



## Improving the IMIT Local Employment Requirement

**Date:** May 10, 2019

**To:** Economic and Community Development Committee

**From:** General Manager, Economic Development and Culture Division

**Wards:** All

### SUMMARY

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Council directed staff to consult with relevant stakeholders to determine what additional steps can be taken to ensure that those developments that receive Imagination, Manufacturing, Innovation and Technology (IMIT) incentives provide quality employment opportunities for Toronto residents. The direction included identifying opportunities in the building construction phase and developing a strategy to address precarious work among building maintenance employees and contractors. This report recommends a new administrative approach to the Local Employment Requirement for IMIT to provide for quality employment and training opportunities for city residents.

Consultations with IMIT recipient companies and their tenants demonstrated a willingness to support a wide range of City-endorsed programs but pointed to a need for clearer direction, objective measures of activity levels, and the flexibility to select the appropriate partners and activities. There are opportunities in the building construction phase as well as support for the reduction in precarious work among building maintenance employees and contractors as well as in the overall staffing for the users and tenants of the building projects that receive IMIT grants.

The report proposes a new administrative approach to a component of the IMIT Program, the Local Employment Requirement. It outlines a new points-based system which IMIT recipient companies and their property users can use to develop, implement and report on activities and outcomes for local employment plans in partnership with City-endorsed programs (Employment Service Providers and Youth Employment Partners). The points-based system provides a guideline for expected levels of activity from companies.

The proposed changes specify the target activity types and levels for IMIT-approved developments, the administrative roles for City staff, IMIT recipients and property users, and the expected outcomes of the points-based system.

The in-force IMIT requirement is for a local employment plan and engagement with the City to promote local hiring and training. The City will work with current IMIT recipients and new applicants to encourage them to use the points-based system to develop the required local employment plan in support of City-endorsed programs. It is expected that applicants will agree to utilize the points-based system given that it provides better certainty and assists them in easily meeting the requirement.

After the one year pilot period staff will analyze the results and report to Council with a recommendation on the possibility of amending the CIP to make the requirement mandatory.

## **RECOMMENDATIONS**

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The General Manager, Economic Development and Culture recommends that:

1. City Council direct the General Manager, Economic Development and Culture to implement a points-based system as outlined in Attachment 4 of this report to measure the levels of activity in the Local Employment Requirement of the Imagination, Manufacturing, Innovation and Technology (IMIT) program,
2. City Council direct the General Manager, Economic Development and Culture to report on the results of the implementation of the points-based system by the fourth quarter of 2020 and in the next scheduled IMIT policy review in 2022.

## **FINANCIAL IMPACT**

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Future operating and capital costs related to the City of Toronto's administration of the IMIT program will be recovered from IMIT recipients in the form of administrative fees as approved by Council.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial impact information

## **DECISION HISTORY**

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At its July 23-30, 2018 meeting, City Council directed staff to consult with relevant stakeholders to determine what additional steps can be taken to ensure that those developments that receive IMIT incentives provide quality employment opportunities for Toronto residents, including: Employment and training in building construction, a strategy to reduce precarious employment among building maintenance employees (including contract staff) and full participation by users of IMIT properties in City-supported programs intended to connect job seekers to job opportunities.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.PG31.5>

## COMMENTS

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### **IMIT program background and Local Employment Requirement**

The Imagination, Manufacturing, Innovation and Technology (IMIT) Financial Incentive Program (the "Program") provides incentives in the form of grants tied to increased municipal tax assessment to support the construction or major renovation of buildings in targeted employment sectors and uses. The purpose of the program is to support development and remediation for community improvement purposes. The program does this by incentivizing the construction of buildings that house jobs in targeted employment sectors, locations and uses.

Eligible developments benefit from a grant of 60 per cent of the increase in the municipal taxes attributable to the development over a 10-year period. When combined with the Brownfield Remediation Tax Assistance (BRTA) the incentive increases to a maximum of 77 per cent.

The Program was introduced in 2008 and reviewed with amendments made for the first time in 2012. It was reviewed again in 2018, with additional changes recently approved by Council. The enacting Planning legislation is currently under appeal to LPAT and thus the 2012 by-law is still in force.

