

Response to the Macdonald Campus Asbestos Investigation Report

Provost's Task Force on the Response to the Macdonald Campus Asbestos
Investigation Report

Progress Report - Nov. 27, 2023

1.1 Action Status for FMAS, PMO and EOC action plans as of 27 November 2023

| Task Force Response (Sep18) | Reference & Title | Description of Recommendation (color corresponds to short, medium or long term action plans) | Progress as at Nov. 27 2023 |
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| <p>FMAS-01 and FMAS-02 linked: 1 - The Task Force will work with Facilities Management and Ancillary Services (FMAS) and Environmental Health and Safety (EHS) to establish clear reporting, communication and escalation processes. 2 - These processes will be documented and posted on the EHS website. 3 - Expanded EHS training and awareness campaigns will ensure that all members of the community are aware of any processes that impact them.</p> | <p>IA.02/FMAS-02 Asbestos Incident Response Protocol (S)</p> | <p>Given that the treatment of the dust concerns differed from the expected protocol, the asbestos incident response protocol should be reviewed to improve coordination between parties, address how triage can be better performed, improve response times, and increase awareness of the asbestos incident response protocol by responsible parties in all cases, but in particular where shared spaces and construction projects are involved.</p> | <p>NEEDS ATTENTION</p> <p>The working group has been working on deliverables since September. Proposed deliverables will be drafted for review.</p> |
| <p>PMO-05, PMO-06, PMO-07 linked: 1 - The Task Force will work with PMO to draft principles to be followed in future projects to minimize risk conditions related to project design and development. 2 - The principles will be validated with senior administration to ensure that: there is alignment with the academic mission of the university, and senior academic leaders can support decisions that are dictated by safety principles, despite the potential negative impacts on academic activities.</p> | <p>IA.08/PMO-05 Construction site logistics (M)</p> | <p>McGill must always prioritize, and to the extent possible, construction site logistics that favor segregating construction activities from user activities, including the means and methods designed for the delivery and handling of construction materials, and for the disposal of construction waste to and from points of service, in place of overlapping with occupied spaces, to minimize the risk of contamination.</p> | <p>NEEDS ATTENTION</p> <p>Action plan on principles needs to be developed.</p> |
| <p>PMO-05, PMO-06, PMO-07 linked</p> | <p>IA.09/PMO-06 Shared spaces (M)</p> | <p>Entry into construction areas should be limited or prohibited, where warranted, to those who are not involved in the project process or construction activities. When projects require shared spaces, safety measures</p> | <p>ON TRACK</p> <p>Deliverables on track for development of process in</p> |

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| | | <p>must be implemented. These can include clearly defined boundaries to separate construction site from user-occupied areas and restricting access to authorized personnel. To prevent exposure to hazardous materials, it is important to seal off and segregate construction site from all non-construction operations. In high-risk projects that include shared spaces, heightened monitoring controls should be implemented to ensure proper user safety. Project planning must realistically address these challenges and constraints at the earliest stage possible while monitoring the projects' risks and complexity. Such planning is necessary to avoid last minute decisions/solutions involving many stakeholders.</p> | <p>case shared spaces are required.</p> |
| <p>PMO-05, PMO-06, PMO-07 linked</p> | <p>IA.10/PMO-07 Anticipated delivery (M)</p> | <p>The PM, in coordination with project professionals and GC, must ensure that the anticipated delivery procedure and relevant documentation is officially completed before the faculty users are allowed to occupy a room, as well as notifying construction workers not to use these spaces. This will ensure clear boundaries as well as clear responsibility in terms of the maintenance and cleaning of the delivered room, hence minimizing the risks of contamination and dust accumulation.</p> | <p>ON TRACK On track for development of new process for anticipated delivery.</p> |
| <p>PMO-11, PMO-12 linked: 1- The Task Force will work with PMO, Risk Advisory and Insurance Services and Legal Services to review current risk assessment frameworks, benchmark with peer universities and organizations, and propose potential changes in the way we approach risk and contingencies.</p> | <p>IA.14/PMO-11 Formalizing the project risk management process (L)</p> | <p>Management should formalize and strengthen the project risk management process, including defining criteria to prioritize projects requiring a more robust approach when dangerous materials such as asbestos are involved. The process must include the risk assessment, identification and formalization of key risk mitigation plans, risk monitoring, and updating the risk assessment throughout the project, as well as the establishment of a risk contingency that is managed throughout the delivery of the project.</p> | <p>ON TRACK New procedure developed, to be reviewed and agreed to.</p> |

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| <p>PMO-11, PMO-12 linked.</p> | <p>IA.15/PMO-12 Risk contingency additional to the 10% construction contingency (L)</p> | <p>Projects encompass different types of contingencies that may need to be accessed during different phases of the project, such as for design and construction phases. During the management of the execution of the project, these alternative types of contingencies should be considered, particularly when there is a substantial presence of dangerous or hazardous substances (such as asbestos). Therefore, Management should review the project contingency allocation and implement a risk management process that establishes a risk contingency allocation that will track the evolution of pertinent risks as appropriate on a project-by-project basis.</p> | <p>ON TRACK</p> <p>Discussions ongoing with Finance and Infrastructure Committee of the Board regarding the (re) introduction of risk contingency allocations.</p> |
| <p>1 - The Task Force will examine EHS's authority and mandate to strengthen its role and authority. 2 - The Task Force will recommend structures to be put in place to ensure that non-compliance with EHS directives has consequences, such as impact on performance evaluations or disciplinary measures. 3- The Task Force will work closely with EHS, its parent unit Campus Public Safety, as well as the Vice-Principal (Administration and Finance) and the Secretariat to ensure proper governance mechanisms are put in place and enforced.</p> | <p>IA.17/EHS-01 Proper authority and establishing clear accountability measures (M)</p> | <p>Senior administration and management must review EHS's mandate vis-à-vis other McGill stakeholders involved with asbestos management to clearly define and formalize the necessary authority to the responsible units and personnel. The clear lines of authority will enable the responsible units to ensure consistency in the implementation of process controls across the institution. The review of EHS's mandate must include what role they must have in construction projects. – Management must establish clear accountability measures for McGill stakeholders to ensure that everyone is aware of their responsibilities and the consequences of non-compliance to policies and procedures. This can be achieved through the development of performance metrics and other monitoring tools. McGill stakeholders involved with asbestos management to clearly define and formalize the necessary authority to the responsible units and personnel. The clear lines of authority will enable the responsible units to ensure consistency in the implementation of process controls across the</p> | <p>ON TRACK</p> <p>Specific working group convened. See section 1.2 below for details.</p> |

