



# City of Richmond

## Report to Committee

**To:** General Purposes Committee  
**From:** Serena Lusk  
General Manager, Community Services  
**Re:** **Mask Wearing in City Buildings**

**Date:** September 27, 2020  
**File:** 09-5125-01/2020-Vol  
01

### Staff Recommendation

That the wearing of masks in City buildings be required as described in Option 3 in the staff report titled, "Mask Wearing in City Buildings," dated September 27, 2020 from the General Manager, Community Services.

Serena Lusk  
General Manager, Community Services  
(604-233-3344)

Att. 2

| REPORT CONCURRENCE  |
|---------------------|
| APPROVED BY CAO<br> |

## **Staff Report**

### **Origin**

At the General Purposes Committee on September 8, 2020, Committee made the following referral:

*That staff review the development of a mask policy for all City buildings, and report back.*

The purpose of this report is to respond to the above referral.

This report supports Council's Strategic Plan 2018-2022 Strategy #1 A Safe and Resilient City:

*Enhance and protect the safety and well-being of Richmond.*

*1.4 Foster a safe, caring and resilient environment.*

This report supports Council's Strategic Plan 2018-2022 Strategy #3 One Community Together:

*3.1 Foster community resiliency, neighbourhood identity, sense of belonging, and intercultural harmony.*

### **Analysis**

In response to the COVID-19 Pandemic, Richmond implemented a number of measures to keep the community safe, including closing City buildings and introducing various safety measures. Up until now, the wearing of masks has been optional. The following report provides information in support of Council's interest in adopting a formal mask wearing policy for city buildings during the Pandemic.

### **Expert Advice**

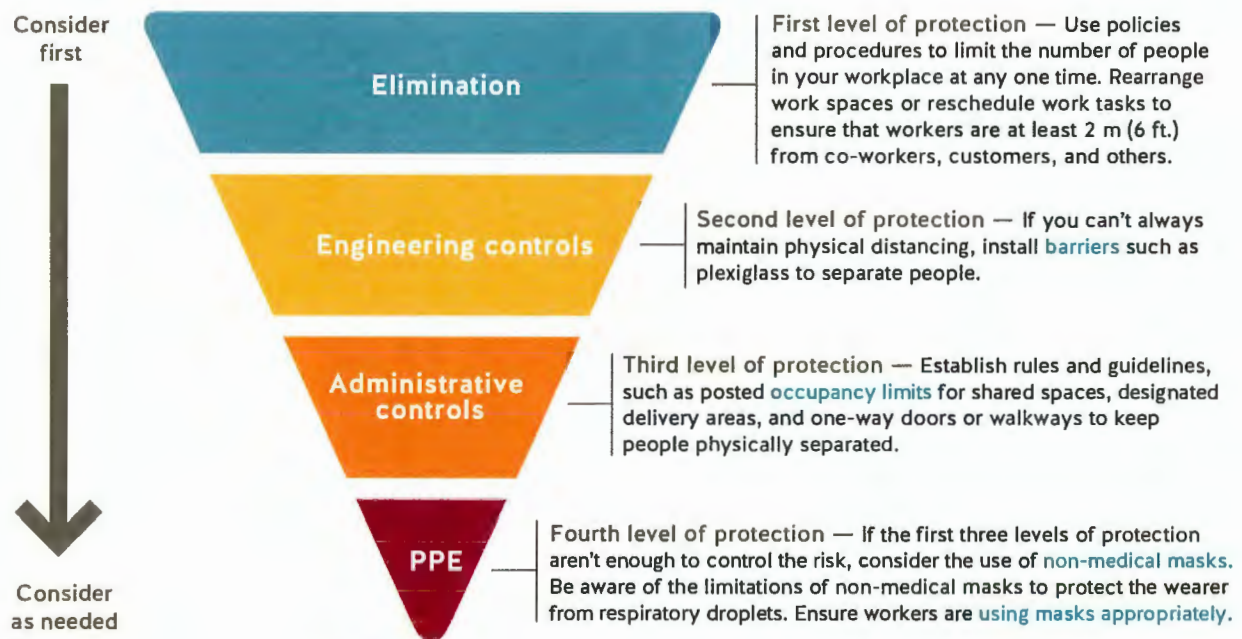
Guidance from the World Health Organization, BC Centre for Disease Control (BC CDC) and Vancouver Coastal Health is consistent in identifying the most effective ways to prevent the spread of COVID-19: frequent handwashing; maintaining physical distancing; and staying home when sick. Each of these authorities recommend that masks should be used as part of a comprehensive strategy to suppress transmission of COVID-19.

