



GTSWCA
Greater Toronto Sewer & Watermain
Contractors Association



June 10, 2022

Sent via email to: mayor_tory@toronto.ca; councillor_ainslie@toronto.ca;
councillor_bailao@toronto.ca; councillor_crawford@toronto.ca; councillor_nunziata@toronto.ca;
councillor_pasternak@toronto.ca; councillor_thompson@toronto.ca

His Worship John Tory
Mayor, City of Toronto
Toronto City Hall
100 Queen Street West

Dear Mayor Tory,

Re: EX Recommendation #49 seeks to exempt Metrolinx from the City of Toronto's Fair Wage Policy

The GTSWCA and TARBA represent the most qualified companies in the sewer, watermain, and road construction sectors in Ontario. Our members build, supply, and service the municipal core infrastructure construction sector across the region. As a partner to the City of Toronto, we are writing to express our opposition to, and concern for, 2022.EX.33.1, Recommendation #49. Specifically:

49. City Council amend City of Toronto Municipal Code Chapter 67, Fair Wage, Schedule A – Fair Wage Policy, to exempt Metrolinx from the City's Fair Wage Policy requirements for the following three transit projects: the Subways Program, the Light Rail Transit Program, and the GO Expansion Program.

The GTSWCA has always been a strong supporter of the Fair Wage Policy and its continued application to all City contractors and subcontractors. Recommendation #49 seeks to exempt Metrolinx from the City of Toronto's Fair Wage Policy, which has been designed to ensure that contractors awarded contracts with the City of Toronto pay their workers "fair wages" for work performed and to ensure that workers are treated fairly in the workplace by setting standards that employers must meet.

More specifically, originally implemented in 1893, the Fair Wage Policy was developed to ensure all contractors for the City paid their workers the union rates or, for non-union workers, the prevailing wages and benefits in their field. Further, the expressed intent was to create a level playing field in competitions for City work, to protect the public and to enhance the reputation of the City for ethical and fair business dealings. Specifically, a recent Fair Wage Office Annual Report notes:

[The Fair Wage Policy] provides wage protection for workers engaged on City contracts. The competition for these contracts is significant and contractors and sub-contractors might be enticed to cut contract costs simply by cutting employee wages. In this competitive environment, it is important to ensure that workers are fairly treated and compensated.



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In addition to ensuring workers receive fair wage rates and labour conditions on City contracts, this Policy too protects contractors from unfair competition based on reduced labour costs when bidding on City contracts. That is, no contractor should be able to secure a competitive advantage by paying their employees substandard wages and avoiding investments in health and safety, skills training, among others.

In addition to the health and safety, and skills training concerns and competitive advantages where no Fair Wage Policy exists, there is a significant equity impact of a Fair Wage Policy that ought to be considered. That is, the implementation of the Fair Wage Policy advances the City's commitment to access, equity, and workers' rights by ensuring that workers on City contracts are paid a "fair wage" and are not subject to harassment or discrimination. Specifically, a recent Fair Wage Office Annual Report notes:

Through the implementation of this policy, workers become aware of their rights. This is particularly important to new immigrants and other vulnerable workers. The Fair Wage Office will increase awareness in the immigrant community by providing educational material in various languages about the City's Fair Wage Policy and complaint process. Through these efforts, workers and employers will be better informed about their rights and responsibilities.

Understanding the sensitivity of the concerns surrounding health and safety, equity impacts, and fair treatment of workers, it is particularly important the City reconsider Recommendation #49 to exempt Metrolinx from the City of Toronto's Fair Wage Policy. Not only does contemplating such exemption raise concerns of fairness, competition, commitments to health and safety, and equity impacts, but entirely undermines the City's reputation for ethical and fair business dealings and the advancements the City has made since the Policy's introduction in 1893.

The GTSWCA and TARBA have enjoyed a strong working relationship with the City, which has enabled us to work together in the past to solve a number of complex issues quickly and amicably. We urge the Committee to vote against 2002.EX.33.1, Recommendation #49 and ensure that Metrolinx, like all City contractors, must pay fair wages to workers on City of Toronto Projects. As always, we appreciate the City's consideration of our recommendation. We would welcome further discussion with you on how to move forward on this issue. Please do not hesitate to contact me (416-898-4744 or patrick.mcmanus@oswca.org).

Sincerely,

Patrick McManus
Executive Director, GTSWCA

Andy Manahan
Executive Director, TARBA