Eligible recipients of the IMIT grant vary in both scale and sector. The current minimum required construction value is \$1 million, while there is no maximum value. Eligible sectors include Biomedical, Creative Industries, Information and Communications Technology, Manufacturing and Tourism Attractions. Eligible building uses include office buildings, film studios, food and beverage wholesaling, information services and data processing. Among the current program participants, over 50 per cent of developments are for office uses.

As of 2019, 46 developments have been approved for grants under the IMIT program. The financial benefits of these projects are substantial: It is estimated that the 46 approved projects will yield \$950M in new taxes over the 10-12 year grant payment period, while they will be eligible to receive \$589M in grants, resulting in a net gain of \$361M to the municipal tax base with full amounts being yielded after the grant period.

Since the program was created in 2008, successful applicants have been required to meet the "Local Employment Requirement" (the "Requirement") to receive the IMIT incentive over the 10-year payment schedule. The Requirement was initially designed to ensure employers occupying IMIT-supported developments promote participation in local hiring initiatives during the incentive period.

Local employment numbers (i.e. net new jobs) is not an eligibility criteria for assessing eligibility for participating in the program although it is one of the two fundamental reasons for the Program (the other is growth in investment, its related construction and

the related property taxes). With increased space comes added employment. The 46 projects referenced above have added 16 million square feet of space with an approximate total employment of 70,000 people. Estimates vary as to how much of this employment is additive to the city but it could be in the order of 14,000 jobs or approximately 20%.

The current **Local Employment Requirement (By-law 1323-2012)** outlines that:

*"The applicant or user of the property must agree to collaborate with the City to promote local employment. This will include a local employment plan that will identify opportunities for local hiring and/or training and document how the applicant or property user will utilize City-endorsed or sponsored employment programs. It is expected that the employment plan will span the term of the incentive and that outcomes will be tracked and documented."*

Applicants to the IMIT program are property owners who may be exclusive property owner-occupiers, not occupy the property themselves but lease it out, or have co-tenants. The Requirement is generally passed through from IMIT grant recipients to their tenants, or "property users". The City does not have direct contractual relationships with the property users who are tenants of IMIT grant recipients. As such, the City must rely on IMIT recipients (property owners) to ensure compliance of tenants in order to release a payment.

The demand for the program is growing, which presents an opportunity to increase the impact on local employment, but also indicates a need to streamline administration. Currently, there are 46 approved recipients and approximately 150 property users and this number is projected to continue to grow as the Program expands. The current system requires local employment and training activities to begin once the building is occupied and does not address the building construction period.

### ***Present administration of the Local Employment Requirement***

While the Economic Development and Culture division (EDC) administers the Program, Toronto Employment and Social Services division (TESS) has been EDC's primary partner for implementing the Local Employment Requirement. TESS provides employment supports, financial benefits and social supports to Ontario Works recipients living in Toronto and works within a vast network of employment service providers and workforce development organizations to support Toronto job seekers who are receiving social assistance and/or from equity-deserving communities. Equity-deserving communities refers to the equity-seeking groups currently identified by the City of Toronto: Persons with Disabilities, Women, Racialized group(s), Lesbian, Gay, Bisexual, Trans, Queer, Two-Spirit Communities (LGBTQ2S), Undocumented workers, Immigrants and refugees, Persons with low income and Youth.

Although TESS has been the main contact point for companies for participating in City-endorsed local employment and training activities, companies are permitted to work with other partners to meet the Local Employment Requirement subject to City approval. The

table below outlines the current roles of City staff, IMIT recipients and property users, and development partners.

**Stakeholder Roles in Present Administration of Local Employment Requirement**

Stakeholder	Current role
EDC	Manage overall process including marketing, eligibility screening, introduction to Local Employment Requirement, compliance checks and payment
TESS	Work with companies to develop local employment plans, supporting City-endorsed partners, activity and outcome-tracking and advising EDC on compliance status
IMIT recipients	Inform property users of compliance requirements of the program and facilitate direct relationship with TESS or do this themselves if they are the property user
IMIT property users (tenants who have the IMIT grant passed through to them)	Implement IMIT Local Employment Requirement as indicated in agreements with building owners
City-endorsed workforce development partners	Work with companies as referred or approved by TESS. Provide support to TESS in reporting outcomes as requested.

