

Response to the Macdonald Campus Asbestos Investigation Report

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

Progress Report - July 25, 2024

1.1 Action Status for FMAS, PMO and EOC action plans as of 25 July 2024

Task Force Response (Sep18)	Reference & Title	Description of Recommendation (color corresponds to short, medium or long term action plans)	Progress as at JULY 25 2024
FMAS-01 and FMAS-02 linked	IA.02/FMAS-02 Asbestos Incident Response Protocol (S)	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.	COMPLETE
The Task Force will work with Deans, the Project Management Office (PMO), and the University Health and Safety Committee (UHSC) to ensure: 1- safety protocols are discussed with building occupants when a construction project starts. 2- Principal Investigators receive initial training on safety protocols that is regularly updated and. 3- a university-wide awareness campaign is launched, that includes education on the University’s existing framework for responsibility in terms of safety (the Internal Responsibility System). 4- Academic and administrative supervisors should be empowered to enforce disciplinary measures in the case of blatant disregard for safety protocols.	IA.03/AES-01 Moving of specialized equipment (S)	Prior to moving any specialized equipment from construction areas that may involve materials likely to contain asbestos (MLCA), the Faculty Safety Chairs should ensure that a process is implemented such that the Faculty members are made aware of the internal procedures relating to decommissioning and decontamination so that the latter, through an appropriate role, such as the Building Director or Renovations Logistics Specialist, can coordinate with EHS accordingly.	COMPLETE

PMO-01, PMO-02, PMO-03 linked	IA.05/PMO-02 Communication of CNESST reports (S)	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 manner, the PM must escalate the issue and notify the PMO for further actions where warranted.	COMPLETE
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.	COMPLETE
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.	COMPLETE
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	COMPLETE

		<p>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.</p> <p>Project Managers (internal or external to McGill) should reinforce their vigilance and make sure that the General Contractor always follows contractual General and Complementary Conditions and professional specifications applicable to the construction site and the project's context.</p>	
PMO-04, PMO-08, PMO-09, PMO-10 linked	<p>IA.12/PMO-09 Formally review PM's capacity to deliver on mandate when important changes in scope (S)</p>	<p>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.</p>	COMPLETE
PMO-04, PMO-08, PMO-09, PMO-10 linked	<p>IA.13/PMO-10 Monitoring of the projects and PMs (S)</p>	<p>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</p>	COMPLETE

		<p>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.</p>	
EOC-01, EOC-02, EOC-03 linked	<p>IA.25/EOC-03 Communication (S)</p>	<p>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</p>	<p>COMPLETE</p>

		using the 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 (S)	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)	COMPLETE
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.	IA.01/FMAS-01 Integration of the communication silos (M)	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.	COMPLETE
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	IA.04/PMO-01 Enforcing health and safety controls on the construction site (M)	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	COMPLETE

<p>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>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>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>COMPLETE</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 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</p>	<p>COMPLETE</p>

		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.	
PMO-05, PMO-06, PMO-07 linked	IA.10/PMO-07 Anticipated delivery (M)	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.	COMPLETE
<p>1 - The Task Force will examine EHS's authority and mandate to strengthen its role and authority.</p> <p>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.</p> <p>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>	IA.17/EHS-01 Proper authority and establishing clear accountability measures (M)	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	<p>IN PROGRESS</p> <p>Sent to Legal Services on July 24.</p>

		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.	
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.	ON TRACK Specific working group convened. Work in progress
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 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.	COMPLETE
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	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	COMPLETE

<p>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.</p>		<p>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>	
<p>EOC-01, EOC-02, EOC-03 linked</p>	<p>IA.24/EOC-02 Policy Group (M)</p>	<p>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>	<p>COMPLETE</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>COMPLETE</p>
<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>COMPLETE</p>

<p>1 - The Task Force will mainly work with PMO and EHS to review the mandates of the industrial hygiene consultants in all our projects and expand mandate where necessary compatible with the risk level of each project.</p>	<p>IA.16/PMO-13 Additional Supervision by industrial hygiene consultants and clarification of their mandate (L)</p>	<p>The industrial hygiene consultants' site supervision must reflect and correspond to the project's context and risk conditions when 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.</p>	<p>COMPLETE</p>
<p>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.</p>	<p>IA.18/EHS-02 Review and approval of the Asbestos Policy (L)</p>	<p>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.</p>	<p>ON TRACK</p> <p>Specific working group convened. Work in progress</p>
<p>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.</p>	<p>IA.21/EHS-05 Awareness (L)</p>	<p>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>	<p>ON TRACK</p> <p>Work in progress.</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) Regularly review operations to promote continuous improvement.	<div style="background-color: #4CAF50; color: white; padding: 2px; text-align: center; font-weight: bold;">ON TRACK</div> <p>Specific working group convened. Work in progress</p>
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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-President 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 Operations 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-President (Administration and Finance)