

May 7, 2021

Delivered by email:
Stephen.Brown@gov.bc.ca

Stephen Brown
Deputy Minister of Health
Ministry of Health
1515 Blanshard Street
Victoria, BC V8W 3C8

Re: Aerosol transmission of COVID-19 and PPE access

Dear Deputy Minister Brown,

As you are likely aware, since the beginning of the COVID-19 public health emergency, the British Columbia Nurses' Union (BCNU) has advocated for the consistent application of the precautionary principle to mitigate the risk of all methods of transmission of COVID-19, including aerosol transmission, and that the highest level of personal protective equipment (PPE) should be available to nurses and other health-care workers until there is definitive proof that such PPE is not required.

Research into the transmission patterns of COVID-19 continues to expand and just this week the BC Centre for Disease Control (BCCDC) stated that COVID-19 may in fact be transmitted by aerosols, despite previous statements that aerosol transmission could only occur during aerosol generating medical procedures (AGMPs).

Unfortunately, the Ministry of Health has been steadfast in adhering to the idea that health-care workers do not require protection from aerosol transmission of COVID-19, except when performing AGMPs, and to date it has limited workers' access to respirators used to protect against aerosol transmission in these circumstances only.

This is unacceptable. Nurses and other health-care workers should have both easy and timely unrestricted access to appropriate PPE. And while employers may determine the minimum level of PPE required, nurses must be allowed to use their clinical judgment to determine if a higher level is required.

There is growing confusion among many BCNU members as a result of your ministry's approach to restricting the use of certain forms of PPE through policies, including the 2020 PPE Framework, and processes like the Point of Care Risk Assessment (PCRA) guidance, which are no longer accurate.

For example, in the April 30, 2021 letter from your office to health authority CEOs, you note that health-care workers can determine if additional measures are required after conducting a PCRA, and that access to additional PPE such as respirators will be provided in circumstances where a health-care worker determines there is elevated risk of COVID-19 transmission.

However, accompanying documents referenced in the PCRA model attached to the email directs a nurse back to the 2020 PPE Framework and "Provincial Mask Use in Healthcare Settings Policy," which only allows for an N95 respirator during an AGMP. This is both a confusing and contradictory message that will create frustration amongst nurses.

We are therefore requesting that all related health ministry policies and guidelines, including the 2020 PPE Framework, be immediately revised to include the elevated risk of aerosol-based transmission.

We also ask that you immediately instruct all health authorities to update their guidance and policies in this regard to ensure that health-care workers always have access to adequate protection against aerosol-based transmission of COVID-19.

It is imperative that the health ministry immediately and completely adopt the precautionary principle in full, and that it mandate the use of the highest levels of respiratory PPE for all health-care workers who may be exposed to the risk of aerosol transmission of COVID-19.

The government is now acknowledging the risk of aerosol transmission outside of the conduct of AGMPs. This acknowledgement requires clear, definitive guidance on the ministry's part. Failure to take these steps will invariably produce further confusion for our members and may lead to unnecessary exposures and illnesses. We therefore request your immediate and complete attention to this matter.

Sincerely,



Christine Sorensen
President,
BC Nurses' Union

Cc:

Adrian Dix
Mark Armitage
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