



October 16, 2020

MEMO TO : Park Board Commissioners

FROM : Donnie Rosa  
General Manager, Vancouver Board of Parks and Recreation

SUBJECT : **COVID-19 Mandatory Mask Policy Considerations – Board Briefing Memo**

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Dear Commissioners,

On October 20, 2020, City Council is scheduled to consider a member motion titled [Mandatory Mask Policy for Vancouver Civic Facilities](#). Subject to Council approval, the motion recommends that the Vancouver Park Board consider adopting a mandatory mask policy for facilities under its jurisdiction. This memo outlines the current Park Board practice for mask wearing, and the Park Board specific considerations for Commissioners to contemplate should they wish to consider whether to adopt a broad mandatory mask policy in all Park Board facilities.

Current approved safety plans in place at Park Board facilities are based on the hierarchy of controls to prevent COVID-19 transmission ([as described by WorkSafe BC](#)). Personal protective equipment (PPE) including wearing non-medical masks is lowest priority. Park Board staff have applied more effective measures such as physical distancing, engineering controls (plexiglass barriers, floor markings, etc.), and administrative controls (hand washing requirements, etc.) to ensure the safety of staff and the public.

Mask wearing by patrons is encouraged but not required and Community centre staff and patrons are provided non-medical masks free of charge upon request, for situations when they feel physical distancing is difficult to maintain. These practices are in line with government and industry guidelines, as well as through consultation with key stakeholders and partners such as sport organizations and not-for-profit partner organizations.

The Park Board closely follows public health and industry guidance and is able to modify health and safety plans and adapt operations quickly according to any recommended change in guidance. Park Board staff advise to continue to closely align our policies and practices with guidance from the Provincial Health Office and Vancouver Coastal Health (VCH). Currently VCH does not support a Vancouver Mandatory Mask Policy (see [COVID-19 FAQs](#)), stating that;

*“...masks may give a false sense of security and are likely to increase the number of times a person will touch their own face (e.g., to adjust the mask). Face coverings keep our own droplets in but may not prevent transmission from others. The best way for you to stay safe is to wash your hands, maintain physical distance from others and keep the provincial guidelines for social interactions top of mind.”*

As reported in a recent [Daily Hive article](#), in a joint letter responding to the motion being put forward at City Council, VCH's Chief Medical Health Officer, Patricia Daly, and Deputy Chief Medical Health Officer, Mark Lysyshyn, provided the following recommendation:

*“Given the excellent COVID-19 safety plans in place at City facilities, and the relatively low rate of COVID-19 infection in the local population, there is no justification for a*



*mandatory non-medical mask policy in City of Vancouver facilities at this time and we strongly recommend that it not be pursued”.*

Generally, mandatory mask wearing has only been a recommendation in the cases where physical distancing cannot be maintained or in extreme environmental situations with accelerating case counts. In other parts of Canada where community mandatory mask policies have been put in place, this has largely been done at the recommendation of the local health authority based on population health data and careful evaluation of risks and benefits for the public. Vancouver Coastal Health currently advises strongly against a mandatory mask policy for City of Vancouver facilities, citing that:

*“...several municipal governments in Ontario recently implement mandatory masks policies, but ... this was rolled out based on the recommendation of local public health authorities in the context of the varying COVID-19 transmission risks in the jurisdictions.”*

The following points highlight key considerations specific to Park Board facilities and services regarding a potential mandatory mask policy.

1. The Park Board is following safety guidelines from other agencies and authorities which detail where and when masks should be worn. This includes primarily Vancouver Coastal Health but also ViaSport’s Return to Sport Guidelines, BC Recreation & Parks Association’s Sector Guideline for Restarting Operations, and Lifesaving Society’s Guidelines for Reopening BC’s Pools and Waterfronts. The Park Board closely follows such information and is able to modify health and safety plans and adapt operations according to any recommended change in guidance.
2. Safety plans in place at Park Board facilities are based on the hierarchy of controls to prevent COVID-19 transmission as noted above. Vancouver Coastal Health has expressed confidence in our current practices and indicated mask wearing may reduce vigilance on more effective measures to prevent transmission.
3. Previous Park Board closures disproportionately impacted more vulnerable groups. A mandatory mask wearing policy could further create barriers and risks for vulnerable people, who have circumstances that make requiring mask wearing difficult, whether due to age, physical ability, mental health issues, language barriers, or income, and mandating masks could pose barriers to accessing services.
4. Park Board’s unique service delivery includes partnerships with Community Centre Associations (CCAs), and long-standing affiliations with non-for-profit partners, such as the Vancouver Botanical Gardens Association. These relationships require a collaborative approach to decision making at many Park Board sites.
5. Some staff and patrons may feel safer and appreciate mandatory mask wearing, while others may not. Masks cannot be tolerated by everyone, including staff and patrons with certain underlying medical conditions. Staff are not in a position to determine who might qualify for an exemption to the policy (current guidance indicates children under 2 years and people with breathing difficulties should not wear a non-medical mask). A mandatory mask policy could also increase risks and conflicts for staff interacting with individuals who refuse to wear a mask. Clarification on and exemptions to the policy would be needed.



6. A mandatory mask policy should focus on education as the primary enforcement tool, with public expectations carefully managed, as other forms of enforcement would be difficult to resource and manage across the system. Indoor staffed facilities could manage mask wearing by posting staff at entrances (although this would increase operational costs for Park Board facilities) but enforcement at outdoor facilities that are largely not staffed, would not be operationally feasible.
7. COVID-19 critical supplies and PPE including masks are centrally procured and dispensed through the City of Vancouver's Emergency Operations Centre (EOC). A mandatory mask policy could have supply chain impacts.
8. Additional funding would be necessary to purchase masks and offer masks to those who do not have their own. Enforcing mask wearing at entry points of community centres for example, will require additional staffing as we currently do not have sufficient resources to do this. Additional communication requirements such as signage, website and ongoing media/communications would be required.
9. Consultation with unions would be recommended prior to adoption of any new policy that would have implications for CUPE 15 and 1004 staff.

In consideration of the information above, staff do not recommend proceeding with a mandatory mask wearing policy at this time. However, if the Park Board were to move forward with a mask wearing policy, staff recommend the following:

- Clarify what facilities are included/excluded;
- Only require masks in shared and high traffic areas;
- Identify exempted groups; for example, allow for discretionary use of masks in bookable/programmed spaces (e.g. gyms, pools, arenas and community program rooms);
- Consult with key partners and unions;
- Consider the budget impact and reprioritization of funding required to implement this policy;
- Clarify that monitoring and enforcement requirements would be primarily education based;
- Consider the trigger points to amend or discontinue the policy as required.

Regards,

A handwritten signature in black ink, appearing to read "Donnie Rosa", written over a circular stamp or mark.

Donnie Rosa  
General Manager - Vancouver Board of Parks and Recreation

/si/clc

Copy to: PB Senior Leadership Team  
PB Communications