

B.C. TEMPORARY FOREIGN AGRICULTURE WORKER HOUSING INSPECTION PRE-SEASON HOUSING GUIDE

August 2018

(version 3-5)

This document is to assist housing inspectors in assessing the suitability of housing intended for temporary agriculture farm workers (TFW) in BC.

These guidelines are to be referred to while completing the <u>B.C. INSPECTION FORM AND REPORT of</u> <u>HOUSING for Temporary or Seasonal Foreign Worker Programs</u> (the housing inspection report used by Service Canada for temporary foreign agriculture workers in B.C.).

Refer to the Government of Canada website for additional program information <u>https://www.canada.ca/en/employment-social-development/services/foreign-</u>workers/agricultural.html.

For specific housing and safety requirements refer to the BC Building Code, the BC Fire Code (<u>https://www2.gov.bc.ca/gov/content/industry/construction-industry/building-codes-standards/the-codes</u>), local government building department or local fire department.

Additional guidance documents <u>may</u> be prepared to clarify requirements. These documents will be posted on the Western Agriculture Labour Initiative ("WALI") website <u>https://walicanada.ca/</u>.

Please email <u>info@walicanada.ca</u> with any questions or suggestions for improving the inspection process, forms or guideline document.

Reminder to both inspectors and employers that the BC Ministry of Health is currently reviewing the regulations relating to worker housing. We expected new regulations in the next few years.

This inspection is designed to assist in meeting temporary foreign agriculture worker (TFW) program housing requirements and does not replace or ensure that all legislative or regulatory requirements have been met.

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I. Background

1. Definitions / General Comments

- 1. BC Inspection Form and Report of Housing (BCIF) The inspection form used to assess housing for Temporary Foreign Agriculture Workers (TFW) on BC farms.
- 2. Through the annual negotiations with the foreign governments participating in TFW programs, changes to the housing guidelines may be made. While attempts are made to allow employers time to incorporate the changes, there is no guarantee that structures will be grandfathered (i.e. employers may be required to make changes to previously approved structures).
- 3. In several parts of this document the B.C. Industrial Camp Regulations (ICR) is referred to. The ICR may vary somewhat from the TFW guidelines, but it provides additional direction or clarification for provincial requirements.

2. Responsibilities

- 1. The purpose of this process is to provide safe and sanitary conditions for TFWs.
- An inspection of a facility by a temporary foreign worker housing inspector does not remove an employer's responsibility to meet all regulatory requirements. Regulatory authority remains with the appropriate agency. <u>Passing a housing inspection, does not in any way confer or imply that all legal obligations of the employer have been met.</u>
- 3. The employer is responsible to ensure that the accommodation meets the standards **throughout the season** and that any deficiencies are fixed as soon as possible.
- Inspectors are to provide an independent and knowledgeable observation of the housing conditions, on a specific date; explicitly addressing the items detailed on the inspection form. Inspectors are NOT certifying that the housing conditions meet any regulatory standards.
- 5. Inspectors are expected to use professional judgment. There are specific requirements, but a number of subjective evaluations must be made. Inspectors are expected to have a basic understanding of TFW program housing requirements and local residential building practices.
- 6. Inspectors will note any obvious health or safety violations that could harm workers, even if the issue is not a specified item on the BCIF. The severity of a threat is a subjective assessment by the inspectors who are likely not worker health and safety professionals:
 - a. For serious and immediate threats such as but is not limited to, faulty wiring that could result in a fire or electrocution, lack of railings on a second story balcony:
 - i. The inspection should fail,
 - ii. The inspection report should be flagged as a problem and immediately forwarded to the WALI office, and
 - iii. Be referred to the appropriate regulatory body (e.g. local Heath Authority, Fire Chief, or local building inspector).
 - b. For less serious situations, such as an uneven sidewalk, the inspector may make a recommendation to have the situation fixed prior to the next inspection.
- 7. If an inspector believes that an employer is providing false or misleading information they should:
 - a. Refuse to complete the inspection or fail the inspection, and
 - b. Notify the WALI office. WALI will then work with employers and governments to ensure program requirements are met.

