April 5, 2016

The Honourable Ralph Goodale
Minister of Public Safety
House of Commons
Ottawa, Ontario K1A 0A6

Dear Minister Goodale;

Re: Safety in Canada's Armoured Car Industry

I write to you to seek your help to improve public safety and the safety of armoured car employees. Within our diverse union we are proud to represent 2,000 members in the Canadian armoured car industry. The men and women who work in this sector are routinely exposed to danger and their safety is increasingly jeopardized by the lack of comprehensive federal regulation. As part of its effort to make the industry safer Unifor is calling to establish minimum standards in employee training, vehicle specifications, crew complements and safety equipment requirements.

Presently, the armoured car industry is regulated by sporadic legislation and regulation across various jurisdictions, leaving many aspects ungoverned. Inadequate training, the use of non-armoured vehicles to transport valuables, protocols that involve all crew simultaneously leaving the vehicle and crews as small as 1 person complements, of which some are now allowed to go unarmed, all increase the danger to employees and the public.

Unifor calls on the federal government to:

- Establish a task force to better harmonize a federal regulatory framework
- Create comprehensive federal safety standards and regulations for the armoured car sector
- Establish standardized firearms, use of force and heavy vehicle training requirements
- Develop mandatory crew complements based on level of risk
- Regulate vehicle specifications
- Institute compulsory use of bullet-proof vests
Unifor is also calling to reverse a labour law change by the previous Harper government that weakened provisions for the right to refuse unsafe work. Under the Conservatives the threshold for refusing unsafe work changed from ‘potential danger’ to ‘imminent danger’. We believe this new definition puts our members’ very lives in jeopardy on a daily basis.

Since 2000, there have been more than 85 attacks on armoured cars nationwide. In the past 4 years alone there have been 15 publicly-reported robberies resulting in multiple injuries and fatalities. Most occurred in public places and there have been instances where shoot-outs have placed both armoured car workers and innocent bystanders in the potential path of a bullet. The armoured car industry, by its very nature, involves risk. However, it is the responsibility of policy makers to create a regulatory environment that minimizes danger and ensures that unacceptable risks to public and worker safety do not become the terrain of market competition. Currently armoured car companies are engaging in heightened price competition on the bases of lowered security standards, through reduced crew complements, resulting in an increase of gun crime involving armed robbery.

In addition to safety concerns it’s estimated that armoured car robberies have channeled tens of millions to organized crime over the past 15 years. As Minister of Public Safety, with oversight of the RCMP and its administration of the Canadian Firearms Program, stemming illegal firearms activity and funding for organized crime falls under your mandate. Furthermore the occupation-related “authorization to carry” permits and associated training requirements are regulated under federal firearms legislation.

The existence of advanced armoured car legislation in other jurisdictions provides Canadian policy makers with solid guidance and real-world best practices. Through extensive consultation with our members in the industry, and examination of international regulatory practice, we developed the enclosed discussion paper, Armed and Safe, which outlines our recommendations in greater detail.

A concrete first step by your Ministry to address these issues would be to establish a Task Force on the armoured car industry to undertake comprehensive policy research, gather stakeholders’ views and develop recommendations and legislative guidance.

We seek a meeting with you at your earliest possible convenience to discuss our concerns. Unifor National Representative Mike Armstrong will follow up with your office in the near future to arrange a meeting with yourself and a delegation of Unifor staff and armoured car local union leadership.
We hope that you will accept our invitation and look forward to working together to ensure that, in the future, armoured car employees are as safe as their cargo.

Yours truly,

Jerry Dias
National President

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cc: Scott Doherty, Mike Armstrong, Bob Orr