

Working Conditions, Health of the Trucking Supply Chain, Community Well-being and Public Safety from Collisions on Ontario's Highways

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To Standing committee on social policy
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99 Wellesley Street West
Toronto, Ontario

A Written Submission on Bill 27, an Act to amend various statutes with respect to employment and labour and other matters

submitted by Dr. Ted Harvey and Dr. Phil Bigelow

We are writing to comment on the provision in the Bill 27 materials related to the provision of washrooms. We also address related conditions of work. Our comments are aimed particularly at the long-haul trucking industry, based on learning from a major research study we conducted for the Ministry of Transportation in 2018, and follow-up research underway now, in 2021¹.

Access to Washrooms: ready access to washrooms at the point of delivery was noted as an important need by hundreds of the drivers we surveyed in 2018. They indicated that lack of access was common, especially when deliveries are delayed by the destination managers, and that this disrupted the planful completion of deliveries. This was a particular concern when drivers are required to wait for a long time, by destination managers. This was deemed harmful to the overall health of the trucking supply chain. In the same vein, drivers were almost unanimous (94%) in rating access to washrooms as essential at stops.

¹ The study was an independent, \$280,000 review conducted by SPR Associates Inc. of Toronto, led by an international panel of experts, and included engineering studies and surveys of 2,300+ North American long-haul truck drivers. Research since 2018 includes small surveys conducted in 2021. See end for details on Dr. Harvey and Dr. Bigelow.

Access to washrooms was also deemed to be essential from the point of overall driver health and well-being. Thus, we conclude that access to washrooms is an essential feature of Bill 27 in terms of health and safety needs. We note as well, that such access is highly desirable for the workings of the trucking supply chain overall, which we all rely on for access to food, medicine, and other necessities.

Related conditions of work: at the same time the legislature is examining access to washrooms, it should re-examine a range of factors in work as they are found in the trucking sector. There are numerous features of this work which are detrimental to the health and well-being of long-haul truck drivers, and thus harmful to all Ontario families and communities.

Key elements are the lack of sufficient places to stop and rest along the highways, which results in poor health for drivers, and an elevated risk of truck collisions when drivers are tired -- endangering the population generally. This requires careful regulation, since the starting point for drivers is a 13–14-hour day as set by current federal-provincial Hours of Service regulations. Many other conditions of work regulations may require review as well, such as the way drivers are classified as employees or independent contactors. Overall, these regulations require careful examination as they relate to public safety, and broader issues such as shortages and inflation.

We would be pleased to meet with your committee if desired to discuss these matters.

Sincerely,

Dr. Ted Harvey, Director of Research, and

Dr. Phil Bigelow, Health and Safety Specialist

About the authors: Dr. Ted Harvey and Dr. Phil Bigelow have each worked in Workplace Health and Safety for decades and have most recently worked together on issues related to trucking and transportation.

Dr. Ted Harvey, President and Senior Consultant, SPR Associates, has over 30 years experience in public policy research, conducting over 200 policy studies and evaluations for Ontario and Canada, much of it involving large scale surveys. Much of this work was in housing and First Nations issues, but the largest part has been in workplace health and safety. For example:

- his research for the Ontario Ministry of Labour and its agencies, and The Ontario Federation of Labour surveyed 6,000+ joint health and safety committee co-chairs in over 3,000 workplaces in all sectors in 1985-86, aiding design of *the OHS Act of 1990*.
- *similar surveys were conducted with 3,000+ JHSCs in 1992 to 1996, within a \$1.2 million program of research, aiding the development of Ontario's certification training in OHS, (now with about half a million Ontario worker and management JHSC members certified.*
- His 2014 presentation to the Federal-provincial Ministers of Labour was influential in bringing psychological health and safety more fully under Federal-provincial legislation. More recent work with unions includes OHS projects conducted with OPSEU and CUPE. (included a review of OHS in Ontario Children's Aid Societies (2014-2017) which surveyed over 7,000 child protection workers, and covered issues as diverse as broad OHS management, and technology for aiding OHS for lone workers.
- In the period 2014-2021, his main work in OHS has focused on trucking and truckers.

Currently he is leading a campaign to improve working conditions, and truck parking on Ontario Highways, and to improve the overall health of the trucking supply chain.

Dr. Phil Bigelow is an Associate Professor in the School of Public Health Systems at the University of Waterloo. He is an occupational epidemiologist and teaches epidemiology and occupational health in professional and research-based programs at the University.

He holds an appointment at the Institute for Work & Health where he was a specialist in intervention studies prior to joining the University of Waterloo. His research interests include understanding and reducing chronic disease risk factors in transportation sector employees and finding ways to improve the implementation and uptake of health interventions in trucking.

He has conducted research in the transportation sector since 2004 and has a special interest in the health of truck drivers. He was member of research team headed by Dr. Richard Wells that, through a collaborative, participatory approach, implemented best practices in Musculoskeletal Disorder (MSD)-reduction strategies in the transportation sector. He has also collaborated with a team of investigators from the Institute for Work & Health, NIOSH, and Humber College (home of a truck driving school) in the development of studies of the health of truck drivers.

Most recently, he has worked to develop national research to improve the health and wellness of long-haul truck drivers (supported by the Canadian Institutes of Health Research as well as provincial workers' compensation boards). Since 2017, he has worked with Dr. Harvey on a study originally funded by Ontario Ministry of Transportation to examining truck parking on Ontario highways (scarcity and impacts).