3. Inspection process

- 1. Inspections must be completed by BC Home Inspectors certified by and be in good standing with the province of BC (Consumer Protection BC).
- 2. Inspectors (the actual individual physically inspecting the premises) must be registered with the Western Agriculture Labour Initiative (WALI) or it's designate.
 - a. WALI will attempt to maintain a number of inspectors throughout the province in areas where potential employers operate.
 - b. The list of registered inspectors will be made public.
 - c. For administrative efficiency and quality control, WALI may choose to limit the number of registered inspectors in an area and the number of inspections completed by an individual inspector.
 - d. WALI is under no obligation to add or keep inspectors on the registered list.
 - e. Inspectors, in the opinion of WALI or appropriate government agencies, determined not to be providing a service in the spirit of the TFW programs will be removed from the registered list.
- 3. The cost/fee for an inspection will be negotiated between the inspector and the employer. The cost will depend on:
 - a. Location of the property and the distance the inspector is required to travel,
 - b. The complexity of the inspection (size, number of buildings),
 - c. Condition of the facilities, and
 - d. Time frame in which the inspection needs to be completed.
- 4. Inspection forms have individual serial numbers which are tracked. Forms are available to registered inspectors working with the program from the WALI office in Abbotsford or from the BC Fruit Growers Association (BCFGA) office in Kelowna. A fee will be charged for the inspection forms to cover development and printing costs.
- 5. Employers should provide inspectors with a copy of previous inspections (if one was completed). This is to ensure that any recommendations made by the inspector have been implemented.
- 6. Inspectors <u>are required</u> to take photographs of the facility. Photographs are to be upload to a designated WALI site.
- 7. What to do with completed inspection forms:
 - a. Copy 1 (top copy) is to be left with the employer. The employer will submit it along with the LMIA to Service Canada.
 - b. Copy 2 is to be sent by the inspector to the WALI office.
 - i. These may be bundled and returned to the WALI office on monthly basis. Inspectors not returning completed inspections may be restricted from purchasing additional forms. Mandatory photographs must also be uploaded to the specified cloud-based folder.
 - ii. "Failed" inspections must also be returned.
 - c. Copy 3 is to be retained by the inspector.
- 8. After completing an inspection an inspector may:
 - a. Pass the inspection with no follow up actions.
 - b. Fail the inspection all deficiencies must be addressed before an accommodation passes inspection.

Please note – the "pass with conditions" option is lo longer available.

- 9. WALI may engage an inspector to conduct secondary spot inspections to:
 - a. monitor the consistency and quality of the inspection process,
 - b. ensure that facilities are being maintained to the required standard
 - c. in response to complaints, and/or
 - d. to ensure that the facility inspected is the actual facility being used to house workers.

II. Pre-season Inspections

The following provides specific comments/points of clarification for questions on the inspection form.

1. Employer Information

| | Question | | Additional Comments | | |
|----|-----------------------------|---|---|--|--|
| a. | Legal Name of Employer | • | | | |
| b. | CRA Business Number | • | | | |
| с. | Common name (if applicable) | • | Name that the business operates as or is referred to as | | |
| d. | Mailing address | • | | | |
| e. | Contact info | • | For the individual responsible for TFW housing | | |

2. Inspection details

| | Question Additional Comments | | |
|----|---|---|--|
| a. | Inspection date | Actual date of physical inspection | |
| b. | Property address | Civic address (or similar) of accommodations that clearly identifies the location of the building being inspected | |
| c. | Building number | If there is only one unit at the civic address it is building 1 of 1. | |
| | | A separate inspection form is required for each unit except for: | |
| | • | multiple suites of exactly the same style in the same building. | |
| | | Camp style arrangements where sleeping, eating and washrooms are in separate, but integrated structures. | |
| | | Multiple suites or units in one house that are not exactly the same, (e.g. a suite on the main floor and a separate suite in the basement) must have separate inspection forms. | |
| d. | Has this building been previously inspected as part of the TFW program? | New question To advise program administrators that there should be inspection reports from prior years. | |

| | Question | | Additional Comments |
|----|---|---------------------------------|---|
| e. | Are the accommodations used solely for TFW housing? | • • / • / • / • / | New question Included for clarification. This was the original intent. All facilities that are part of the inspection must be <u>used only by the TFWs while occupied by</u> <u>TFWs</u> . Space and amenities may not be shared with other tenants or the employer. The space may be used by other people when there are no TFWs using the accommodations. If accommodations are shared (a "No" answer), the inspection automatically fails. |

