



## Canadian Horticultural Council Response: Stakeholder Consultations on Mandatory Requirements for Employer-Provided Accommodations in the TFW Program

### Introduction

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On behalf of the Canadian Horticultural Council (CHC) and the fruit and vegetable farmers we represent, we are sharing with you our comments on the Government of Canada's Temporary Foreign Worker Program Housing Consultation.

The Canadian Horticultural Council is an Ottawa-based voluntary, not-for-profit, national association that represents fruit and vegetable growers across Canada involved in the production of over 120 different types of crops on over 14,000 farms, with farm cash receipts of \$5.4 billion in 2019. Since 1922, CHC has advocated on important issues that impact Canada's horticultural sector, promoting healthy, safe and sustainable food, and ensuring the continued success and growth of our industry.

We support the Government of Canada's efforts to ensure all temporary and seasonal foreign workers have access to safe, clean and comfortable accommodation. While the vast majority of fruit and vegetable growers across Canada provide comfortable living conditions for their workers, it is also clear that a very small minority do not, and that is not acceptable. We agree that improvements to the system are achievable. Fruit and vegetable farmers rely on our labour force to produce fresh fruit and vegetables for Canadians, and providing adequate accommodation serves in our best interest. The CHC looks forward to engaging with the federal government as a solutions-oriented partner throughout this consultation process.

In the Canadian Agriculture Human Resource Council's (CAHRC) 2019 Labour Market Information (LMI) study, farmers identified a number of barriers in their ability to hire Canadians. It is evident that these barriers are acute in Canada's horticulture sector, where 72% of horticulture farmers identified manual labour as a barrier (compared to 54% for agriculture in general), and 66% identified seasonal nature of work as a barrier (compared to 43% for agriculture in general). Other factors impacting access to domestic labour include rural location of operation, and declining population in rural communities, among others. Similar stats apply to their ability to retain workers.

In Canadian horticulture, 43% of workers are foreign, compared to 17% for the rest of agriculture. Furthermore, 61% of horticultural farmers hire foreign workers, compared to 35% of the rest of agriculture. It is evident that fruit and vegetable farmers are particularly reliant on international workers and would be acutely impacted by any changes to the program and its requirements. Therefore, it is critical that the federal government strongly consider the views expressed in this submission. Without consideration to the impact these requirements will have on fruit and vegetable growers, Canada could very likely see a large reduction in the number of fruit and vegetable farms, and Canadians will have less access to safe, high-quality, Canadian-grown produce.

### General Principles

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#### Requirements must be evidence-based

CHC is committed to ensuring that all workers who come to Canada are provided with safe, clean and comfortable housing. CHC respects the Government of Canada's intention of improving housing for international farm workers. Growers have – for years – worked with their local and provincial health authorities, fire departments, building inspectors and others, to ensure that housing is adequate and meets stated standards.

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Given the potential time, resources and financial expense to meet any new housing requirements, changes to housing must show demonstrable impact to improving worker health and safety and must be practical. Timelines for implementing changes must be reasonable, and take into account the length of time required to obtain the proper permits, hire contractors and purchase supplies. There should also be consideration given to provide different guidelines for existing housing versus new builds.

For example, bunkbeds have been used by employers and have been approved by local health authorities for decades. CHC is concerned by the consultation's negative representation of bunkbeds as inherently bad and directly contributing to overcrowding and poor living conditions, as well as acting as an amplifier of disease transmission, especially since no evidence is offered to support this premise. To the contrary, there is plenty of evidence that a wide range of physical arrangements can achieve public health objectives when coupled with appropriate precautions<sup>1</sup>. Industry and government can – and must – work together to arrive at housing standards that are evidence-based, practical and provide adequate, safe and comfortable environments for workers.