***Current eligible activities for meeting the Requirement***

There are currently four (4) activity categories presented to IMIT recipients/tenants for meeting the Requirement:

- 1) participating in community recruitment events or job fairs
- 2) listing of available job openings
- 3) working with TESS for pre-employment job screening and referral
- 4) providing mentorship, internship or apprenticeship opportunities through a variety of partner agencies

TESS works directly with a designated representative from IMIT property user companies, often in the human resources department, to implement the requirement.

### ***Impact of the Requirement***

The Local Employment Requirement builds on the IMIT program's purpose of supporting local job creation and retention through incentivizing building construction for targeted employment sectors and uses.

While there have been a variety of employment-related activities associated with IMIT developments and the companies involved, the impact of the Local Employment Requirement has varied widely depending on a few key factors: the size and types of developments; the business and corporate values of companies involved; and how the IMIT recipient involves its tenants in the Requirement (including if and how the incentive is "passed down" from property owner to tenant).

Generally speaking, larger developments have garnered more opportunities for hiring and training. Companies that have existing relationships with the City (e.g., through the Partnership to Advance Youth Employment - PAYE) have a clearer understanding of the City's inclusive workforce development objectives and how to get involved. Additionally, developments where the property owner is also the main property user, and where there are fewer yet larger tenants, have been easier to administer and track.

Though some results have been achieved for local hiring and training of local, low-income and equity-deserving job seekers, overall, optimizing the impact of the Requirement has been a challenge for staff to due to a lack of specificity of expected levels of company participation in the Requirement.

### **Aggregate Summary of Local Employment Requirement Activities (2011-2018)**

Year	# of IMIT companies in program	# of IMIT companies provided job postings	# of job postings provided by IMIT companies	# of hires by IMIT companies	# IMIT companies participating in an employment event (e.g. Learning/Networking/Job Fairs)
<b>2011</b>	14	2	3	3	1
<b>2012</b>	14	8	13	12	1
<b>2013</b>	14	4	64	24	3
<b>2014</b>	15	6	56	10	1
<b>2015</b>	33	7	14	5	1
<b>2016</b>	35	13	33	7	4
<b>2017</b>	52	19	23	19	8
<b>2018</b>	52	32	65	19	23*

Year	# of IMIT companies in program	# of IMIT companies provided job postings	# of job postings provided by IMIT companies	# of hires by IMIT companies	# IMIT companies participating in an employment event (e.g. Learning/Networking/Job Fairs)
<b>Total</b>		91	271	99	42

\*In 2018, 20 companies participated in a total of 23 events. In all other years each company participated in one event.

### **Opportunities to improve the impact of the Local Employment Requirement of the Program**

In 2018, City Council directed staff to consult with relevant stakeholders to identify steps that can be taken to ensure that developments that receive IMIT incentives provide more quality employment opportunities for Toronto residents.

Staff and key stakeholders saw an opportunity to provide a methodology that would improve operational efficiency and provide more certainty to program recipients, while aligning with City programs (i.e. The Community Benefits Framework, Social Procurement Program and the Construction Connections Program.)

#### ***Summary of Background Research***

The background research involved reviews of both internal information and external research. During the review, staff researched City of Toronto strategies, documents and staff reports to Council. These included IMIT documents, the City's Social Procurement Policy, The Rexdale-Casino Woodbine Community Benefits Agreement, Eglinton East LRT, Eglinton Crosstown, Fair Wage Policy, reports on job quality, fair and living wages in the City's custodial services contracts and initiatives that address the workforce development needs of equity-deserving communities (e.g. Construction Connections, Youth Equity Strategy, Poverty Reduction Strategy, Confronting Anti-Black Racism Action Plan).

External documents that were reviewed covered four thematic areas: community benefits and social procurement, construction and building maintenance industry trends, precarious work, and the role of companies in workforce development. Research came from non-profits and think tanks (e.g. Metcalf Foundation, Mowat Centre, United Way of Greater Toronto, Toronto Community Benefits Network, and the Toronto York Region Labour Council), academic institutions (e.g. York University, Ryerson University), community legal and labour organizations (e.g. Parkdale Community Legal Services, Workers Action Centre) and industry publications (e.g. Ontario Construction Secretariat and Deloitte.)