3. Exterior/General Accommodation Information

| | Question | Additional Comments |
|----|--|---|
| a. | Nature of Accommodation | Manufactured Homes - must include model number. Recreation type trailers, 5th wheels etc. are not permitted. "Hotel style studio suites" refers to units where sleeping areas are NOT partitioned from common areas (i.e. the beds are in the main room). These units may have a maximum of two occupants per unit. Hotel style studio suites must have space for TFWs to cook and eat meals (i.e. table and chairs). |
| b. | If the accommodations are part of a larger building (i.e. a multipurpose building) are they sealed off from the other uses? | Look to see that there are no hazards that may affect TFW health or quality of life. |
| с. | Is the accommodation site well drained? Is there the potential of seasonal flooding? | • Look for evidence of water pooling and mold |
| d. | Is the area around the accommodation (approximately 15m in every direction or up to a property line) clean and well maintained? | New question Expect the area to be mowed and free of waste or stored items (i.e. old freezers, cars, pallets). |
| e. | Are the accommodations at least 30m from any building being used to shelter animals, are likely to cause offensive living conditions, or that may be hazardous to the occupants? | Protect TFW health and quality of life |
| f. | Are the accommodations detached from any building or surroundings where highly flammable materials or chemical substances are used or stored which may become hazardous to the occupants?? | Worker safety |

| g. | Are the following exterior components of the accommodation in good condition and weatherproofi. Roofiv. Exterior wallsii. Windowsv. Guttersiii. Doorsvi. Downspouts | • | Want to see that the accommodation is weatherproof Gutters & downspouts are only "Not Applicable" if the architecture of the building would not normally include/require them. |
|----|---|---|--|
| h. | Do all exterior windows and doors to be used for ventilation have correctly fitting screens in good condition? | • | Screens on windows and doors that are to be used for ventilation must be fitted and mounted correctly (i.e. not held in with duct tape) and in good repair. |
| i. | Are there sufficient exterior garbage containers with lids near the accommodations to securely contain all garbage accumulated between weekly collections? | • | Garbage is expected to be collected / removed from around the premises on a weekly basis. Exterior containers should provide adequate storage for a week's worth of domestic garbage for the number of workers in the accommodations. |
| j. | If the accommodation is a manufactured home, has skirting been installed around th bottom perimeter to protect the crawl space from debris and animals? | | Deter rodents and debris |

4. General Interior Accommodation Information

| Question | | | Additional Comments | |
|--|--|--|----------------------------|---|
| a. | Are all interior areas clean and free of ex | s of the accommodation cess stored items? | • | New question Areas that are used in occupancy calculations or that will be used by the TFWs should be clean and not used for general storage. Extra, old or damaged furniture, appliances and mattress should be removed from the accommodations. |
| b. | Are the interior com accommodations in appropriately cover i. ceilings ii. walls | good condition and | • | Flooring should not have large rips, holes or be loose Coverings should permit easy cleaning Exposed plywood/OSB is not acceptable |
| c. Are the ceilings in the accommodations' living spaces at least seven (7) feet high? | | • | Ensure adequate head space | |

| Question | | | Additional Comments | | |
|----------|--|---|---|--|--|
| d. | | • | Wording revised Inspectors must use judgement to assess if the building design, construction, heating system, insulation and ventilation appear to be sufficient to keep the accommodations in the target range for most of the time while occupied. For example, if workers will only be on site in the summer in the Okanagan, no heating system would be required, but adequate insulation and ventilation to limit the maximum temperature is required. If there is no air conditioning, employers are encouraged to provide electric fans to improve circulation. Heating and cooling ducts should be cleaned regularly. | | |
| e. f. | Is there adequate lighting by either natural or artificial means? Is there adequate ventilation by either | • | Would the lighting be reasonable in an average Canadian home? Would the lighting be reasonable in an | | |
| 1. | natural or artificial means? | | average Canadian home? | | |
| g. | Do the accommodations have basic furnishings in good repair (chairs, couches, shelves, etc.) that are compatible with the number of TFW's requested by the employer? | • | There should be adequate communal space for workers to relax. | | |
| h. | Do electrical systems appear to be correctly installed and maintained? | • | All electrical outlets have cover plates. There are an appropriate number of electrical outlets (to discourage the use of hazardous cheap electrical cords). Power bars are provided if additional outlets are needed (again to discourage cheap extension cords). There is no exposed, improperly secured wiring. | | |