### **Consideration of Provincial and Local Jurisdiction and Authority**

The consultation document states that current housing standards are inconsistent due to housing standards being under the responsibility of Provinces and Territories (PTs), or in some cases delegated to the municipalities or private inspectors. It further suggests that this has resulted in inadequate accommodations. While we would never aim to suggest that *all* housing is completely satisfactory across Canada, we believe it is inaccurate to suggest that local or provincial governments are at fault for inadequacies or that the whole system, as it exists, is not meeting its mandate of ensuring proper housing. Rather, we must consider why housing requirements are not static across PTs or municipalities. There are many considerations that go into determined housing requirements at the PT or local level: zoning issues, spacing, use of utilities and resources, existing building codes and laws, etc.

In order to receive an approved LMIA, the employer must prove that they have passed a housing inspection. Ultimately, as it currently stands, the default federal minimum standard applies *where provinces do not have an existing standard in place*. Therefore, if the intention of these proposed new requirements is to “complement existing provincial-territorial housing standards and establish consistent, mandatory requirements for all employers who must provide accommodations to TFWs”, then we must caution against pursuing consistency for its own sake for areas in which provinces or municipalities have a history of well-established and enforced standards.

### **Protocols Must Not Be Overly Prescriptive or Specific**

CHC suggests that the proposed federal accommodation requirements are too specific. Given the diversity of farm sizes, types of worker housing, and PT and municipal requirements across the country, prescribing such specificities as the proposed ratios of appliances to workers, and requirements such as providing desks and padded chairs in bedrooms, leaves employers with perfectly acceptable housing at risk of being non-compliant.

The proposal for minimum housing requirements includes that the building must be accessible to the public. This is highly concerning for various reasons. As acknowledged in the consultation backgrounder, biosecurity and public health considerations must be respected. Furthermore, as farming is more often than not a family business, the farmers also live on the premises. Free public access to private property is totally unacceptable to the farming community.

CHC believes that the themes outlined in the proposed requirements are suitable, but the elements are too specific. We appreciate that there must be a balance between being too broad and too specific, therefore we believe that many of the proposed requirements are more suitable as suggestions.

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<sup>1</sup> <http://ph.lacounty.gov/media/Coronavirus/docs/settings/GuidanceBedPositions.pdf>

## Looking Ahead

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What we have heard from a number of growers is that the proposed requirements are not necessarily valued by the employee (one example is having a padded chair in each bedroom). Housing challenges today can be attributed to a lack of effective enforcement action and a confusing inspections process.

Improving the inspections process and ensuring enforcement actions are applied when necessary would have a much greater impact on improving housing conditions than the proposed requirements. Many of the proposed requirements could be provided as guidelines, but not as required elements in all TFW housing. ESDC should aim to educate and/or discipline employers who do not have adequate housing, rather than subject all employers to overly and confusing prescriptive requirements.

Educating all employers and employees on their respective rights, obligations and responsibilities would help improve enforcement of the housing requirements. CHC will be happy to work with the various government departments and source countries to better educate both parties on requirements and the consequences of not meeting them.

## Response to Consultation “SECTION A – Questions for All Stakeholders”

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### *Adequacy of Proposed Requirements*

**Question 1.** Do the proposed federal accommodation requirements cover the right elements to ensure improved living conditions for TFWs? Are they specific enough to allow for proper implementation and assessment?

**Answer:** CHC suggests that the proposed federal accommodation requirements are too specific. Given the diversity of farm sizes, types of worker housing, and PT and municipal requirements across the country, prescribing such specificities as the proposed ratios of appliances to workers, and requirements such as providing desks and padded chairs in bedrooms, leaves employers with perfectly acceptable housing at risk of being non-compliant.

CHC believes that the themes outlined in the proposed requirements are suitable, but the elements are too specific. We appreciate that there must be a balance between being too broad and too specific, therefore we believe that many of the proposed requirements are more suitable as suggestions.