A jurisdictional review of tax increment financing programs and community benefits agreements (specifically workforce development provisions) included neighbouring municipalities in Ontario (Hamilton, Vaughan, Niagara Region, Mississauga), as well as American jurisdictions (New York, Chicago, San Francisco). Relevant provincial legislation was also reviewed in the context of opportunities in building construction and employment standards.

A summary of relevant background research findings can be found in Attachment 1.

### ***Summary of Stakeholder Consultations***

Consultations were undertaken with 76 stakeholders, ranging from those with the most direct experience administering and implementing the Local Employment Requirement to external stakeholders that could provide input on issues and activities related to building construction and precarious work.

Consultation methods included interviews and data review with program administrators, a survey administered to IMIT recipients and property users, in-person and telephone interviews with IMIT recipients and property users, construction industry representatives and community benefits groups, and round table discussions with precarious work experts, and City-endorsed/sponsored workforce development partners.

An inter-divisional working group representing EDC, TESS and SDFA met monthly from November 2018-March 2019 to oversee progress and collaboratively engage stakeholders. Legal Services, Internal Audit, City Planning, Corporate Finance, Financial Planning and the Fair Wage Office were also consulted in the development of this report.

### ***Summary of challenges and opportunities identified during consultations***

The following observations were made in the consultation process which should be addressed to ensure better participation of recipients and property users in the requirement:

- **Transparency:** Property users indicated that at times they did not know if they were in fact receiving a transferred benefit from the IMIT program, and as such did not feel incentivized to participate in meeting the required local employment activities.
- **Specificity:** IMIT recipients shared the need for detailed language built into the incentive agreement that could be subsequently transferred to property users through individual lease agreements.
- **Fairness:** Both recipients and property users requested the option to exclude non-compliant tenants from the incentive so that other compliant tenants in an IMIT building do not have to suffer the consequence of a withheld payment.



The City's workforce development partners identified the following issues and opportunities for improving participation rates:

- There is a stigma that exists against users of employment services. Removing barriers to equitable hiring and changing employer perceptions are the most important precursors for successful participation in hiring and training for individuals using City-endorsed programs.
- Relationships between a company and workforce development organization are generally more effective when there is long term one-to-one engagement. While many different types of service providers are active in workforce development, there is a trend toward organizations offering a range of services and wrap-around supports, suggesting it is possible for IMIT recipients/property users to complete all or most of their employment and training activities through one partner.
- Workforce development partners and companies both recommended that the City use its convening power to form a peer-to-peer network of companies to exchange best practices in equitable hiring and workforce development.

During the consultation period, IMIT administrators and companies who are most closely familiar with the requirement also raised the following general considerations and opportunities for revising the Requirement, which fall into three themes and are detailed in the following table:

Theme	Challenges	Opportunities
<p>Employment and training benefits (including building construction and building maintenance)</p>	<ul style="list-style-type: none"> <li>• Property users do not have a high volume of direct job opportunities and prefer to manage recruitment/screening</li> <li>• Matching of job seekers to opportunities available is often not a good fit due to the high-skill nature of the roles available</li> <li>• Companies lack clarity on what options exist and what activity levels are required to achieve compliance</li> </ul>	<ul style="list-style-type: none"> <li>• Property users are receptive to an expanded menu of options beyond the current four options offered, so they can select which are most aligned with their business from year to year</li> <li>• Building maintenance and construction menu options can enable recipient companies to be directly involved in meeting the Requirement</li> <li>• Companies want guidance on decent work and how to reach equity-deserving communities</li> </ul>

Theme	Challenges	Opportunities
Operational efficiency	<ul style="list-style-type: none"> <li>• Administrative burden is high due to responsibility on TESS to match, propose activities on a continuous basis, and track outcomes</li> <li>• Communication and data management is a challenge due to lack of centralized tracking</li> </ul>	<ul style="list-style-type: none"> <li>• Companies (recipients and property users) indicated need for upfront planning and a desire to select a community partner organization with expertise suitable to the types of activities and opportunities available</li> </ul>
Governance structures	<ul style="list-style-type: none"> <li>• Compliance levels not defined</li> <li>• Lack of transparency on whether incentive is passed down to the property user</li> </ul>	<ul style="list-style-type: none"> <li>• Property users want a streamlined reporting system, more transparency and guidance</li> <li>• IMIT recipients want specific language to pass down to their tenants to meet the Requirement</li> </ul>

**Additional menu options (eligible activities) for companies to meet the Requirement** are detailed in Attachment 4 which explains the points-based system.

