

SCHEDULE “A”

All employers of employees for whom the Labourers’ International Union of North America, Ontario Provincial District Council, and its affiliated Local Unions 183, 493, 506, 527, 607, 625, 837, 1036, 1059, 1081 and 1089 holds bargaining rights and who are engaged in the wrecking, demolition, dismantling, salvage, abatement or remediation of all manner and types of buildings, structures, equipment, soils, materials or things (and all work normally associated with or incidental thereto) in all sectors of the construction industry in the Province of Ontario save and except employers bound by the following collective agreements between:

- *Building Restorations and Associated Work Contractors and the Labourers’ Union of North America, Local 183*
- *Brook Restoration Ltd. and the Labourers’ International Union of North America, Ontario Provincial District Council and its affiliated Local Unions 183, 493, 506, 527, 607, 625, 837, 1036, 1059, and 1089*
- *Concrete Cutting & Drilling Association of Ontario and the Labourers’ International Union of North America, Ontario Provincial District Council and its affiliated Local Unions 183, 493, 506, 527, 607, 625, 837, 1036, 1059 and 1089*
- *Construction Labour Relations Association of Ontario; Ontario Masonry Contractors Association; Industrial Contractors Association of Canada; Waterproofing Contractors Association of Ontario; Cement Finishing Labour Relations Association and Labourers’ International Union of North America and the Labourers’ International Union of North America, Ontario Provincial District Council, On Behalf of its Affiliated Local Unions 183, 493, 506, 527, 607, 625, 837, 1036, 1059 and 1089*
- *Durham Residential Construction Labour Bureau and the Labourers’ Union of North America, Local 183*
- *Electrical Power Systems Construction Association and the Labourers’ International Union of North America, Ontario Provincial District Council and its affiliated Local Unions, 183, 493, 506, 527, 607, 625, 837, 1036, 1059 and 1089*
- *Masonry Contractors Association of Toronto Inc. and Masonry Council of Unions, Toronto & Vicinity*
- *Metropolitan Toronto Apartment Building Association and the Labourers’ Union of North America, Local 183*
- *Ontario Formwork Association and Formwork Council of Ontario*
- *Ontario Precast Concrete Manufacturers’ Association and the and Labourers’ International Union of North America and the Labourers’ International Union of*

North America, Ontario Provincial District Council, On Behalf of its Affiliated Local Unions 183, 493, 506, 527, 607, 625, 837, 1036, 1059 and 1089

- *Residential Floor Levelling Association and the Labourers' Union of North America, Local 183*
- *Residential Framing Contractors Association of Metropolitan Toronto and Vicinity and the Labourers' Union of North America, Local 183*
- *Residential Low-Rise Forming Contractors Association and the Labourers' Union of North America, Local 183*
- *Residential Tile Contractors Association and the Labourers' Union of North America, Local 183*
- *The Central Southwest Ontario Heavy Civil Construction Association and the Tri-Local Heavy Civil Construction Council and its affiliates, Labourers' International Union of North America, Locals 183, 837 and 1059*
- *The Greater Toronto Railing Association and Labourers' International Union of North America, Local 183*
- *The Greater Toronto Sewer and Watermain Contractors' Association and A Council of Trade Unions Acting as the Representative and Agent of Teamsters' Local Union 230 and Labourers' International Union of North America, Local 183*
- *The Heavy Construction Association of Toronto and Labourers' International Union of North America, Local 183*
- *The Heavy Construction Association of Windsor and Labourers' International Union of North America, Ontario Provincial District Council, Local 625*
- *The Independent Unionized Landscape Contractors' Association and Labourers' International Union of North America, Local 183*
- *The National Capital Road Builders Association and A Council of Labour Unions representing International Union of Operating Engineers, Local 793, Labourers' International Union of North America, Local 527 and Teamsters Local Union 91 Affiliated with the International Brotherhood of Teamsters*
- *The Ontario Railroad Contractors Association and the Labourers International Union of North America, Ontario Provincial District Council on behalf of Local Unions 183, 493, 506, 527, 607, 625, 837, 1036, 1059, and 1089*
- *The Ontario Concrete and Drain Contractors Association and Labourers' International Union of North America, Local 183*
- *The Provincial Civil Agreement between Labourers' International Union of North America, Ontario Provincial District Council and its affiliated Local Unions 183, 493, 527, 607, 625, 837, 1036, 1059 and 1089, and various Signatory Employers*

- *The Residential Hardwood and Carpet Association and Labourers' International Union of North America, Local 183*
- *The Roads and Heavy Construction Agreement between Green Infrastructure Partners (GIP) and Labourers' International Union of North America, Local 183*
- *The Sewer and Watermain Agreement between Taggart Construction Limited and Labourers' International Union of North America, Local 183*
- *The Utility Contractors' Association of Ontario and The Labourers' International Union of North America, Ontario Provincial District and its affiliated Local Unions, 183, 493, 527, 607, 625, 837, 1036, 1059 and 1089*
- *Toronto and Area Road Builders' Association and A Council of Trade Unions Acting as the Representative and Agent of Teamsters' Local 230 and Labourers' International Union of North America, Local 183*
- *Toronto Residential Construction Labour Bureau and the Labourers' Union of North America, Local 183*

SCHEDULE “B”