We recommend modifications to the proposed requirements that fall into three broad categories:

- Changing numerical/prescriptive requirements outlined in Annex A to outcomes/deliverables, in particular where existing public health experience shows that public health officials are capable of, and accustomed to, ensuring (enforcing) these outcomes using their professional discretion rather than through prescriptive specifications. An example of this is adequate refrigerator space, which is more likely to be correctly assessed by a public health professional than through a rigid ratio of “X” workers per fridge with no information about space or cooling capacity.
- Where a numerical/prescriptive requirement cannot be avoided, broadening fixed (rigid) proposed values in Annex A to a recommended range, in particular where existing public health expertise has established that values other than the proposed value are acceptable.
- Removing requirements in Annex A that are overly burdensome. An example of this is the proposed requirement for mandatory A/C cooling capacity which exceeds any standards that landlords of “regular” Canadian tenants are expected to meet.

A detailed list of recommended modifications to the proposed requirements is provided in Appendix A.

**Question 2.** Do the proposed requirements meet the objective of ensuring adequate personal space and privacy and eliminating the risk of overcrowding? In particular, are the proposed ratios of workers to sleeping quarters and essential amenities adequate?

**Answer:** Again, we suggest that the proposed requirements are too specific and will be very difficult or impossible for a large number of employers to implement. For example, the ratios of workers to sleeping quarters and amenities to workers does not take into account that these accommodation requirements are already determined at the municipal level. Municipalities have determined these based on a number of factors and considerations, such as the availability of land, fire codes, and demand on utilities (such as gas, electricity and water), among others.

It also bears reminding that workers do not spend a great deal of time in their living/sleeping quarters, and that washroom amenities and personal space is available to workers outside of their living space.

**Question 3.** Should there be different requirements for workers who work in year-round jobs (e.g. greenhouses, mushroom production) vs. seasonal jobs?

Generally speaking, we do not believe there should be different requirements for workers who work in year-round jobs vs. seasonal jobs. All workers should be provided the same adequate standard of houses, regardless of their work contract. There might be some exceptions to this, and recognize that there are different housing types used for longer-term workers in some cases, such as single dwellings, which should be considered.

**Question 4.** What are possible approaches to better ensuring that workers have adequate freedom to come and go and are able to receive guests?

**Answer:** 2020 has been an exceptional year for Canadian fruit and vegetable production, including in maintaining worker housing. However, in a *normal* year, workers are free to come and go off farm when they are not working. They may not have immediate availability to walk to a store or drive somewhere on their own, but that is a result of the rural/remote location. Most employers ensure that workers have the opportunity to get into town to purchase the things they need on a regular basis. Workers are also able to make their own transportation arrangements, such as ordering a taxi, to get to where they need to off-farm.

Within reason, invited people that have signed into the farm (which is required to be compliant with CanadaGAP and enforces biosecurity rules) are able to visit the farm and/or worker housing. This is done with the consideration of respecting the privacy of the other residents.

Employers and workers should be enabled to continue making workable arrangements in accordance with applicable trespass laws and respecting the fact that employers remain accountability and liable for their workers' health and safety even while workers are within their employer-provided accommodations, which is particularly important in the current COVID-19 context.

When COVID-19 was not a concern for everyone's safety, it was very common for employees to have visitors such as spouses, friends, and employees from other farms.

We recognize that the government is concerned with the isolation workers have experienced as a result of COVID-19 measures. CHC sympathizes with the impact this has had on workers, but also would like to recognize that all Canadians are being asked to make sacrifices and are limited as to they we can see in person.

**Question 5.** Are there other aspects or alternative approaches that should be considered?

**Answer:** CHC strongly supports more efforts to make sure that workers feel connected to their communities in Canada, and have access to healthcare and religious and cultural events and services. To that end, we support more resources dedicated to the nation-wide rollout of the Hub app, created by the Ontario Greenhouse Vegetable Growers. The Hub app is a great resource for workers to not only help them feel connected in their new communities, but can also disseminate vital public health and safety information, as well as information about the SAWP and TFWP.

We would also like to see more encouragement of the use of outdoor and community spaces, such as parks, sports facilities, and so on.