Specifically, masks should be used as an additional control measure if:

- A person is sick;
- A person is caring for someone who is or may be sick;
- Physical distancing is not possible; or
- Individuals are in close, prolonged contact with others.

The Medical Health Officer for Richmond, Dr. Meena Dawar, has also provided her advice in a letter included as Attachment 2 to this report.

The Occupational Health and Safety Regulation (WorkSafeBC) requires the City to implement infectious disease controls in the following order of preference (Hierarchy of Controls):



When the first three levels of protection are not enough to mitigate the risk, the need for Personal Protective Equipment (PPE), including non-medical masks as appropriate, will be assessed and assigned as required. Some staff may not be able to avoid contact with the public from time to time, or individually elect to take extra measures for their personal comfort. PPE, including non-medical masks, will be supplied by the City.

#### Current practice – Employee Mask Use

To date, the City of Richmond has taken a permissive approach to mask wearing in City buildings. Staff providing customer service to the public are given the option to wear a non-medical mask where engineering controls are in place and physical distancing can easily be maintained. A mask is required for staff and in limited situations, members of the public, only if other controls are not in place. Examples illustrating the City's current mask requirements are included in Table 1 below.

**Table 1: Mask use in City Buildings – Current Practice**

| <b>City of Richmond facilities</b>  | <b>Situations requiring staff to wear masks and rationale</b>  | <b>Situations requiring the public to wear masks</b>   |
|---|--|--|
| Fitness centres at Minoru Centre for Active Living and community centres                        | Fitness attendants are required to wear masks  | If distancing cannot be maintained, the use of non-medical face masks must be used by both patrons and staff.  |
| Transportation in City vehicles e.g. parking enforcement, animal control, community ambassadors | Limit to one person per vehicle wherever operationally possible. When not operationally possible, follow: <ul style="list-style-type: none"> <li>• PPE: Wear a disposable non-medical or cloth mask when there is more than one person in the vehicle</li> </ul> | n/a  |
| Inspectors – Building Approvals, Bylaws   | Inspectors are required to wear PPE (including masks) at all times when doing a site visit to a home/building  | Home owners/permit holders are advised during appointment booking that they must wear a mask during an inspection. An inspector may cancel/reject the on-site inspection if appropriate controls (distancing, masks) are not followed. |
| First Aid response  | Attendants to follow OFAA protocols, including wearing appropriate PPE (including appropriate style of mask) if providing direct patient care or within 2m (6 ft) of patient   |  |

The Administration is currently implementing a more restrictive approach to mask wearing for City employees including the requirement that they be worn in all cases where there will or may be interaction with another employee or member of the public in areas such as hallways, washrooms, elevators, and shared workspaces. Staff will be issued re-useable masks and provided appropriate training.

It should be noted that this increased requirement for mask wearing by City staff will not replace the need to follow the hierarchy of controls including maintaining physical distance. For the City's approach, this includes staff working remotely where possible and effective and carefully considering the need to re-open any City buildings including Richmond City Hall.

*Practices in other Jurisdictions*

Many jurisdictions across Canada, and a number of agencies serving the public in British Columbia such as TransLink and BC Ferries, and many local businesses, have implemented mandatory face mask requirements for the public in indoor public spaces.