5. Bedrooms

| | Question | Additional Comments |
|----|---|---|
| a. | Are the sleeping quarters partitioned from other living areas with a complete wall? | Unless a hotel style accommodation with a maximum of two people per room, all sleeping areas must be partitioned from the rest of the facility with full walls and doors. |
| | | "NA" response is only allowed for hotel style accommodation designed for maximum two persons/ room |
| | | If bedrooms are not completely separated (a "No" response) it is an automatic fail. |
| | | • A best practice is to limited the number of occupants in each bedroom to 4 people. |
| b. | Are all the beds/bunks equipped with mattresses, pillows and linens that are clean, | • <u>All items must be physically seen in person by</u> <u>inspectors</u> . |
| | sanitary, not ripped and in good condition? | Mattress must be a true "residential mattress" at least six (6) inches deep in good condition, able to comfortably support an adult. There should be no obvious sagging holes or rips). It cannot be an inflatable mattress nor a camping style mattress or other pieces of exposed foam. |
| с. | Are beds/bunks at least 20cm (8 inches) off the floor? | • |
| d. | Is there a minimum distance of 75cm (30 inches) between all beds/bunks? | • |
| e. | Has an adequate amount of enclosed storage space/ compartment been provided? | Is there reasonable space for each worker to separately store personal effects as well as general storage for larger items like excess luggage storage? |
| | | • There should be about 12 cuft (2x4x1.5) of storage per worker. |
| | | • Boxes and portable totes are not acceptable for personal storage. |

6. Bathrooms

| Question | Additional Comments |
|--|---|
| Are bathrooms partitioned from other living areas and for the <u>sole use</u> of the resident TFW's? | • These facilities must be for the <u>exclusive use</u> of the TFW while living in the accommodations (i.e. not shared with other tenants, farm visitors or the employer's family). |

| Question | Additional Comments |
|--|---|
| | It is preferred that the washrooms be located in the same building as bedrooms, but in some cases, they may need to be located in separate buildings. |
| | <u>All bathrooms must be within 30m of bedrooms.</u> |
| | If bathrooms are in a separate building, a suitable pathway that provides safe access and is lit at night will be provided. |
| | • A best practice is to cover walkways where possible. |
| b. Are toilets and showers guarded with privacy barriers? | • Toilets and showers must be in partitioned areas that allow the worker to dress in privacy. |
| | • Urinals are not to be included in occupancy calculations. |
| c. Are all toilets operational, sanitary and in good repair? | • |
| d. Have sinks (for hand washing) been installed in or near bathrooms? | • |
| | |

| | in or near bathrooms? | | |
|----|---|---|---|
| e. | Are the floors and walls of the bathrooms and shower facilities made of or covered by a suitable material that can be cleaned and sanitized? | • | Exposed plywood/OSB is not acceptable. |
| f. | Is there an adequate supply of hot water to accommodate the number of TFW's? | • | Inspector should do a reasonableness test – is the hot water tank operational and of an adequate size for the proposed number of workers. |
| | | • | Is there consistent, reasonable flow of water (i.e. does the water supply allow a toilet to be flushed while the shower is running without interrupting the flow)? |

7. Laundry Facilities

| | Question | | Additional Comments |
|----|--|---|---|
| a. | Are laundry facilities provided on site and in | • | Question changed |
| | good working condition? | • | On-site washing machines and dryers are mandatory starting in 2019. |
| | | • | Require both a washing machine and a dryer. |
| | | • | Dryers must be installed with non- combustible venting. |
| | | • | Ducts should be cleaned regularly. |

| | Question | Additional Comments |
|----|---|---|
| b. | Are laundry facilities used for washing personal protective equipment separate | Washing machines used for washing protective equipment cannot be used for the |
| | from machines designated for personal | workers' personal clothing. |
| | laundry? | |