City Council specifically directed staff to include three areas of consideration when determining additional steps to be taken in reviewing the Requirement: Employment and training in building construction, a strategy to reduce precarious employment among building maintenance employees (including contract staff) and participation by users of IMIT properties in City-supported programs intended to connect job seekers to job opportunities. These areas were explored both through the background research and consultation process and addressed in the proposed points-based system.

The subsections below discuss the opportunities identified in each of the three areas of the Council direction through research and consultations.

***Opportunities in building construction***

The current labour shortage experienced in parts of the construction industry (which is expected to worsen over the medium to longer term) and low participation rates among equity deserving groups, point to potential opportunities in the construction industry that IMIT recipients could contribute to through the Requirement. This includes pre-apprenticeship training, registered apprenticeships, and hiring for professional, administrative and technical jobs during the construction phase.

Potential feasible menu options for companies include:

- Directly sponsoring or "buying seats" in pre-apprenticeship training programs for equity-deserving groups
- Social procurement of goods and services from Greater Toronto Area companies during the construction phase as identified through City-endorsed supplier councils
- For larger developments, customized support from the City's Construction Connections program may result in more activities to be included in a recipient's local employment plan addressing the construction period, such as supporting direct connections to contractors working on the development to consider hiring new apprentices from equity-deserving groups

### ***Opportunities to reduce precarious work among building maintenance workers***

Expert consultations identified key issues concerning precarious work in the building maintenance sector where too often there are persistently low wages driven by multiple subcontracting relationships, misclassification of employees as independent contractors, inappropriate use of temporary agency workers, and contract flipping which poses barriers to unionization. The City's Fair Wage Office provided guidance during the consultation process on the limitations of applying the City's Fair Wage Policy and Fair Wage rates.

Further details on issues identified contributing to precarious work can be found in Attachment 3, as well as potential contractual solutions proposed by stakeholders, for further consideration by the City.

### **Potentially feasible menu options for employment and training activities to help avoid precarious work in the building maintenance sector include:**

- IMIT recipients adopt wage standards in their building maintenance contracts that are similar to a living wage and provide self-audits on a regular basis
- IMIT recipients provide work placement opportunities for students enrolled in building maintenance programs

The following potential action to be undertaken by the City was identified as a way to contribute to a strategy to reduce precarious work. It is a complement to the IMIT employment requirement activities.

- City or City-endorsed partners to provide educational resources to IMIT recipients and industry associations (i.e. The Building Owner and Management Association) to assist companies to embed decent work policies into their supply chains

### ***Participation of property users in City-supported job programs***

IMIT property users are willing to support City-sponsored programs, and are receptive to an approach that offers a wider range of options and clear expectations for activity levels.

Transparency between the IMIT recipient and property user on transfer of the incentive and contribution to the local employment requirement is a key success factor. The City can facilitate this through publishing a clear process, and include a local employment plan in new financial incentive agreements.

### **Introducing a points-based system**

The recommendation to introduce a points-based activity tracking system responds to a need for flexibility and scalability that reflects the wide range of types of IMIT developments that range from small food manufacturing facilities, to film studios, to large corporate offices. A range of options was identified throughout the consultation process, with a focus on City-endorsed programs.

Values of points were determined through consultation with workforce development partners and City staff, with the most desirable activities being allocated higher points values to encourage uptake. The expected activity levels were validated through scenario analysis and consultations.