We also feel there is a need to educate worker support networks on the program rules and requirements. What we have heard from our member associations is that these networks, while well-meaning, often do not have an intricate understanding of the program rules and protocols. Better educating them on the program would provide them with means to better serve workers.

### ***Public Health Considerations***

**Question 6.** Would the proposed requirements assist in mitigating public health risks associated with pandemics and/or communicable diseases? What adjustments should be considered?

**Answer:** CHC strongly believes that where requirements are being proposed to mitigate risks associated with communicable diseases, evidence must be presented to provide justification.

CHC would like to inquire as to whether there were reports or studies done following other outbreaks and pandemics in Canada such as H1N1 or SARS, and what the impact on communal housing rules were.

As well, changes to behaviour among workers will be needed, beyond just adjustments to physical structures. It will take a consolidated effort on the part of workers, employers, source countries and governments in Canada to address behavioural change through culturally-appropriate education and public awareness.

**Question 7.** Are there additional requirements that should be considered to make living quarters more adaptable to pandemics and/or communicable diseases in the future?

**Answer:** CHC must reiterate the above point that where requirements are being proposed to mitigate risks associated with communicable diseases, evidence must be presented to provide justification.

Beyond adjusting living spaces, governments at all levels must develop more emergency preparedness protocols and improve communication across the various levels and departments of government. If we take the experiences and lessons learned from the first wave of the COVID-19 pandemic, a better sharing of best practices, more timely information on outbreaks, better government supports for off-farm housing for the purpose of quarantining should all be considered in government and industry efforts to be more adaptable to pandemics or communicable diseases in the future.

Another lesson learned is that information must be made available to international workers in applicable languages and that which is culturally appropriate.

### ***Impacts of New Requirements***

**Question 8.** What would be the impacts for employers in terms of investments to adapt to proposed new standards? How could these impacts be mitigated?

**Answer:** The impact for each grower is dependent on a number of variables, such as the size of farm, number of employees, and region, among others. The impact is also largely dependent on how fast would government would want the new requirements to be implemented.

In most cases, the new ratio requires and limitations proposed on sleeping quarters would amount to doubling the size of accommodations – which would obviously require a large investment, and in some cases may not even be plausible.

CHC has already heard from growers who have said that, should the government go forward with the proposed requirements around ratios and limits to sleeping quarters, they will have no choice but to retire early and/or shut down their operation.

Impacts can be mitigated by allowing growers who already adhere to accepted standards either at the municipal or PT level to continue to meet those standards without the requirement to retrofit to the new federal standards.

If government does not take this approach, then the following must be considered to mitigate the impact:

- 1) Realistic timelines for implementation and adherence to new standards. We assume this to be a minimum of seven years;
- 2) Cost-sharing between provincial/territorial and federal governments and growers; and
- 3) A loosening of the requirements, particularly around ratios and limits on sleeping quarters. More information on this can be found in Appendix A

**Question 9.** What would be the implications of moving away from the use of bunkbeds? Are there alternative designs or approaches to bunkbeds that would meet public health objectives and improved living conditions?

**Answer:** Generally, for a large number of growers this would mean that they would have to cut the number of employees they can house in half. This would obviously directly correlate with their production capacity and would mean a drastic decrease in the volume of fresh produce grown and harvested in Canada.

In cases where employers do not have the resource and physical constraints to expand their housing facilities, they would see a doubling of accommodations for workers. Estimates from Ontario, Quebec and BC show a cost of \$15-20k per worker for adjustments, to upwards of \$35-50k depending on how far new requirements go [pending more information].

For reasons previously mentioned, municipal permit restrictions and lack of infrastructure will make it virtually impossible for a number of growers to eliminate bunkbeds, because they simply cannot house that number of workers in any other capacity.