8. Kitchen

| 8. I | Kitchen | | |
|------|--|---|--|
| | Question | | Additional Comments |
| a. | Question Are all appliances CSA approved, correctly installed, clean, and in working condition? i. Refrigerators ii. Stoves with hood fans vented to the exterior iii. Other | • | Additional Comments Question changed Stoves may be either standard residential appliances (e.g. with elements on a cooktop and an oven), permanently installed cooktops, or commercial stoves. Portable, plug-in countertop hotplates are not to be included in occupancy calculations. Assumes a "normal" residential fridge. If commercial walk-in coolers are provided they must have shelves and provide each worker with a minimum space of approximately 8x24 inches by 10 inches high. Best practice is to provide storage that allows each TFW to secure (lock up) their own food. Refrigerators must be plugged into hard wired electrical outlets (not extension cord) Stoves must have CSA approved hood fans, hard wired and vented as per code requirements (gas and electric). Gas appliances must be installed as per code. Microwaves, blenders and other appliances may be provided at the discretion of the employer, but MUST be in good repair. These appliances are often appreciated by the TFWs. |
| b. | Are the floors and walls of the kitchen facilities made of or covered by suitable material that can be cleaned and sanitized? | • | Exposed plywood/OSB is not acceptable. |
| с. | Are all counter tops longer than 3 feet | • | Wording changed |
| | supported by enclosed cabinetry? | • | The objective is to ensure that counters are more than just a "plywood" shelf serving as a kitchen counter. |
| d. | Has an adequate amount of protective food | • | Judgement of the inspector. |
| | storage and enclosed cupboard space been provided? | • | Is it reasonable for the number of workers proposed |
| | | | |

| Question | Additional Comments |
|--|--|
| adequate number of the following kitchen items, in good repair, for the number of TFW's requested by the employer? i. Plates ii. Bowls iii. Cups & drinking glasses | Expect to see one plate, bowl, cup, water glass, fork, spoon and knife per worker. For each stove (or every 7 workers) there should be a set of pots and pans (e.g. fry pan, small sauce pot and large sauce pot) and corresponding tools (e.g. spatula, serving spoons, large knives etc). |
| iv. Pots & Pans v. Cooking Utensils vi. Tables & chairs | • There should be adequate eating space (chair and table) for all of the workers to sit at a table or suitable counter and eat at the same time. Sofas, recliners and similar seating areas are not to be used in this calculation. |

9. Water Safety

| 5. | water salety | |
|----|---|--|
| | Question | Additional Comments |
| а. | How is potable (drinking) water provided? 1) A single private water well or private connection to surface water 2) A small water system (multiple users on the same system) 3) A community or municipal water supply 4) Other | Questions have been modified to better understand the sources of water and what water treatment processes are used. "Small water systems" refer to any system that is shared between users. This could include a private system that supplies multiple residences on a single farm. |
| | | • Other could include providing bottled water for all cooking and personal consumption. |
| b. | Describe the water system. | Include the location, depth of wells, surface water source and any other available information that describes where the water comes from. |
| | | Also describe any water treatment, equipment or processes used on the site to treat water. |
| c. | If water is supplied by either 1 or 2, have you included your annual water quality tests? | • Employer should attach a copy of the water test with the LMIA application. |
| | | Inspectors are not currently expected to review the water test. |
| | | • If the water test is not available, explain why and proposed steps that will be taken. |

10. Fire Safety

| Question | | Additional Comments |
|--|--|--|
| Is there a safety plan in place in case of | • | New question |
| emergency? | • | The plan should be available in English as well as languages understood by the occupants. |
| | • | The plan should include the emergency contact numbers for the appropriate Consulate or Liaison Service. |
| | • | Recommend that the plan be posted in each sleeping area (like you see in hotels) |
| | • | The plan should be reviewed with all occupants when they arrive. |
| Has the local fire department completed a | • | New question |
| fire inspection report? | • | If the property has been inspected, attached a copy of the report to this document. |
| | • | In some areas, fire departments may not have the resources to inspect every facility. |
| Do the number of unrelated occupants | • | New question |
| sleeping in the building require that a fire alarm be installed? | • | This has been part of the B.C. Building Code for several years, but has not been included as a question in the pre-season housing inspection. |
| | • | The B.C. Building Code requires a fire alarm in buildings where more than 10 unrelated people are sleeping. Local Bylaws or Fire Codes may have a lower threshold. |
| | • | A fire safety plan is required if a fire alarm is installed. |
| | • | If a fire alarm is installed a record of service and testing should be attached to this report. |
| | • | Fire departments are more aware of the program and are in most locations are willing to help employers understand and meet requirements. |
| | • | Please check with the appropriate local fire department |
| | Is there a safety plan in place in case of emergency? Has the local fire department completed a fire inspection report? Do the number of unrelated occupants sleeping in the building require that a fire | Is there a safety plan in place in case of emergency? Has the local fire department completed a fire inspection report? Do the number of unrelated occupants sleeping in the building require that a fire alarm be installed? • |