A scan of Lower Mainland municipalities suggests that a number of other municipalities are also considering the development of a mask requirement for visitors to municipal facilities. Delta has recently announced the requirement for mandatory facemasks to be worn by anyone entering, exiting or moving around City of Delta facilities

Increasing numbers of Canadian municipalities outside of BC have developed policies or implemented bylaws requiring the use of masks including Calgary, Edmonton and Toronto.

It appears that there are a range of factors that have led others to consider and implement more restrictive mask policies. These factors can be summarized as follows:

- Desire for enhanced protection from an anticipated second wave of COVID-19;
- Re-opening access to City buildings for additional staff and the public;
- Perception that the ability to maintain 6 ft physical distancing in indoor public spaces is inconsistent and unpredictable;
- An increase in regional COVID-19 cases; and
- Guidance from Provincial Health Office.

A review of other mask use policies highlights a spectrum of potential policy approaches to the use of masks in City buildings. Within each of those approaches, a range of tools have been utilized to identify and communicate when, where and how masks should/must be used and if/how these requirements are enforced. These are illustrated in the graphic below. Attachment 1 offers an enlarged version of this graphic.



Illustration 1: Spectrum of Mask Use Requirements in City Buildings**SPECTRUM OF MASK USE REQUIREMENTS IN CITY BUILDINGS**Considerations for a more restrictive mask policy in City buildings*Cost implications and supply of masks*

The City of Richmond's current practice is for employees whose job function requires the use of a mask according to the Hierarchy of Controls identified in the Pandemic Exposure Control Plan to be provided with an appropriate style of mask at the City's cost.

Should Council provide the direction to implement a more restrictive mask requirement for members of the public using City buildings, it is best practice to request they provide their own mask but supply a disposable mask if needed.

The City currently has a stock of disposable masks that can accommodate this approach at this stage of the Restoring Richmond Plan. Should further facilities open or participation increase, the cost and supply availability may need to be further considered.

*Education and training*

Should Council provide the direction to implement a more restrictive mask requirement for members of the public using City buildings, a communication plan will be developed, with additional signage produced at all City facilities, outlining requirements for mask use and guidelines for proper use and disposal of a facemask.

### *Exemptions*

A common feature of even the most restrictive mask policies or bylaws implemented by other public serving agencies or jurisdictions, includes exemptions where mask use is not feasible or recommended. Many of these exemptions involve considerations for people with disabilities, considerations around age, activity level of participants, and considerations relative to indoor and outdoor spaces.

### *Considerations for people with disabilities*

- A common practice is to consider an exemption for anyone with an underlying medical condition or disability which inhibits the ability to wear a mask or face covering; this would include:
  - Individuals with disabilities for whom it is difficult or impossible to wear a mask, such as:
    - Individuals with sensory disabilities (e.g. persons living on the autism spectrum);
    - Individuals with chronic health conditions that are respiratory in nature (COPD, asthma);
    - Individuals with cognitive disabilities (e.g. dementia); and
    - Individuals with physical disabilities who are not able to put on / take off a mask.
  - Individuals who are deaf or hard of hearing who may face increased communication challenges including:
    - Putting the elastic around their ears affects the volume or causes the hearing aids to come out;
    - Individuals who rely on lip reading are unable to communicate in this manner; and
    - Individuals with auditory processing challenges find it can be more challenging to hear/understand.
- There has also been challenges within the disability community where individuals with disabilities who are unable to wear masks have been excluded from certain spaces/ businesses as there have been no accommodations in place to support them, and even with accommodations in place members of the community have been stigmatized for not wearing one. Considerations would need to be made to address this issue.

