

Response to the Macdonald Campus Asbestos Investigation Report

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

Progress Report - Oct. 27, 2023

1 Deliberations & meetings

The Task Force will periodically report on progress to the Provost and Vice Principal (Academic). The following points describe the actions that took place to define an organizational chart with responsible individuals assigned to respond/report on the progress of work:

- A Special Project Manager was hired during the reporting period to help manage and coordinate the work of the Task Force, and to work with a key contact in FMAS in facilitating the response to the recommendations.
- FMAS has appointed a liaison to play the Key role, working together with the Task Force's Special Project Manager to coordinate the response from the FMAS perspective.
- Both individuals have been meeting jointly with representatives from different units with responsibility for implementation of recommendations, to discuss and report the response of the assigned recommendations.
- During the reporting period, work was mainly focused on recommendations assigned to FMAS, PMO and EOC. Reporting on progress for recommendations assigned to EHS and FAES will occur in the next reporting period.
- The Task Force met with newly appointed Macdonald Campus Liaison, Professor Petra Rohrbach, to discuss the status of the Action plan.

2 Actions

Following the internal Audit (IA) report, 26 action plans were defined, involving improvement in awareness, asbestos policy, enhancing Health and Safety, construction protocols. The Task Force saw the interrelation between different recommendations assigned to each unit. Therefore, recommendations were grouped under themes in order to consider them in a broader context that would speak to the administration of the recommendation within the current context within units. Furthermore, under each theme the recommendations are placed in the order that corresponds to the logic sequence of the process chain, making them more straightforward to implement. The themes are outlined below.

2.1 Grouped recommendation by Unit

2.1.1 PMO

Category	Recommendation	Term
Placing a general org. to all projects overseen	1.PMO-11: formalizing the project risk management process	Long
	2.PMO-12: risk contingency additional to the 10% construction contingency	Long
	3.PMO-10: monitoring of the projects & PM's	Short
	4.PMO-09: formally review PM's capacity to deliver on mandate when important changes in scope	Short
	5.PMO-13: additional supervision by industrial hygiene consultants & clarification of their mandate	Long
Organization of construction logistics	1.PMO-05: construction site logistics	Medium
	2.PMO-06: shared spaces	Medium
	3.PMO-07: Anticipated delivery	Medium
Placing Safety Strategy	1.PMO-02: communication of CNESST reports	Short

	2.PMO-04: air circulation & ventilation systems	Short
	3.PMO-08: rigorous project monitoring	Short
	4. PMO-03: Safety officer	Short
	5.PMO-01: enforcing health & safety controls on the construction site	Medium

2.1.2 EHS

Category	Recommendation	Term
Engagement with the community & Awareness	1.EHS-05: awareness	Long
	2.EHS-02: review & approval of the asbestos policy	Long
	3.EHS-06: enhancing Health & Safety culture	Long
Internal Organization	1.EHS-01: proper authority and establishing clear accountability measures	Medium
	2.EHS-03: comprehensive compliance monitoring plan	Medium
	3.EHS-04: EHS capacity & backup for key roles	Medium

2.1.3 EOC

Category	Recommendation	Term
Community engagement	1.EOC-03: communication	Short
Internal Organization	1.EOC-02: policy group	Medium
	2.EOC-01: roles & responsibilities	Medium

2.1.4 FMAS

Category	Recommendation	Term
Incidents	1.FMAS-02: asbestos incident response protocol	Short
Internal Organization	1.FMAS-01: integration of the communication Silos	Medium
	New Recommendation #26 assigned to CPD Under FMAS	
Response to Incident	IA 26- CPD-01: Feasibility of installing modular Labs on campus in response to current need and to provide swing space for upcoming renovations	Short

2.1.5 AES

Category	Recommendation	Term
Protocol	1.AES-01: moving of specialized equipment	Short

