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# **Void Where Prohibited Revisited**

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**The  
Trickle-  
Down  
Effect  
of  
OSHA's  
At-  
Will  
Bathroom-  
Break  
Regulation**

**Marc Linder**

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Iowa City  
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## Part IV

### An International Comparative Interlude

In the factory, you learn to hold it. You keep the line moving, regardless of what it is you're processing or assembling. It's not a matter of a capitalist jackboot pressing down on the proletariat's throat. It's the simple but all-consuming demands of the job. The line must move. Interruptions cost money.<sup>1</sup>

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<sup>1</sup>Andrew Dreschei, "A Salute to Those Who Can't Take a Pee Break," *Hamilton Spectator*, Aug. 13, 1999, at A3 (Lexis).



## Meanwhile Up in Civilized Canada: Pee for a Fee

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It is very difficult for most of us to believe that being able to use the bathroom is a serious issue in the American workplace.<sup>1</sup>

The problem of workplace restrictions on toilet use is by no means confined to the United States. In Canada it is not even limited to nonunion workplaces. For example, in 1994, management at Gainers, Inc., an Edmonton, Alberta meat-packing plant organized by the UFCW, asserting that “systematic abuse of breaks” had lowered productivity and would cost the company \$1 million annually,<sup>2</sup> imposed a “pee for a fee” rule on its 890 employees<sup>3</sup>: “If employees need to use the washroom outside of [two 15-minute] scheduled breaks, they must report to supervisors, who record the time of departure and return and dock workers’ pay at the end of the week,” which worked out to about one dollar per bathroom break. While “angry” workers asked “[h]ow can they charge you for going to the washroom,” the Alberta Labour Ministry confirmed that nothing in the provincial employment code “requires a person to be paid when they don’t work.”<sup>4</sup>

In 1998<sup>5</sup> this innovative approach to suppressing workers’ need to void

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<sup>1</sup>Diversity Training Newsletter, May-June 1998, on [http://www.diversitytraining.com/may\\_june.html](http://www.diversitytraining.com/may_june.html).

<sup>2</sup>“Workers Want New Washroom Rule Flushed,” *Toronto Star*, Sept. 21, 1994, at A22 (Lexis).

<sup>3</sup>“Workers Are Very Pee-ved,” *Hamilton Spectator*, Sept. 28, 1994, at A14 (Lexis).

<sup>4</sup>“Workers Want New Washroom Rule Flushed.” According to Howard Levitt, “Taking Frequent Smoke Breaks? You Could Be Stealing Time,” *Toronto Star*, Nov. 21, 1994, at D3 (Lexis), workers at Gainers were required to punch out when they took unscheduled bathroom breaks.

<sup>5</sup>In May of that year the author’s op-ed piece was reprinted in a Canadian publication; Marc Linder, “Fighting for Restroom Rights,” *Workplace News*, May 1998, at 5, col. 1-2, at 6, col. 5.

spread to a Maple Leaf Pork plant in Burlington, Ontario, which was owned by Maple Leaf Foods, Canada's largest food processing company, which in the interim had bought the Gainers plant in Edmonton (and shut it down permanently after the UFCW had struck it as part of a nationwide strike). The employer's demand for restricting bathroom breaks was part and parcel of its plans to compete with U.S. firms in the world market. "Faced with a mature Canadian market," the company decided to orient its growth to Asia, and with 40 percent of the Burlington plant's output being sold in the Far East, Maple Leaf Foods insisted that it had to close the 50-percent gap between Canadian wages and those of its U.S. competitors.<sup>6</sup>

Significantly, Maple Leaf Food's strategy for pushing Canadian workers' wages down to lower, U.S. levels also brought with it the drive to undercut U.S. employers' oppressive toilet-break policies, almost precisely at the time that OSHA was issuing its Memorandum outlawing them. Workers at the Burlington plant struck on November 15, 1997, after the company in contract negotiations had proposed both hourly wage cuts of six to nine dollars and, "[a]s a deterrent to excess usage' of the washroom," a 20-minute weekly cap on toilet breaks:

Any employee who goes beyond the limit will see his pay docked at either double or triple time, depending on the severity of the problem. They will continue to be docked for personal breaks until they've gotten their bathroom habits in line for at least a year. Only those with a doctor's note attesting to a medical problem will be excused from the practice.

