

Radon: A Toolkit for Union Representatives

For union health and safety representatives · Revised August 2026 · RadonTest.ca

Current version, and the citable source for this document:

radontest.ca/blogs/articles/union-representative-radon-toolkit-canada

For union health and safety representatives. On **30 January 2027** the radon exposure limit for federally regulated workplaces drops from 800 to **200 Bq/m³** as an annual average. Peer-reviewed Canadian research puts **603,000 workers** above 100 Bq/m³, and the most affected occupations are administrative assistants, office support workers, receptionists and elementary teachers — not miners. The measurement window is seasonal and effectively closes at the end of January. **Free to reproduce.**

What makes radon different

It is invisible and cannot be inferred. No walkthrough reveals it, no symptom points to it, no inspector can observe it. The only way anyone knows is a measurement — which makes the ask unusually simple. You are not asking for an assessment or an opinion. You are asking whether a number exists.

Most employers genuinely have not thought about it. Radon has not historically been part of building management in Canada. In most cases you are pushing against unfamiliarity rather than resistance, which calls for a different opening than a hazard the employer has already declined to fix.

The risk is cumulative and long-latency. Nobody gets sick this week, which makes it easy to defer indefinitely. That is exactly why documenting the ask matters more here than for a hazard that produces incidents.

The ask

“Has this building been tested for radon? If so, when, what were the results, and where are the records kept? If not, what is the plan to test during the coming heating season?”

Put it in writing, through the committee, and get it minuted.

The mechanism behind it

Federally regulated workplaces

- The employer must **respond in writing to a committee recommendation within a defined period** under the Canada Labour Code, and must provide the committee with hazard-assessment reports.
- Where a hazard investigation is required, the employer appoints a **qualified person**, notifies the committee of the investigation **and of that person’s name**, and the resulting report is signed and retained for **thirty years**.
- The employer keeps a **written control procedure**, kept current and **readily available for examination by employees**. If one exists, you are entitled to see it.
- A worker may complain **directly to the Labour Program** without raising it with the employer first — though the committee route resolves most of these and should be tried first.

Provincially regulated workplaces

No province or territory has a numeric radon exposure limit. What applies is the general duty to take reasonable precautions against recognised hazards — and once radon has been raised in writing, it is a hazard the employer knows about. General duty provisions are principally about what happens after identification.

Telling a real answer from a token one

What you may be told	What to check
"We tested and it was fine."	Ask for the report: date, method, number of detectors, locations, laboratory, and the actual numbers.
"We did a test."	How many detectors? One in EACH occupied room in contact with the ground, one per 200 m ² in larger areas, plus quality-control detectors. One reading for a building is not a compliant measurement.
"We used a monitor."	Short-term readings and continuous monitors are not appropriate for deciding whether to act. The protocol requires a long-term measurement of at least three months .
"We tested in the summer."	Measurement should be during the heating season. A summer-only result that comes back low is not a reliable answer.
"It was tested years ago."	Ask about renovations, ventilation changes, energy retrofits, or a change in how the lower floors are used. Any of those is a reason to retest.
"Under 200, nothing to do."	Correct as far as it goes. Ask where in the range it fell — Health Canada notes mitigation is worth considering as results approach the guideline.

A laboratory certificate is one of five elements in a compliant record, and four of the five are generated in the building rather than by the lab.

Raising it across multiple employers

- **Ask the same question everywhere, in the same words.** Identical wording produces comparable answers, and the pattern is itself information — if eleven of twelve sites have never tested, that is a bargaining fact rather than an anecdote.
- **Start with the buildings most likely to be affected** — occupied space at or below grade, older buildings, and regions with higher measured levels. Regional data indicates probability, never a result for a specific building.
- **Take the phased-plan answer seriously.** An employer with many buildings may reasonably say they cannot test everything in one season. A documented, risk-ranked, phased plan is legitimate. "Eventually" without a schedule is not. The distinction is a written plan with dates.
- **Bargaining and policy.** Testing on a defined cycle, and a commitment to act on results within Health Canada's timelines, is concrete, low-cost, measurable, and difficult to argue against in principle.

The timing argument

A valid long-term test needs a minimum of **91 days**, ideally during the heating season. Counting back from 30 January 2027 puts detector placement in **early November 2026**, and placement after the end of January pushes the measurement outside the heating season.

The usable window is roughly 1 October to the end of January. This is arithmetic rather than a legal deadline — but it means an employer who defers a decision by one quarter has in practice deferred it by a year. It is the most useful thing to put in front of an employer who is sympathetic but slow: not a threat, and not arguable.

If the question is ignored

Try the cooperative route properly first. Most of these resolve at the committee, and an employer given a reasonable opportunity to respond usually does. Document the ask, the date and the response. If it is ignored or repeatedly deferred:

- **Federally regulated:** a complaint may be made directly to the **Labour Program** at Employment and Social Development Canada, and it can result in an inspection.
- **Provincially regulated:** the provincial or territorial health and safety authority — the CNESST in Quebec — with the general duty as the basis.

- **Federal departments and agencies:** radon results and related correspondence are records subject to the *Access to Information Act*.

Order matters. Escalating before the employer has had a fair chance to respond usually costs more than it gains, and the documented sequence is what makes an escalation credible.

About this document. Published by **RadonTest.ca**, an independent Canadian radon testing service. We supply C-NRPP-listed detectors and accredited laboratory analysis across Canada, in English and French. We do not perform mitigation work and we earn nothing from what a result says — which is why we can write a document like this one. **Free to reproduce and distribute;** please keep the attribution so readers can find the current version.

We do not interpret health risk — Health Canada is the health authority on radon in Canada (canada.ca/radon). This document describes publicly available regulatory information and **is not legal advice**.

Sources. Brobbey A, Rydz E, Fenton S, Demers PA, Ge CB, Peters CE, “Characterizing occupational radon exposure greater than 100 Bq/m³ in a highly exposed country,” *Scientific Reports* 2022;12:21323. Canada Gazette, Part II, Vol. 160, No. 3 (SOR/2026-10). Canada Occupational Health and Safety Regulations (SOR/86-304), ss. 10.4, 10.5, 10.6, 10.26. Canada Labour Code, Part II. Employment and Social Development Canada. Health Canada, Guide for Radon Measurements in Public Buildings; Canadian radon guideline. C-NRPP.