### *Age*

A common practice in more restrictive mask use policies is the inclusion of an exemption related to age, and particularly related to children. It appears that there is a range of perspectives regarding the appropriate age for children to be required to wear a mask. The BC Centre for Disease Control recommends not putting a face mask or any covering including visors and eye protection on infants under two (2) years of age. A facemask or covering will make it difficult for a baby to breathe because their airways are still small. There is also a risk that parts of the facemask, visor or eye protection can come off and become a choking hazard. The World Health Organization suggests that children over five (5) years should be required to wear masks, considering childhood developmental milestones, compliance challenges and the autonomy required to use a mask properly. The BC Ministry of Education has mandated masks for all staff,

middle and secondary students in common areas where physical distancing cannot be maintained.

Any more restrictive mask use requirements for City buildings will need to consider exceptions based on age.

#### *Activity levels*

Any more restrictive mask use requirements will need to consider exceptions for individuals participating in physical activity. Examples include water activities (e.g. swimming, aquatic fitness activities) and physical activities that cause significant sweating. According to the World Health Organization, people should not wear masks when exercising as masks may reduce the ability to breathe comfortably. Sweat can also make a mask become wet more quickly, making it more difficult to breathe, reducing the masks effectiveness and promoting the growth of microorganisms.

However, it is common practice in more restrictive mask use policies to require any person entering, exiting or moving around a building while not actively participating in strenuous or vigorous activity to wear a mask.

#### *Indoor/Outdoor*

According to health authorities, transmission of COVID-19 is much more likely when in close contact in an indoor setting. Transmission is less likely in an outdoor setting where there is more space for people to keep physically distanced. As such, many of the mask policies reviewed to date apply to indoor and enclosed spaces only.

However, evolving guidance from health authorities across Canada, including the Public Health Agency of Canada, recommend wearing a non-medical mask in closed spaces and close contact situations when distancing is difficult, whether indoor or outdoor.

A more restrictive mask policy for City buildings could include masking requirements in adjacent outdoor spaces where physical distancing is inconsistent or unpredictable.

#### *Enforcement*

One of the key differentiators along the spectrum of mask use requirements is the method of enforcement undertaken for non-compliance. On the permissive end of the spectrum, enforcement is focused on targeted education and communication with staff and only those members of the public who are directly impacted by the requirement.

Moving further along the spectrum into more restrictive requirements for mask use, the need for more broad education and communication increases. Public facing education and communication tools to educate the public on mask use requirements could include: signage at entrances to City buildings; public corporate statements on the required use of masks; updates on the City website, social media channels and other digital communication tools; and the availability of disposable masks to members of the public on request in all City buildings to reduce barriers to compliance.



Considering more extreme enforcement options, such as refusal of service and implementing a process for issuing monetary penalties and/or fines would need to be considered carefully and include input from a range of stakeholders.

#### Support for a mask policy for City buildings

There appears to be a significant level of support, both in the Richmond community, and with City staff, for the consideration of a more restrictive mask use requirement for City buildings.

#### *Trends in public sentiment*

Anecdotal comments from patrons at community facilities where services are being restored suggest that there is some apprehension about the risks of transmission of COVID-19 in indoor spaces.

A scan of social media comments responding to local announcements of actions taken to mitigate COVID-19 in Richmond and surrounding communities have been predominantly in favour or increased use of masks in public spaces. An example of this is the overwhelmingly supportive comments on Delta's FaceBook posts announcing their decision to require masks.

While the Richmond Chamber of Commerce has not surveyed local businesses specifically regarding mask use, there is a perception that there is a prevalence of mask use by both staff and patrons of businesses in Richmond.

Nationally, a recent online survey by Leger and the Association for Canadian Studies found that 83 per cent of respondents feel governments should order people to wear a mask in all indoor public spaces.

#### Options for Consideration

The implementation of any of the options below will not change the need for continued vigilance in other areas including the elimination of risk through modified work schedules and physical distancing, engineering controls and administrative controls. The requirement for masks is meant as an additional layer of protection rather than an alternative to those protections already in place.