**Question 10.** What other factors would affect the ability to implement new requirements?

**Answer:** The three main factors that would affect the ability to implement new requirements are:

- 1) Time: timelines need to be realistic and practical
- 2) Support from the government: funding to retrofit or build new housing must be available to growers
- 3) Red tape reduction: all three levels of government must work quickly to reduce regulatory red tape

There are also local constraints that would interfere with farms' ability to get the building permits required to implement and/or comply with some of the proposed new requirements:

- Landlocked – some farms are zoned in restrictive municipal zones (e.g. Greenbelt in Ontario) and are unable to add buildings on their property. Adding accommodation space in these instances will be effectively impossible, especially in rural areas where there is no access to existing accommodations like houses, hotels, etc.
- Rental land – a lot of farmland is rented, so new housing cannot simply be built on the landlord's land.
- Size-dependent thresholds for additional permits – it is anticipated that changes in ratios would trigger a septic review by municipalities, even if the number of inhabitants remains the same. It is unclear if and how a municipality would proceed in this event.

A mechanism should be considered to support farmers in these scenarios. Without support or flexibility, farmers in these scenarios would mostly likely be forced to reduce their workforce which would almost certainly lead to a reduction in capacity to produce local fruit and vegetables.

**Question 11.** Are there implications from the perspective of PTs, including impacts on laws and regulations that would affect implementation?

CHC endorses the answers submitted from our member associations to this question, as they are in the best position to answer this based on their respective province (or territory).

**Question 12.** What could be the anticipated timelines for implementing new requirements such as these?

**Answer:** Growers would need several years, realistically, to implement these new requirements. A minimum of seven years is required.

**Question 13.** There are differing approaches to the amount charged to workers for accommodations under the program. In some cases, accommodations are provided free of charge, while in other cases workers are charged a weekly amount. To what extent should employers vs. workers be responsible for paying the cost of accommodations? What factors should be considered and why?

**Answer:** Realistically, we do not see this being an issue participating SAWP countries would want to explore. It is very likely that the status quo on deductions will continue. Industry is not able to control what can be deducted, particularly under SAWP. This question should be posed to the source countries to find out what they would be willing to negotiate.

The answer to this is complicated by the multitude of TFWP streams and countries with which arrangements are established. It is important to maintain a level of equity with local workers, meanwhile having different accommodation cost allocation models for SAWP vs. Ag Stream TFWP employees will create further inequity within the workforce.

### ***Inspections***

**Question 14.** Would such measures serve to strengthen the consistency and quality of the accommodations inspections process for the TFW Program?

This could be an accessible and meaningful way to achieve our common goal of ensuring all employers are providing adequate housing to their workers. From our perspective, there are currently too many inspectors and it would benefit all to have it better harmonized and to share information across levels of government. Ontario and the federal government are looking at this. If it is successful, it can be rolled out across the country.

One key recommendation to the federal government is: don't come at all employers with a big stick; instead, target resources to educate and work with employers who are not compliant to ensure they are able to meet requirements and penalize those who are knowingly and willfully not meeting standards of adequate housing. We believe this would be more successful than trying to go after everyone, including employers who have been compliant under existing requirements for many years.

**Question 15.** More generally, what other aspects or alternative approaches should be considered to ensure compliance with new requirements both before and after workers arrive?

Again, target the small number that are not compliant and dedicate resources there. Harmonize and share information across government levels and departments.

Federal and provincial government should build on existing cooperation between their inspection departments to streamline inspections of TFW-employing farms. Currently, farms are inspected locally, provincially and federally. In addition, recognize and leverage the fact that farms are subject to visits from the liaison officers of their workers' country.

**APPENDIX A – CHC comments on specific recommendations for proposal elements**

Proposal element	Proposed requirement	Recommendations
Building structure	Accommodations must be sound as per PT building codes, fire codes and health and safety legislation	CHC in agreement with proposed requirement.
	The building must be accessible to the public	As previously stated, this goes against existing provincial laws in some cases and contravenes farm security and biosecurity measures. It does not take into consideration the privacy and safety of other workers in the housing building or of the building owner/business operator. Farms and their corresponding housing establishments are private businesses and private property.
	Housing must allow for a range of 20°C– 25.5°C to be maintained in all areas at all times	Temperature ranges should be suggested, but should not be prescribed. Some workers have a personal preference for temperatures above or below this given range. The range of comfortable temperature is a matter of preference; rather, proper air circulation should be ensured.
	Housing must have heating and A/C to maintain this range	A/C should not be required, as many personal dwellings across Canada do not even have A/C. As long as the housing is maintained at a comfortable temperature range and air is properly circulated, there should be no additional requirements for any sort of equipment.