2.2 Action Status for FMAS, PMO and EOC action plans as of 27 October 2023

Task Force Response (Sep18)	Reference & Title	Description of Recommendation (color coding corresponds to short, medium or long term action plans)	Progress as at 27 October 2023
<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.01/FMAS-01 Integration of the communication silos (S)</p>	<p>Communication processes between all stakeholders should be reviewed and improved when relating to construction projects involving hazardous substances (such as asbestos). The role and responsibility of each stakeholder, including FMAS Units (internal PM, PMO, EHS, Building Operations), the PM and users in these situations should be formally established and shared with parties at the beginning of each project phase, to facilitate an effective communication and escalation process.</p>	<p>ON TRACK</p> <p>FMAS Collaboration strategy is under development to counter silos; Incident Management Team being formalized for escalation.</p>
<p>PMO-01, PMO-02, PMO-03 linked: 1 - The Task Force will review, with PMO, Procurement Services and Legal Services, how to strengthen contractual obligations of General Contractors (including an obligation to share any CNESST reports with McGill). 2- The Task Force will also work with PMO to review standard operating procedures Project Managers use to oversee General Contractors, to ensure that contractual obligations are fulfilled throughout the project.</p>	<p>IA.04/PMO-01 Enforcing health and safety controls on the construction site (M)</p>	<p>The PMO must ensure that further adequate oversight controls are in place to emphasize that the primary responsibility for compliance with the obligations relating to a construction site rests with the GC. Despite the constraints encountered and the complexity of the context, it is imperative that the GC ensures appropriate health and safety mechanisms are maintained. These must be in accordance with the contractual documentation and the Safety Code for the Construction Industry, both of which include many clauses dictating obligations regarding dust control and regular cleaning of construction sites, as well as adequate protection of the surrounding equipment and furniture from construction dust/ debris.</p>	<p>ON TRACK</p> <p>Additional SST position defined in PMO for safety oversight.</p>
<p>PMO-01, PMO-02, PMO-03 linked</p>	<p>IA.05/PMO-02 Communication of CNESST reports (S)</p>	<p>In coordination with McGill Legal Services, Management should implement a control process such that CNESST inspection reports be promptly communicated to McGill to enable the PM and PMO to proactively address significant concerns raised by CNESST. This proactive approach will facilitate timely corrective actions and ensure the adherence to necessary safety measures throughout the project lifecycle. If infractions are not addressed in a timely</p>	<p>ON TRACK</p> <p>Standard contractual terms have been adapted to require GCs to send any CNESST reports to the University.</p>

		manner, the PM must escalate the issue and notify the PMO for further actions where warranted.	
PMO-01, PMO-02, PMO-03 linked	IA.06/PMO-03 Safety Officer (S)	The PMO must ensure that the GC complies with regulatory compliance requirements to hire a safety officer for the construction site in order to reduce risks, such as increased accidents, insurance costs, legal liability and work closures as well as reputational risk.	REQUIRES ATTENTION Site Construction Minutes template being updated to ensure tracking of safety issues; Need to put in place a mechanism to check presence of qualified safety officer.
PMO-04, PMO-08, PMO-09, PMO-10 linked: 1 - The Task Force will work with PMO to understand issues related to increased and potentially excessive workload of internal and external project managers, the reality of the recruitment market in the field of project management, and the demands placed on PMO stemming from the current slate of projects. 2 - The university will ensure that the capacity to manage projects that is available within PMO (through internal and external PMs) matches the demands in terms of construction projects.	IA.07/PMO-04 Air circulation and ventilation system (S)	It is acknowledged that the management of air flows and ventilation systems is inherent to all construction projects and is one process control amongst many when managing asbestos work conditions. In environments with the presence of asbestos, and when adjacent to occupied spaces with users, additional air monitoring measures should be implemented to ensure continuous adequate air pressure within the construction site and the surrounding occupied areas. This will maintain optimal air conditions and prevent the dispersion of asbestos fibers beyond the designated construction site, hence minimizing the risk of asbestos contamination.	ON TRACK General Conditions for all projects are being amended to ensure negative pressure for all projects, not just the ones with high-risk asbestos conditions.
PMO-04, PMO-08, PMO-09, PMO-10 linked	IA.11/PMO-08 Rigorous project monitoring (S)	It is in the PM's mandate to represent McGill, to act in its best interests and thus to ensure that the project is professionally managed, on behalf of McGill, according to the best industry practices and McGill's framework and requirements. One of the PM's important tasks is to ensure quality control on all activities from all parties and stakeholders in the construction process so that McGill's General and Complementary Conditions and the Professionals' specifications be respected and applied on the construction site by the GC. Based on various sources of information, it appears that tighter project management on the construction site could have prevented certain situations from occurring. Project Managers (internal or external to McGill) should reinforce their vigilance and make sure that the General Contractor always follows contractual General and	ON TRACK A new process for periodic written reporting by PMs about General Conditions is being developed