An overview of the system is provided in Attachment 4 and the key elements are:

- IMIT recipients are provided expected activity levels under the points-based system that correspond to the scale of the development (high eligible construction value developments have higher activity levels, lower eligible construction value developments have lower activity levels.)
- Points are accumulated by completing activities that support City-endorsed programs to promote local hiring and training. A detailed eligible activities list is provided to recipients.
- Expected activity level is measured at the building-level. An IMIT recipient is responsible for ensuring that the total number of points for the building is achieved, and may also contribute to earning points toward meeting the requirement.
- An IMIT recipient delivers annual reports to the City from aggregating property user activities and outcomes through a standard form.
- The incentive period begins when the first payment is made; however, IMIT recipients can begin to accrue points by completing activities at any time during the construction period.
- The in-force IMIT requirement is for a local employment plan and engagement with the City to promote local hiring and training. The City will work with current IMIT recipients and new applicants to encourage them to use the points-based system to develop the required local employment plan in support of City-endorsed programs.
- It is expected that applicants will agree to utilize the points-based system given that it provides better certainty and guidance for meeting the requirement.

- After the one-year pilot period staff will analyze the results and report to Council with a recommendation on the possibility of amending the CIP to make the requirement mandatory.

The table below provides a breakdown of the features of the points-based system and how it addresses challenges currently faced in implementing the Requirement.

## Challenges with Current Administration and Features of Points-Based System

Challenge with existing system	New system feature	Description
No specified activity levels and inconsistent engagement	Quantifiable	Current and future IMIT recipients will be expected to achieve a prescribed number of points corresponding to local hiring and training activities. This provides an objective measure for both the City and company. Interested applicants to the IMIT program will also be able to view the requirement and assess whether they are able to meet the requirement as part of the application process.
Not scalable for small vs. large developments	Scalable	Number of points required for compliance calculated based on the scale of the development. (e.g. IMIT recipients with development projects of lower construction value will need to attain fewer points to achieve compliance, while recipients with higher value construction projects are expected to attain more points).
Reporting cycle is rigid and does not account for business processes	Flexible	Companies will have a range of options to select from a menu, to build out employment plans that enable them to achieve compliance. Point targets will be determined for the life of the incentive, with recommended activity levels and carry-over permitted from year to year. (E.g. Points accrued in the construction period can be carried over to later years)
Activities not prioritized/valued	Impact-driven	Point valuation by the City is based on most desirable/high value activities for employment and training (E.g. instituting a living wage policy which extends to contractors and subcontractors, and supporting apprenticeships in the construction period).

Challenge with existing system	New system feature	Description
Intermediary (TESS) bears administrative burden	Relationship-based	A proposed list of partners supported by the City are presented to companies, who are then able to select their community-based partner(s) and develop relationships over the 10-year incentive period.
No reporting structure	Verifiable	The system places tracking and documentation responsibilities with the recipient. This allows administrators to easily view company activity levels and perform investigations/spot-checks as deemed necessary, or seek information from City-supported partners on company participation.

***Expected outcomes of implementing a points-based system***

By introducing a points-based system, the following outcomes are expected:

- Clarification of program requirements and improved compliance levels for current and future recipients
- Increase in hiring and training activities and outcomes for City-endorsed programs targeting to equity-deserving groups
- Reduction of administrative burden for City staff
- Formation of long-term relationships between community partners and companies
- Increased awareness of City policies/programs to support training and employment

***Procedures and tools for onboarding and compliance management***

Analysis of program efficiency and governance structures identified a number of improvement areas in the stages of the process from onboarding to reporting. While the points-based system addresses many challenge areas, additional actions are recommended to simplify program administration including:

- Development of standardized onboarding materials to be shared with recipients and passed down to property users.
- Initiation of a group of IMIT companies to share best practices in equitable hiring and workforce development participation
- Development of simplified online reporting forms that integrate with City information management systems to track activities and outcomes against local employment plans

## **Conclusion**

The research and consultation process determined the need for a more clear, objective, and IMIT recipient-led compliance requirement. It also identified that activities pertaining to building construction and precarious work in building maintenance will enable IMIT recipients to be directly involved in achieving compliance. Given the complexities of the new system, staff should undertake a review in consultation with all stakeholders after a full year of implementation (late 2020) with a detailed analysis of opportunities for further improvement in the next IMIT review (2022).

## **CONTACT**

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## **SIGNATURE**

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Mike Williams  
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## **ATTACHMENTS**

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Attachment 1: Summary of Findings from Background Research

Attachment 2: Issues Identified in Building Construction Consultations

Attachment 3: Options and Issues Identified in Consultations for Reducing Precarious Work Among Building Maintenance Employees and Contractors

Attachment 4: IMIT Local Employment Requirement Points-Based System