Further, senior staff, under the direction of the Chief Administrative Officer, continue to monitor trends in health outcomes in the city and regionally in implementing the Restoring Richmond Plan. The addition of a requirement for mask use in city buildings will not impact the potential that services may need to be reduced or facilities closed in response to increasing negative health outcomes related to the Pandemic.

#### **Option 1 – Permissive Mask Use Requirements**

Next steps: None.

**Option 2 – Specific Recommendation on Mask Use**

Next steps: Should Council recommend this option, staff would implement and communicate a mask use requirement that encourages an expanded use of masks for staff and the public in City buildings, with a focus on education and communication.

**Option 3 – Semi-Restrictive Mask Use Requirements (RECOMMENDED)**

Next steps: Should Council recommend this option, staff would implement and communicate requirements for mask wearing that mandates required use indoors in City buildings, with a focus on education and communication. Exceptions will be identified for those with disabilities, those under five (5) years of age, and those engaged in vigorous physical activity. Refusal of service for non-compliance is recommended for those who do not fall into these categories.

**Option 4 – Restrictive Mask Use Requirement**

Action required: As jurisdiction in BC for health matters lies with the Province, should Council direct staff to investigate implementation of a bylaw requiring mask use in all public spaces, staff would advocate to the Province for direction on implementing a bylaw requiring mask use in all public spaces.

**Financial Impact**

None. Cost implications of the recommended option can be accommodated within existing budgets.

**Conclusion**

While the implementation of a mandatory mask policy is not formally recommended by agencies such as the World Health Organization, WorkSafe BC or Vancouver Coastal Health, a clearly communicated guideline on the City's position on mask use in facilities will ensure that expectations for staff and members of the public entering City buildings is clear and well-understood. A review of other jurisdictions, public sentiment and an increase in COVID-19 cases regionally support a recommendation to draft and communicate a more restrictive mask use requirement in City buildings.



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Att. 1: Spectrum of Mask Use Requirements in City Buildings

Att. 2: Letter from Vancouver Coastal Health

# SPECTRUM OF MASK USE REQUIREMENTS IN CITY BUILDINGS



## PERMISSIVE

- Required whenever physical distance of 6ft cannot be maintained from another person
- Optional where barriers or other forms of control allow for distancing

### ENFORCEMENT

- Education and communication

### TOOLS

- Exposure Control Plan
- Site Specific Safety Plans
- Employee Mask Use Guidelines
- Targeted Messaging to Impacted Patrons

## SPECIFIC RECOMMENDATION

- Required whenever physical distance of 6ft cannot be maintained from another person
- Encouraged even where barriers or other forms of controls allow for distancing

### ENFORCEMENT

- Education and communication

### TOOLS

- Exposure Control Plans
- Site Specific Safety Plans
- Employee Mask Use Requirements
- Public Mask Use Requirement Communications/Signage

## SEMI-RESTRICTIVE

- Mandatory in all civic facilities

### ENFORCEMENT

- Education and communication
- Refusal of Service

### TOOLS

- Exposure Control Plans
- Site Specific Safety Plans
- Employee Mask Use Requirements
- Public Mask Use Requirement Communications/Signage

## RESTRICTIVE

- Mandatory in all indoor/enclosed public spaces and outdoor gathering spaces

### ENFORCEMENT

- Ticket: Monetary penalty/fine
- Education and communication

### TOOLS

- Exposure Control Plans
- Site Specific Safety Plans
- Employee Mask Use Requirements
- Public Mask Use Bylaw

**FACTORS FOR CONSIDERATION: Cost, Training, Staff Resources, Scope (Indoor/Outdoor), Best Practices, Age, People with Disabilities, and Activity Level**

**Factors leading to RESTRICTIVE APPROACH: protection from a second wave, reopening access to public, 6ft distancing in indoor spaces is inconsistent and unpredictable, increasing regional COVID cases, PHO guidance**

2 October 2020

Ms. Serena Lusk  
General Manager, Community Services  
City of Richmond  
6911 No. 3 Road  
Richmond, B.C.  
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Dear Ms. Lusk,

