

March 23, 2026

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EMAIL and E-FILE

Toronto Office

Ms. Catherine Gilbert
Registrar
Ontario Labour Relations Board
505 University Avenue, 2nd Floor
Toronto, ON M5G 2P1

Dear Ms. Gilbert:

**Re: Ontario Association of Demolition Contractors (“Applicant”) and The Labourers’ International Union of North America, Ontario Provincial District Council and its affiliated Local Unions 183, 493, 506, 607, 625, 837, 1036, 1059 and 1089 (“Responding Party”) and International Union of Operating Engineers, Local 793 (“Intervenor”)
OLRB File No. 1323-25-R**

As the Board is aware, we are retained by the Ontario Association of Demolition Contractors to represent them in the above referenced matter.

We have reviewed the file and are writing to request the Board to amend the bargaining unit for which the Applicant is seeking accreditation. Considering the Applicant is designated within the ICI sector and has been for over 40 years, we submit it is not necessary to include the ICI sector of the construction industry as a part of the bargaining unit the Applicant is seeking the Board to accredit.

As such, we request the Board amend the bargaining and utilize the bargaining unit described in the attached Schedule “A”. The Responding Party will further revise the Schedule “B” as necessary and provide this to the Board as soon as possible.

We look forward to hearing from the board and as indicated we will make the necessary filings in order to support the amended bargaining unit .

Thank you for your attention to this request and please do not hesitate to contact me should you have any questions.

Yours truly,
Mathews, Dinsdale & Clark LLP



Christopher F. Fiore
CFF:kt
Attachment

cc: Yu-Sung Soh and Saranjit Singh Cheema, *LIUNA*
Client

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 the industrial, commercial and institutional sector and 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*
- *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 1831*

- *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 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 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 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 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 Taggard 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*