To put it bluntly, one worker says: "It's crap."

Working in temperatures of 38 to 40 degrees Fahrenheit means "you gotta go," he adds.

Workers maintain the company has lost sight of the fact at least half the time will be gobbled up by disrobing and robing again before they return to work. Most of the workers wear two aprons, arm guards, gloves, smocks and coats.

And they are required to wash their hands for a minimum of one minute after using the washroom as a safeguard against contaminating the raw pork they're working with.<sup>7</sup>

The executive vice-president of Maple Leaf Foods, Pat Jones, conceded that

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<sup>6</sup>Paul Mitchell, "Boar War: Lower U.S. Labour Costs Are Squeezing Pork Processors and Workers," *Hamilton Spectator*, Oct. 14, 1997, at E1 (Lexis). See also Katy Lerougetel, "Meatpackers in Canada Strike Against Company's Offensive on Wages, Rules," *The Militant* 61(42) (Dec. 1, 1997), on [http://www.themilitant.com/1997/6142/6142\\_24.html](http://www.themilitant.com/1997/6142/6142_24.html); Susan Berman and Robert Simms, "Striking Meat-Packers in Canada Defy Plant Shutdown, Win Support," *The Militant* 61(43) (Dec. 8, 1997), on [http://www.themilitant.com/1997/6143/6143\\_6.html](http://www.themilitant.com/1997/6143/6143_6.html).

<sup>7</sup>Eleanor Tait, "Washroom Trek Limit Last Straw for Union," *Hamilton Spectator*, Nov. 22, 1997, at D9 (Lexis).

all “[t]hat may be true.... But the company has the same contract language at other plants.” He then revealed how market disincentives are superior to force as a technique for modifying potentially anti-capitalist working-class behavior: ““Our experience in those factories is once people are docked for going to the washroom or have to pay for excesses, it stops.”” Jones’s response to a reporter’s question as to whether the proposed regime would also apply to managers—namely, that he was “not aware” of any managers who ““abuse[d] their washroom privileges””—prompted the journalist to offer this skeptical speculation: “Possibly it’s because they are all dedicated employees. More likely it’s because nobody is monitoring them the same as the men and women on the line.”<sup>8</sup> To justify a measure bound to strike observers as outlandish, Jones offered the same almost reasonable-sounding explanation that would make Jim Beam Brands Company infamous almost five years later:<sup>9</sup>

Think about it in practical terms, says Jones. You have an opportunity to go to the washroom when you get to work in the morning. About two hours later you have a coffee break and you can go again. A few hours later you can go during your lunch break. Then you have your afternoon break when you can go again, and then two hours later it’s quitting time.

But if the washroom breaks are dear to the workers, then let the union come up with another proposal, Jones said. “We’re not unreasonable people.”<sup>10</sup>

Referring to the hourly wage and benefit amount at the Burlington plant, which the company wanted reduced to the U.S. level of \$16.50 (Canadian), Jones admitted: “It’s not the washroom breaks that are the problem.... ‘The real problem is the \$25.08.’”<sup>11</sup>

After the strike had gone on for more than three months, the company threatened to shut down the plant if the union did not accept its final offer, which screwed average hourly wages down from \$17.50 to \$11.25. While Maple Leaf Foods sought to buy out the workers’ contracts with a bonus offer of between \$10,000 and \$33,000, each worker nevertheless stood to lose about \$80,000 over the life of the six-year collective bargaining agreement. In March 1998, 55 percent of those voting accepted the offer.<sup>12</sup> Although UFCW Local 1227 requested

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<sup>8</sup>Andrew Dreschel, “Maple Leaf Strikers Face New Corporate Toughness,” *Hamilton Spectator*, Jan. 21, 1998, at A9 (Lexis).

<sup>9</sup>See below ch. 13.