	Sufficient furniture should be provided dependent on the number of workers housed in the accommodations	Support in principle, but this requirement is too vague to fully support.
	Furniture should be of sound construction and in good condition.	CHC is in support of this proposed requirement, with the recognition that maintaining the condition of furniture is also dependent on the occupants.
	A maximum occupancy rate of 7.44 sq. m (80 sq. ft) of total usable, and unobstructed floor area per person for common living spaces	Recommend 80 sq. ft total common space per person (including sleeping, living and eating areas, but excluding washrooms).  Rather than targeted ratios for each portion of the housing e.g. living rooms, have a required outcome of <i>adequate common area outside of the sleeping quarters</i> where people can spend leisure time.
Sleeping quarters	Maximum of 4 persons per room	Allow for a flexible number in line with the cohort size being observed, in consultation with local health authority.
	Minimum 2m between beds	Replace single value with a target range which reflects complementary public health measures that can be taken to achieve the goals behind this proposed value. Include Ontario's 18" minimum or another acceptable public health-based alternative in the range.
	Desk required per room	Overly prescriptive and not always practical. Already covered by general furniture requirement
	Waste basket per room	Members have raised concerns about this, as in order to respect privacy, employers do not enter workers' sleeping quarters while occupied and therefore are not responsible for emptying said waste paper basket. Occupants have not taken on the responsibility of emptying waste paper baskets, increasing the risk of a build-up of waste material in sleeping quarters and possible subsequent pest infestations. If waste paper baskets are to be provided, the occupants must bear the responsibility of emptying it on a regular basis.  Replace by required outcome of <i>sufficient garbage containers to store garbage between garbage collections.</i>
	Padded chair per room	Overly prescriptive and not always practical. Already covered by general furniture. Requirement.
	Minimum one coat hook per person in bedroom	Change to one coat hook per person in building.

	Door and a mortise-type lock per room	Remove and defer to local fire department, as they prescribe safety measures around doors and locks.
	All beds must consist of a proper bed base/frame at least 20 cm (7.87 inches) off the floor; mattress min width of 38" (95.6 cm); min length of 75" (190.5 cm), min height of 25" (63.5 cm)	Should be consistent with common bed sizes – therefore 75" should be changed.  We have also received clarification from the department that the minimum height is meant to be in centimeters (25 cm), rather than in inches.
	Linens package which includes a minimum of 2 pillowcases, 2 sheet sets and at least 1 blanket per bed	CHC is in support of this proposed requirement.
	Adequate, enclosed, storage space/compartiment within a reasonable distance from the bed, which may take the form of one locker OR one shelf OR a small dresser (2-4 feet in size)	Provide a storage per person in the bedroom OR another common space.
	Review approach to bunkbeds, including alternative designs/approaches that would meet public health objectives and improved living conditions.	Remove and leave to provincial and local public health departments.
	Males and females cannot share a bedroom (unless they are spouses)	CHC is in support of this proposed requirement.
	Workers should be provided their own individual bed and are not required to share a bed with anyone other than a spouse.	CHC is in support of this proposed requirement.
	Spouses should be provided with a double/queen size mattress.	CHC is in support of this proposed requirement but suggest adding a clarification that this applicable IF the spouses wish to share a mattress.
Washroom facilities	All washrooms must be within worker accommodations.	We recommend that this be dictated by territorial agencies in recognition of established regional guidelines.
	Washrooms to be separated from sleeping rooms by full partitions and lockable doors and to have separate ventilation with exhaust fan.	CHC is in support of this proposed requirement, so long as "or window" be added to follow "to have separate ventilation with exhaust fan".
	One (1) toilet for every five (5) workers.	In many cases, this would equate to a dramatic increase from current requirements and would put a lot of demand on water supply.  We would need to see justification for this ratio, and it must consider that toilets and amenities are also available in the field or principal business for employees to access.  Replace single value with a target range.