		Complementary Conditions and professional specifications applicable to the construction site and the project's context.	
PMO-04, PMO-08, PMO-09, PMO-10 linked	IA.12/PMO-09 Formally review PM's capacity to deliver on mandate when important changes in scope (S)	The scale and number of projects under the PM's oversight increased very significantly without evidence of a PMO review of the PM's capacity to deliver the mandate. Due to the large size and complexity of the Macdonald Campus DM Projects, along with the addition of eight new projects that were not originally listed, it would have been beneficial for the PMO to define a specific plan to review and consider mechanisms for updating and identifying the necessary resources and actions needed to accommodate the increased workload. This would have resulted in a well-documented revision of the project planning.	REQUIRES ATTENTION Mechanisms for PM workload review need to be reinforced
PMO-04, PMO-08, PMO-09, PMO-10 linked	IA.13/PMO-10 Monitoring of the projects and PMs (S)	As the leader and director of construction and renovation projects on McGill properties and facilities, the PMO is responsible for the tendering, selection, and awarding of contracts to consultants and contractors. However, due to limited delivery capacity, PMO had outsourced the project management role to a professional external firm. To ensure the PM's performance is monitored effectively, PMO uses various management tools and activities. For important and riskier projects, PMO should adopt a tighter approach on external PM oversight. It should require comprehensive periodic (i.e. monthly) reports prepared by the external PM to provide more detailed project progress assessments. For the scale of the projects currently reviewed, although occasional remarks about the projects were recorded in the 'Needs and Efforts Status' updates, a more comprehensive monthly report covering key aspects of project management should have been considered. While weekly meetings were held with the PMO during certain periods, these meetings covered multiple projects. We believe that fully documented monthly reports should be produced to effectively support project monitoring.	REQUIRES ATTENTION PMO to validate new mechanism for reporting of PM monitoring, in time for prevention issues to be addressed, for all types of projects.
1 - The Task Force will mainly work with PMO and EHS to review the mandates of the industrial hygiene	IA.16/PMO-13 Additional Supervision by industrial	The industrial hygiene consultants' site supervision must reflect and correspond to the project's context and risk conditions when	ON TRACK

consultants in all our projects and expand mandate where necessary compatible with the risk level of each project.	hygiene consultants and clarification of their mandate (L)	related to the management of asbestos. Consequently, Management must revise the contracts of industrial hygiene consultants to ensure that site supervision during construction activities provides adequate coverage of the full scope of work, including asbestos work in moderate- and low-risk conditions when needed.	New standard mandate template is under development
EOC-01, EOC-02, EOC-03 linked: The Task Force will work with the Office of Emergency Management to ensure that: 1 - Roles and responsibilities for EOC members are clear and known. 2 - Criteria to activate groups involved in the University's emergency response are revised. 3 - Principles and guidelines are in place to ensure the effectiveness of EOC communications.	IA.23/EOC-01 Roles and responsibilities (M)	To allow for increased success in emergency responses, EOC leadership should clarify the reporting lines and the roles and responsibilities of each responder, including subject matter experts, and set clear expectations at the beginning of the EOC activation. In addition, new EOC responders, especially subject matter experts, should be brought up to speed on the role of the EOC so that all responders are aligned and work towards the same objectives and priorities.	<p>ON TRACK</p> <p>Training and quick refreshers being developed for all EOC members</p>
EOC-01, EOC-02, EOC-03 linked	IA.24/EOC-02 Policy Group (M)	Management should review under which criteria the PG should be activated to ensure the EOC is provided with appropriate consistent high-level strategic support and direction to manage an emergency.	<p>ON TRACK</p> <p>Review of activation criteria under way with VPAF; annual review of role with Policy Group being scheduled.</p>
EOC-01, EOC-02, EOC-03 linked	IA.25/EOC-03 Communication (S)	The EOC should review its overall emergency communication approach by reviewing the frequency of communication and method of communication delivery (online written communications and in-person/virtual meetings) to provide ongoing and optimal reassurance and prevent the impacted community from feeling isolated during the emergency period, in collaboration with local leadership of the impacted community. EOC leadership should brief all responders on the basics of emergency communication to ensure accurate and complete information is gathered on a timely basis which will in turn facilitate an efficient and effective ongoing communication process with the impacted community and mitigate the existing feeling of disconnection between the Macdonald Campus and the downtown campus. In addition, the EOC should consider using the	<p>ON TRACK</p> <p>Review of Emergency Notification Protocol being finalized; review of emergency communications protocols underway.</p>

		emergency notification system, where warranted, by sending emergency alert messages on cell phones so that the impacted community is instantly notified of the emergency updates, especially for the initial communication. Furthermore, the EOC should review the type of information being communicated and provide any reports or other supporting documents deemed to be of importance to the impacted community on a timely basis, to ensure continuous transparency of information.	
(New recommendation)	IA.26/CPD-1 Temporary lab space at Macdonald campus	Assess the feasibility of installing modular labs on the campus to relieve the current unsustainable need to have researchers sharing active research spaces and to provide swing spaces for upcoming renovations in other buildings on campus. (Added by Provost on September 22, 2023)	ON TRACK Work in progress with Campus Planning and Design

2.3 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