<sup>10</sup>Dreschel, “Maple Leaf Strikers Face New Corporate Toughness.”

<sup>11</sup>Andrew Dreschel, “Maple Leaf Strikers Face New Corporate Toughness,” *Hamilton Spectator*, Jan. 21, 1998, at A9 (Lexis).

<sup>12</sup>Craig Sumi, “Unions Vows to Fight On: Maple Leaf Threatens to Shut Down Plant,” *Hamilton Spectator*, Feb. 28, 1998, at N1 (Lexis); Craig Sumi, “Maple Leaf: Yes:

that the Ontario Labour Relations Board set aside the election on the grounds that the signing bonuses were bribes to buy votes, the union ultimately signed the contract.<sup>13</sup>

The collective bargaining agreement that the unions and its members were constrained to accept also contained a remarkable provision, which, according to an arbitrator, “initially deducted the time used on each break from an employee’s weekly hours worked. The reason for this was that the Company contended there was abuse of the personal break time to the point where there was a significant economic cost.”<sup>14</sup> Article 14 of the collective bargaining agreement, labelled, “Personal Breaks,” provided:

An employee will not be disciplined or discharged as a result of authorized usage of time granted by the Company for personal breaks. However, as a deterrent to excess usage the following measures apply:

(a) An employee will have the time used on each break deducted from their weekly hours worked. Sections (b), (c), and (d)...will not apply to employees who have a specific medical condition which is supported by medical documentation which is acceptable to the Company which necessitates greater than normal use of the washroom.

(b) An employee who uses more than twenty...minutes total time per week, in any four...weeks in a twelve...month period, shall have all subsequent time used on each personal break deducted from their weekly hours worked at the rate of double the time used.

(c) Any employee who uses more than twenty...minutes total time per week, in any twelve...weeks in a twelve...month period, shall have all subsequent time used on each personal break deducted from their weekly hours worked at the rate of triple the time used.

(d) If an employee reaches a level as outlined in Section (b) or (c)...“they will be held at that level until they have had twelve...clear months without any week being more than twenty...minutes total time used for personal breaks. In such case, the employee will revert to the next lower level of reduction and so on until they are returned to the level of

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Bitter Burlington Strikers Accept Pay Cuts to Save 900 Jobs,” *Hamilton Spectator*, Mar. 7, 1998, at A1 (Lexis).

<sup>13</sup>Craig Sumi, “Labour Deal Hanging as Maple Leaf Workers Return,” *Hamilton Spectator*, Mar. 25, 1998, at D6 (Lexis); Ross Longbottom, “Maple Leaf Union Accepts Deal: Workers Pressure Removes Challenge to New Contract,” *Hamilton Spectator*, Mar. 28, 1998, at N1 (Lexis).

<sup>14</sup>Maple Leaf Pork and United Food and Commercial Workers International Union Local 1227, 83 L.A.C. (4th Ser.) 78, 79 (Arb. Stanley Beck, 1999). According to the arbitrator, a union spokesman in 1995 agreed with the employer that ““excessive”” time for breaks was a problem, but asserted that it was partly of the firm’s own making because, by banning smoking in the bathrooms, it “forced employees to go to the cafeteria.” *Id.* at 79.

deduction outlined in Section (a)....<sup>15</sup>

In a memorandum of agreement, signed on March 26, 1998, which appeared as a Letter of Understanding in the contract, a clarification was added: “It is understood that employee will have the first twenty minutes of personal breaks in a calendar week without charge. For more clarity: Twenty minutes personal break time per week will be provided to each employee without deduction from his/her wages.” In addition, the memorandum ratcheted down the penalty rate of the sections (b) and (c) from double to single time (which thus became identical with the penalty of section (a)) and from triple to double time.<sup>16</sup>