		Include established public health-approved ratios (e.g. one for every 10 workers) in the range. In addition, urinals should be recognized as equivalent substitute for every second toilet in washrooms for male occupants.
	1 shower, opaque privacy barriers, for every 4 workers. Each shower to have an adjacent dressing cubicle with curtains, a hinged seat on the wall or a bench seat and 2 double clothes hooks.	Replace single value with a target range.  Include established public health-approved ratios (e.g. one for every 10 workers) in the range  Remove dressing cubicle requirement.
	1 sink furnished with a mirror above for every 4 workers with hot and cold running water.	Replace single value with a target range.  Include established public health-approved ratios (e.g. one for every 7 workers) in the range.
	Urinals shall be furnished at the ratio of 1 per 15 persons.	Urinals should be optional to add over and above the minimum toilet ratio. [Note: urinals are not applicable to female occupants]
Eating facilities	1 dining set with table and chairs in good condition for every 10 workers	Remove and replace with required outcome of <i>adequate number of tables and chairs for dining.</i>
	1 microwave for every 10 workers	Remove and replace with required outcome of <i>adequate number of microwaves.</i>
	1 oven and stove; minimum of 4 functional burners for every 6 workers	Remove and replace with required outcome of <i>adequate number of stoves.</i>  [Note: Any firm ratios would have to take into account the vastly different capacity of commercial/industrial vs residential stoves]
	1 refrigerator with sufficient space for food storage for every 6 workers	Remove and replace with required outcome of <i>adequate number of refrigerators.</i> [Note: Any firm ratios would have to take into account the vast range of capacities and sizes of fridges]
	Adequate cabinets and shelves for cooking equipment and food storage	CHC is in support of this proposed requirement.
Laundry facilities	Worker accommodations must contain free laundry facilities for the workers	Need to add clarification that ensuring weekly access to laundromat is an acceptable alternative, consistent with SAWP contract language.
	1 full-sized washer and dryer for every 10 workers.	Defer to provincial or municipal standard, as some do not allow for dryers in shared-occupancy dwellings. Many employers provide a wash basin and clothing line for washing and drying.

		<p>If the direction is that a value is needed then replace single value with a target range. And add clarification that ensuring weekly access to laundromat is an acceptable alternative, consistent with SAWP contract language</p> <p>Allow clothes lines as alternative to dryer. [Note: Lint screens in dryers can present a fire hazard and may not be desired by workers.]</p>
	Additional drying facilities (e.g. clotheslines) must be in laundry area and not in the bedrooms.	Most drying facilities, particularly clotheslines are kept outdoors.
	Facilities used to clean personal protective equipment (e.g. spray masks, rain gear, gloves) must be separate from laundry machines and living areas.	CHC supports this proposed requirement, however protocols on using and handling protective equipment already prescribe that they should not be kept in laundry or living areas.
	Access to phone service and free internet will be provided where available.	<p>Phone: Most workers have their own phone and service/data. It is unclear what precise problem this proposal is designed to fix</p> <ul style="list-style-type: none"> <li>• If the intent is to provide an emergency access to a phone for the event when a worker is unable to use their own, the proposal should be worded that way.</li> <li>• If employers are to play a role in ensuring access to phone service, then the SAWP contract should be modified to allow for the employer to recover associated costs.</li> </ul> <p>Internet: Should be an aspirational goal. Some employers provide it now, but it isn't always an option plus it can be VERY expensive in rural areas.</p> <p>Recommend developing a mechanism in the SAWP contract that would allow internet to be provided by the employer on a cost recovery basis.</p>