| | Question | | Additional Comments |
|----|--|---|--|
| d. | Are there the appropriate number of charged | • | Question amended |
| | and current fire extinguishers? | • | A "2A 10 BC Dry Chem 5lb" extinguisher is the minimum standard for an appropriate extinguisher. |
| | | • | A fire extinguisher must be available in the kitchen area and outside of the bedrooms. |
| | | • | Depending on the size and layout of the accommodations, additional extinguishers may be required. It is recommended that an appropriate fire safety inspection for the facility be completed. |
| | | • | Fire extinguishers must not have expired. |
| e. | Are all the fire extinguishers easily seen, accessible at all times and located away from potential heat sources and near exits? | • | |
| f. | Are smoke alarms correctly installed as per | • | Question Amended |
| | the BC Building Code and operational? | • | Have all smoke detectors been securely mounted and tested (if not part of an integrated fire system) to ensure they are operational? |
| | | • | Smoke detectors must not be expired |
| | | • | BC Building Code 3.2.4.21, requires smoke alarms in dwelling units, on each level, in each sleeping room, outside the sleeping rooms and in the hallway (if provided) these smoke alarms must be hard wired and interconnected with battery backup. |
| g. | If there are fuel fired appliances in the | • | New Question |
| | accommodation, is there an operational carbon monoxide alarm? | • | An operational carbon monoxide alarm is required where fuel (gas) fired appliances are used. |

11. Maximum Occupancy

| | Question | Additional Comments |
|----|-----------------------------------|---|
| a. | Total living space (square feet): | number of occupants= sqft/80 |
| b. | Total bedroom space (volume): | number of occupants = #cuft/300 |
| с. | Number of beds? | New question – was implied before |
| | | • Number of occupants = # of beds |
| d. | Number of toilets? | Urinals do not replace the need (count) for toilets |
| | | number of occupants = #x7 |

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| | Question | Additional Comments |
|----|-------------------------------|--|
| e. | Number of showers? | • Number of occupants = #x7 |
| f. | Number of bathroom sinks? | • Number of occupants = #x7 |
| g. | Number of washing | New question – mandatory starting this year |
| | machine/dryer pairs? | • Number of occupants = #x10 |
| h. | Number of fridges: | • Number of occupants = #x6 |
| | | • Or required space per worker in a commercial walk-in cooler. |
| i. | Number of stoves (residential | Calculation is modified |
| | "cooking ranges") | • Hot plates are not to be included in occupancy calculations |
| | | • This can be a residential stove with an oven, a permanently mounted cook top or a commercial stove. |
| | | • Commercial stoves must be correctly installed with the appropriate hood/fan. |
| | | • Calculation is based on a standard four element residential stove. If a larger commercial stove is used it should be converted to the number of equivalent residential stoves. We are looking for the cooking space available for the workers. |
| | | • Number of occupants = #x6 |
| ј. | Maximum number of occupants | Smallest number of a - i |

12. Inspection results

| | Issue | Additional Comments |
|----|--|---|
| a. | Result | "Pass with conditions" has been removed as it is no longer accepted by Service Canada |
| b. | Notes on deficiencies and additional comments | • The inspector should add additional comments on all items that do not meet the standard. |
| | | Additional comments may be made where the items do pass but could be improved. |
| | | • The inspector should also add any other relevant comments |
| | | Any "suggestions" that the inspector may have that are beyond the requirements of the inspection should be provided to the employer on a separate document. |

13. Inspector Information

| | Question | Additional Comments |
|----|----------------|---------------------|
| a. | Inspector name | • |
| b. | Phone number | • |
| C. | email | • |

| d. Inspector signature • |
|--------------------------|
|--------------------------|

14. Photographs Taken

| | Question | Additional Comments |
|----|--|---|
| a. | Have photographs of the front exterior, kitchen, bathroom and at one representative bedroom been taken? | These photographs are mandatory if not provided the inspection may not be approved by Service Canada |
| b. | Where other photographs taken? | Described photograph and why it was taken |

15. Employer Declaration

Additional Comments

• The inspector, WALI and governments may share this information with all applicable agencies that are involved with TFW program administration or worker health and safety.