Jose Cordeiro, who had worked at the plant since 1979 and trimmed jowls on the continuously moving hog cutting line at very cold temperatures, had suffered from benign prostatic hypertrophy (enlarged prostate) since 1982, which caused him to urinate more frequently and urgently than normal men.<sup>17</sup> Ironically, the 58-year-old Cordeiro stated that he had acquired this condition as a result of complying with the earlier plant break rule, which had reduced bathroom breaks on company time from three to two; he refrained from urinating more frequently, developed an infection, and was hospitalized: “After this I can’t hold it anymore like before and I don’t want to be sick again because I know what I suffer.... That’s why I pay the price.” Cordeiro meant the literal price of two or three extra daily admissions to the bathroom, which by the time of the arbitration had already cost him about \$400 during the previous year (or \$10 a week) in addition to his hourly wage reduction from \$17 to \$10.<sup>18</sup>

Maple Leaf Foods took the position that it was not applying the penalty provisions of sections (b), (c), or (d), but was merely applying section (a), which, unlike those sections, does not exempt workers with a medical condition. In the logic-chopping words of the employer’s lawyer, Dan Shields: “It’s not docked (pay). They [sic] didn’t work. If you’re not working you will not be paid.’ But Shields argues the limits are not mean-spirited, but an attempt to save the company money and production. ‘There will be evidence of a significant problem with unauthorized use of the washroom which requires the use of spares or

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<sup>15</sup>Maple Leaf Pork and United Food and Commercial Workers International Union Local 1227, 83 L.A.C. (4th Ser.) at 79-80.

<sup>16</sup>Maple Leaf Pork and United Food and Commercial Workers International Union Local 1227, 83 L.A.C. (4th Ser.) at 80.

<sup>17</sup>Maple Leaf Pork and United Food and Commercial Workers International Union Local 1227, 83 L.A.C. (4th Ser.) at 81.

<sup>18</sup>“Maple Leaf Docks Man’s Pay \$400 Over Too Many Washroom Breaks,” (Kitchener-Waterloo) *The Record*, Apr. 17, 1999, at E2 (Lexis).

shutting down the line,' Shields told the arbitrator."<sup>19</sup> Specifically, Maple Leaf Foods' vice president for manufacturing testified that unscheduled bathroom breaks had cost the company \$2 million a year before the new contract had been signed. The company's president Pat Jones also pleaded with those who characterized the policy as "'being mean of us...to understand it's a very substantial impact for us on cost and productivity.'"<sup>20</sup> (In 1997, the company's sales reached \$3.7 billion, while its \$117 million in earnings from operations generated a 7.7 percent return on net assets.)<sup>21</sup> Jones also sought to legitimize his policy by asserting that other pork processors imposed similar restrictions, though a newspaper reporter could not confirm the existence of this practice elsewhere.<sup>22</sup>

When Cordeiro (or any other worker) needed to go to the toilet, he signaled his need for a relief person. When that person arrived, Cordeiro had to take off his heavy gloves and apron and walk 100 meters to the bathroom and then repeat the process in reverse. Cordeiro estimated that a break took him five minutes.<sup>23</sup> But he did not have to worry about timing it since a supervisor was assigned that task.<sup>24</sup>

The union alleged that the toilet-break provision violated the Ontario Human Rights Code, but only as applied to a worker with a medical condition, and the arbitrator agreed that it did constitute adverse-effect discrimination against Cordeiro, whose handicap made it impossible for him to comply with the rule. The arbitrator also ruled that the employer would suffer no undue hardship in allowing Cordeiro the additional time he needed.<sup>25</sup>

In launching its human rights appeal, the UFCW argued: "'Maple Leaf Meats seems to believe it has the right to punish an employee for having a physical disability. We say that's wrong.'"<sup>26</sup> The union apparently found it entirely acceptable, however, for the employer to punish employees for being human beings, who must void more than four times a week for five minutes outside of breaks

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<sup>19</sup>"Maple Leaf Docks Man's Pay \$400 Over Too Many Washroom Breaks."

<sup>20</sup>Ed Rogers, "Worker Pays a Price for Washroom Visits, Maple Leaf Says They're Too Costly" *Hamilton Spectator*, June 12, 1999, at B7 (Lexis).

<sup>21</sup>[http://www.mapleleaf.com/investors/financial\\_highlights.htm](http://www.mapleleaf.com/investors/financial_highlights.htm).