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| | | institution. The review of EHS’s mandate must include what role they must have in construction projects. | |
| EHS-02, EHS-03, EHS-04 linked: 1 - The Task Force will work with EHS to ensure that policy and practices are aligned, and that all members of the community are aware of the updated policy. 2- The Task Force will work with EHS to develop a full compliance plan to ensure that compliance with the policy is monitored and tracked, reported on and that any infractions are followed up on appropriately. This may lead to the need for additional resources in EHS (see the recommendation below). 3 - The Task Force will work closely with EHS, Campus Public Safety and the VP (Administration & Finance) to ensure that EHS staffing is sufficient to carry out its (potentially expanded) mission and mandate. | IA.18/EHS-02 Review and approval of the Asbestos Policy (L) | Management must ensure that operational, senior administration, and governance stakeholders review the current asbestos policy and submit it for approval in a timely manner to the appropriate governance instance within the University’s institutional policy framework to provide the authority required to achieve its mandate. | ON TRACK Specific working group convened. See section 1.2 below for details. |
| EHS-02, EHS-03, EHS-04 linked | IA.19/EHS-03 Comprehensive compliance monitoring plan (M) | Management must develop a comprehensive plan for monitoring compliance with established asbestos management process controls. The plan must include regular institutional policies and procedures reviews, as well as ongoing communication and training to ensure that all stakeholders (PMO and EHS) are aware of, and fulfill, their responsibilities. | NEEDS ATTENTION Discussion to take place (on track otherwise) |
| EHS-02, EHS-03, EHS-04 linked | IA.20/EHS-04 EHS capacity and backup for key roles (M) | Considering that EHS services must be seen as essential, management must review EHS’s staff capacity and availability at the Macdonald Campus to respond to the needs when time-sensitive requests are received. In a broader sense, the capacity must be aligned with their reviewed mandate (refer to Process Improvement EHS-01). Management should consider additional backup options to fill potential gaps and support key roles | NEEDS ATTENTION Will need follow up – appropriate staffing depends heavily on mandate. |

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| | | and/or critical tasks, such as contracting with external firms for additional support where the availability of internal staff is unable to provide a timely response within the protocol. Specifically relating to the Macdonald Campus, management should consider appointing a dedicated EHS resource to address all occupational health and safety matters arising at the campus. | |
| EHS-05, EHS-06 linked: 1 - The Task Force will work with EHS and communications units within FMAS and centrally to create yearly plans for training and awareness. The plans will be designed to address the main roles and situations of members of the community. | IA.21/EHS-05 Awareness (L) | Management should review the current coordination and communications tools to ensure that awareness campaigns to stakeholders, particularly construction workers and students, achieve their intended outcomes. | <p>ON TRACK</p> <p>On Track</p> |
| EHS-05, EHS-06 linked | IA.22/EHS-06 Enhancing health and safety culture (L) | The University has a strong governance and operational foundation from which to further promote health and safety. Improving the culture of health and safety in the University setting requires a comprehensive and multi-faceted approach that involves all stakeholders. The following are some means the University should adopt to promote health and safety culture: - (1) Demonstrate a visible and consistent commitment to health and safety; - (2) Establish and communicate clear comprehensive principles and guidance (i.e. policies, programs, operating procedures) specific to the wide range of areas present at the University; - (3) Ensure adequate resources are available to provide awareness and training and safety programs for all members of the University community, including students, faculty and staff, as well as contractors; - (4) Foster effective communication channels to promote health and safety information, updates and awareness campaigns; - (5) Encourage reporting and investigations; - (6) Engage stakeholders in health and safety initiatives; - (7) | <p>ON TRACK</p> <p>On track. EHS-06 being part of the working group's focus. See section 1.2 below for working group details.</p> |

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| | | Regularly review operations to promote continuous improvement. | |
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1.2 EHS Mini Work Group

As a response to recommendation EHS-01, EHS-02, EHS-06, a collaborative agreement- i.e., EHS, FMAS, Task Force- took place to create a mini work group under the name EHS Mandate Review Working Group. Its mandate is to propose revisions of EHS Policies and mandate, to address all the issues that were raised by the Internal audit and reflected in its recommendations.

EHS Mandate Review Working Group members

TF representative

Director of EHS

Senior director CPS

Associate Vice-Principal FMAS

VPAF representative

TF Special project manager

FMAS Liaison

1.3 List of acronyms

CPS Campus Public Safety

EHS Environmental Health and Safety

OEM Office of Emergency Management

EOC Emergency Operation Center

FMAS Facilities Management and Ancillary Services

IC Incident Command

PG Policy Group

PMO Project Management Office

SOP Standard Operating Procedure

TF Task Force

UHSC University Health and Safety Committee

VPAF Vice-Principal (Administration and Finance)