters who abused patients' health benefits without any government oversight; under-skilled practitioners who had the potential to damage patients' health and defame the reputation and effectiveness of acupuncture and TCM because they were left unchecked and unaccountable to any government regulatory body.

Skilled acupuncture and TCM practitioners are proud of their credentials and cannot risk having their qualifications and value to the public undermined or made suspect by such extraordinarily unwarranted deregulation that your government has now proposed.

Before the acupuncture and TCM industry was regulated, patients had nowhere to turn to file a complaint or report concerns. Non-regulated practitioners who caused adverse reactions in patients operated freely without discipline. Patients had little to no recourse when problems arose.

Over the past 9 years, the CTCMPAO has worked exceptionally hard to change the once chaotic situation by addressing complaints, listening to honest feedback from patients and practitioners, and by expecting acupuncture and TCM practitioners to be qualified and accountable to uphold its impeccable professional standards.

The hundreds of thousands of people in Ontario who rely upon TCM and acupuncture will be at risk of unscrupulous and even dangerously unregulated practitioners. Most importantly, safe

delivery of acupuncture and TCM treatments could not be assured without the presence of an impartial and robust mechanism for government oversight. Deregulation of TCM practitioners and acupuncturists is a prescription for disaster.

It is also important to point out, that out of the 29 regulated healthcare professions in Ontario, TCM practitioners and acupuncturists are the only ones targeted in this new Act. Why?

Thank you very much for your time and attention! I eagerly await your reply.

Yours sincerely