



Occupational
Hygiene Association
of Ontario

April 26, 2021

Honourable Monte McNaughton, Minister
Ministry of Labour, Training and Skills Development
14th Floor, 400 University Avenue,
Toronto, Ontario M7A 1T7

By Email: Minister.MLTSD@ontario.ca

Dear Sir: RE: Measures to Control Workplace Outbreaks of COVID-19

We are writing to you as the association for professionals in this province that work to prevent occupational diseases across all sectors of the economy. Our members are well educated, and in positions to develop controls that reduce risk of many hazards, including biological exposures. We know that you, like all of us, are highly concerned about the third wave of this pandemic and frequent news reports that many of those with COVID-19 in hospital ICU's are from essential workplaces. This latest wave has occurred in spite of the increased enforcements and inspections by your Ministry, and advice to employers on how to develop and implement an infection control program. We are therefore encouraging you to ask your Ministry to do more to reduce risk of spread of the new variants of concern that appear to be overwhelming previously prescribed control measures in many workplaces. Outbreaks in workplaces due to more infectious variants, like the B.117, warrant increased control measures in many essential workplaces to keep our workers and their families as safe as possible, despite the need to keep these essential workplaces open as much as feasible.

According to the Journal of the American Medical Association (online, April 16, 2021), "*evidence confirms that far-field airborne transmission (defined as within-room but beyond 6 feet) of SARS-CoV-2 is occurring*". We also have reviews of scientific evidence (e.g. The Lancet, online, April 15, 2021) that propose, "*There is consistent, strong evidence that SARS-CoV-2 spreads by airborne transmission. Although other routes can contribute, we believe that the airborne route is likely to be dominant.*" We therefore encourage you to update the MLTSD's response to the pandemic precautions, due to the changing risks that essential workers now face.

Such actions could include:

- Updating MLTSD advice on precautions that should be considered when implementing the hierarchy of controls. Two metres distance with source masking may not be sufficient if ventilation is poor or unknown indoors. Requiring employers to at least investigate improved ventilation controls and implement such measures, are consistent with the hierarchy of controls. Such measures have been proposed and recently updated by the standard setting

organization¹ that we rely upon for HVAC design, operation and maintenance in our provincial Building Code.

- Co-ordinating with the Ministry of Health (or private vendors) to implement more on-site rapid testing in workplaces identified by inspectors as high risk due to poor or unknown ventilation, and lack of respiratory protection.
- Encourage enhanced Personal Protective Equipment, where necessary and feasible, if other control measures, like HVAC, have not or cannot be enhanced sufficiently. The shortages of respirators, like N95 disposal filtering facepiece respirators, are far less than a year ago. We know that N95's are now produced in Canada. Commercial vendors advertise name brand N95's and similar KN95's for sale to non-healthcare employers. Public Health officials in Toronto post that our local hospitals have more than one year of supply² for these vital safety products. Employers must take reasonable precautions that include enhanced respiratory protection (not just source control masking) if other means are not feasible to reduce risk of airborne transmission.
- Issue "Stop Work" orders in workplaces that have demonstrated that they are not taking all reasonable precautions, as demonstrated by workplace outbreaks. We encourage you to instruct your inspectors to use the powers they already have under the OH&S Act to follow the lead of Medical Officers of Health in Peel and Toronto to shutdown any non-critical workplaces when they experience an outbreak that spreads within their workplace. This will enlighten others to improve their COVID-19 plans and show workers that the government "has their back", as re-iterated by the Premier in his news conference on April 22.

Our organization and its members are hopeful that the MLTSD will lead the way and update measures now needed to help with the current crisis. We offer you encouragement and our advice, if requested to explain our recommendations. However, we are confident that your Ministry and other Partners in Prevention already employ many of our members who are ready to help us overcome the new challenges that this third wave of the pandemic presents.

Yours Sincerely,

Anne-Marie Landis-Groom MHS, CIH, ROH
OHAO President, on behalf of OHAO Board of Directors

¹ ASHRAE, see <https://www.ashrae.org/technical-resources/building-readiness#epidemic>

² <https://www.toronto.ca/home/covid-19/covid-19-latest-city-of-toronto-news/covid-19-status-of-cases-in-toronto/> Accessed April 21, 2021.