Re: Mask Policy for City of Richmond Buildings

Thank you for seeking my input as you explore options to enhance safety of City of Richmond (the City) staff and Richmond residents who attend City buildings. First, I want to acknowledge and thank the administration's attention to COVID-19 safety as demonstrated in the thoughtful [Restoring Richmond](#) plan and detailed scrutiny to [COVID-19 safety](#) for all City operated premises. These plans have already implemented the most effective COVID-19 precautions: screening of staff and clients, physical distancing with limitations to numbers of visitors so distancing can be maintained, engineering controls where applicable, enhanced cleaning, and attention to hand hygiene. I want to assure you that these protocols already assure maximum safety of your staff and clients.

Non-medical masks do enjoy a broad level of support in public polls and are used by many City residents. The question you are facing is whether there is justification to require all healthy staff and clients to wear a non-medical face mask while on City premises. The policy direction of Canadian public health jurisdictions has remained consistent: medical masks should be reserved for health care settings, with non-medical face masks are recommended to be worn by people who are symptomatic and those caring for them.

Nationally, Canadians have also been *advised* to wear face coverings when in the community and it is not possible to maintain a 2-meter distance from others, particularly in a crowded setting, and *when local epidemiology and rate of community transmission warrant it*.<sup>1</sup> Non-medical masks have been described to perform the same function as covering of face with a tissue or sleeve when coughing or sneezing. The BC Centre for Disease Control and Provincial Health Officer encourage mask use "as a matter of personal

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<sup>1</sup>Regulatory considerations on the classification of non-medical masks or face coverings: Notice to industry, Health Canada, accessed at <https://www.canada.ca/en/health-canada/services/drugs-health-products/covid19-industry/medical-devices/personal-protective-equipment/medical-masks-respirators/face-covering-classifications-notice.html>

choice” and in situations where safe distance cannot be maintained.<sup>2 3</sup> There is no interest in BC to pursue a mandatory mask policy; nor is there any compelling reason to do so.

In Vancouver Coastal Health, there is no public health order requiring people to wear masks in public spaces. Despite the recent increase in cases of COVID-19, the overall rates in the population are low, including in Richmond, when compared to other jurisdictions in Canada and abroad, and thus our local situation does not warrant such an order. The City is likely aware of a few local governments in Ontario that have recently implemented mask requirements; these were brought in at the recommendation of local public health and in context of their local COVID-19 transmission risks.

In the hierarchy of measures public health has recommended to prevent transmission since the beginning of the pandemic, non-medical mask wearing is one of the lowest, and should never replace more effective measures i.e. staying home, particularly if feeling unwell, limiting social interaction, especially outside your own family or immediate social contacts, and keeping physically distanced when interacting with strangers, etc. These are actions that all people in Richmond can and should take that do not require buying masks or other face coverings which may create additional financial costs for already stretched households. In addition, masks cannot be tolerated by people with certain medical conditions. As such, a mandatory masking requirement risks creating potential barriers and risks for vulnerable people in communities, such as a lack of access to essential services and the experience of further stigmatization and marginalization, if they are unable to afford such items or unable to wear them.

Given the excellent safety plans in place for all City premises, there is little justification for a mandatory mask policy and I recommend that it not be pursued. The city should continue to implement its COVID-19 safety plans with full assurance that it is serving its citizens well within the context of national, provincial and local public health guidance.

Sincerely,



Dr. Meena Dawar

Medical Health Officer- Richmond

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<sup>2</sup> <http://www.bccdc.ca/health-info/diseases-conditions/covid-19/prevention-risks/masks>

<sup>3</sup> Non-medical cloth masks are your choice during COVID-19, Dr. Bonnie Henry, Ministry of Health  
<https://news.gov.bc.ca/factsheets/non-medical-cloth-masks-are-your-choice-during-covid-19>