INTRODUCTION

1. The Responding Party, Labourers’ International Union of North America, Ontario Provincial Council and its affiliated Local Unions 183, 493, 506, 527, 607, 625, 837, 1036, 1059 and 1089 (“LIUNA”) submits that the employer unit set out in its Schedule “A” is appropriate for accreditation.
2. The Schedule “A” employer unit mirrors the initial portion of the Applicant’s proposed unit:

All employers of employees for whom the Labourers’ International Union of North America, Ontario Provincial District Council, and its affiliated Local Unions 183, 493, 506, 527, 607, 625, 837, 1036, 1059, 1081 and 1089 holds bargaining rights and who are engaged in the wrecking, demolition, dismantling, salvage, abatement or remediation of all manner and types of buildings, structures, equipment, soils, materials or things (and all work normally associated with or incidental thereto) in all sectors of the construction industry in the Province of Ontario save and except employers bound by the following collective agreements between:

3. LIUNA agrees with all of the collective agreement exclusions submitted by the Applicant (with a correction to the spelling of the Taggart agreement).
4. LIUNA’s proposed employer unit includes the following five (5) additional collective agreements which LIUNA submits should also be excluded from any accreditation order:
 - a. *Brook Restoration Ltd. and the Labourers’ International Union of North America, Ontario Provincial District Council and its affiliated Local Unions 183, 493, 506, 527, 607, 625, 837, 1036, 1059, and 1089*
 - b. *The Independent Unionized Landscape Contractors’ Association and Labourers’ International Union of North America, Local 183*

- c. *The Greater Toronto Railing Association and Labourers' International Union of North America, Local 183*
- d. *The Ontario Railroad Contractors Association and the Labourers International Union of North America, Ontario Provincial District Council on behalf of Local Unions 183, 493, 506, 527, 607, 625, 837, 1036, 1059, and 1089*
- e. *The Residential Hardwood and Carpet Association and Labourers' International Union of North America, Local 183*

APPROPRIATE EMPLOYER UNIT

- 5. The proposed employer unit set out in Schedule "A" is appropriate for accreditation under section 135 of the *Act*.
- 6. The unit proposed by LIUNA covers speciality construction work performed by speciality demolition subcontractors across multiple sectors on a province-wide basis. The language mirrors that of LIUNA's collective agreement (the "Demolition Agreement") with the Ontario Association of Demolition Contractors Inc. (the "OADC"). This is a mature and well-established bargaining relationship that has been in existence for decades without any significant labour relations problems.
- 7. LIUNA's bargaining relationship with OADC dates to the 1970s when the union organized a group of Toronto-based specialty demolition contractors. This group evolved into the Metropolitan Toronto House Wreckers Association, later renamed the Metropolitan Toronto Demolition Contractors Inc. and ultimately the OADC.
- 8. From its inception, the Demolition Agreement covered all employees engaged in demolition work across all sectors of the construction industry in the Province of Ontario. This allowed LIUNA members to develop specialized expertise in all aspects of demolition work.

9. In 1983, the Minister of Labour recognized the distinct patterns of bargaining in the demolition industry by amending LIUNA's general ICI designation to exclude the relationship between the Labourers and the Metropolitan Toronto House Wreckers Association [**TAB 1:** Labourers' ICI Designation dated September 30, 1983].
10. In 1986, the Minister of Labour issued a new designation to LIUNA as the employee bargaining agency to represent construction labourers engaged in wrecking, demolition, dismantling or salvage of buildings and structures in the ICI sector. [**TAB 2:** Demolition Designations dated January 23, 1986, amended April 18, 1986].
11. A corresponding designation was issued to the then-named Metropolitan Toronto Demolition Association Inc. as employer bargaining agency for all employers engaged in the wrecking demolition, dismantling or salvage of buildings and structures whose employers are represented by LIUNA [**TAB 3:** OADC Designation dated January 23, 1986, amended April 18, 1986, revoked and replaced March 29, 2008]
12. LIUNA has bargained with the employers listed on Schedule "C" for decades on a group basis for a unit of employees that corresponds to LIUNA's proposed employer unit. The most recently expired collective agreement between LIUNA and the Association is effective May 1, 2022, to April 30, 2025 ("Demolition Agreement"). [**TAB 4**] A renewal of Demolition Agreement has been negotiated, and a final printed version is being finalized by the parties with an effective date of May 1, 2025, to April 30, 2028.
13. The exclusions submitted by the Applicant and LIUNA are necessary to ensure that the accreditation order does not apply to contractors bound to and performing work under one of LIUNA's other designations in the Industrial, Commercial and Institutional ("ICI") sector of the construction industry, an accredited collective agreement or any other collective agreement in the various sectors where miscellaneous demolition work may be performed. Many of these collective

agreements allow contractors to subcontract demolition work to a contractor bound to Demolition Agreement.

CONCLUSION

14. The proposed employer unit is well-established and has led to no significant labour relations problems. LIUNA requests that the Board find that it is appropriate.
15. The employers that LIUNA states are in the proposed employer unit and that had employees working the in the bargaining unit in the year immediately preceding the Application is provided in the List of Employers attached as Schedule "C".
16. If the Applicant meets the double majority required under section 136 of the *Labour Relations Act*, 1995 ("Act"), LIUNA submits that the Application should be granted.

ALL OF WHICH IS RESPECTFULLY SUBMITTED