<sup>22</sup>Rogers, "Worker Pays a Price for Washroom Visits, Maple Leaf Says They're Too Costly."

<sup>23</sup>Maple Leaf Pork and United Food and Commercial Workers International Union Local 1227, 83 L.A.C. (4th Ser.) at 82.

<sup>24</sup>Ed Rogers, "Toilet Time for Maple Leaf Worker Focus of Arbitration," *Hamilton Spectator*, Apr. 15, 1999, at A1 (Lexis).

<sup>25</sup>Maple Leaf Pork and United Food and Commercial Workers International Union Local 1227, 83 L.A.C. (4th Ser.) at 83-85.

<sup>26</sup>UFCW News Release, "UFCW Local 1227 Launches Human Rights Appeal," Apr. 14, 1999, on <http://www.ufcw.ca/news/19990414.htm>.

prescribed by their employer. In contrast, a journalist captured the essence of this dispute much more profoundly than the UFCW in commenting that “the only unusual thing about the provision as it applies to [Cordeiro’s] brothers and sisters is that the time restriction is formalized by contract language. The fact is, putting up with restrictions on washroom visitations is pretty standard stuff when you’re fettered to a factory floor.”<sup>27</sup>

Unsurprisingly, neither anyone at the UFCW Local 1227 office nor its president William Foley returned any of the author’s many telephone messages. When asked why the union had not contested the validity of the rule per se, the labor lawyer who handled the arbitration for the union, Michael Mitchell, was not forthcoming: “We are not acting for that Local any longer as it has joined the main Ontario Local 175. I am concerned in answering your question about questions of privilege etc. This much is on the public record: The contract containing this clause came after a long and extremely bitter strike in which, inter alia, wages were cut by many dollars an hour and other major concessions were won by the employer. There was a compulsory vote among the members, which the employer can force under Ontario law, and the employer offered many thousands of dollars in one-time payments to employees for in effect surrendering their rights and voting for the new contract. The employer narrowly won the vote and what followed was I believe a memorandum that was actually [sic] freely agreed to, I believe, (it has been awhile), if memory serves, the memorandum modified the original even more stringent provision regarding washroom breaks. In any event our brief was to handle the matter as we did.”<sup>28</sup> More startling is the fact that, despite the large number of articles about Maple Leaf Foods’s outrageous toilet tax in the mainstream press, a Canadian UFCW safety and health expert had never heard of the situation.<sup>29</sup>

These “pee-for-a-fee” cases in Canada refute the claim of the lawyer representing the workers in France who in 1995 had sued their employer, yet another slaughterhouse, for instituting a rule that docked their wages by 50 francs for going to the bathroom outside of the three scheduled five-minute breaks at 8:05, 11:20, and 2:05, that “he had searched in France and beyond without finding any other case of a company attempting to restrict employees’ rights in this way. ‘This was a first, and I think it will be a last.’”<sup>30</sup>

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<sup>27</sup>Dreschel, “A Salute to Those Who Can’t Take a Pee Break.”

<sup>28</sup>Email from Michael Mitchell, Sacks, Greenblatt, Mitchell, Toronto, to Marc Linder (Oct. 15, 2002).

<sup>29</sup>“I do not know the answer to why or how this crap got into a collective agreement. Piss on it, I say!” Email from Larry Stoffman, UFCW, to Marc Linder (Sept. 18, 2002).

<sup>30</sup>Andrew Jack, “French Factory Workers Flushed with Victory,” *Financial Times*, Mar. 19, 1996, at 3 (Lexis). See below ch. 10.

Four years after OSHA had confessed error and issued its Memorandum, a leading leftist health and safety law professor in Canada (seconded by one of the country's leading union health and safety advocates),<sup>31</sup> when asked about the lawfulness of these restrictions on workplace voiding, still clung to OSHA's discredited interpretation:

There is nothing specific that I could find in Ontario's OHS [Occupational Health and Safety] Act, although in the Industrial Establishments regulation (Ontario Regulation 851) there is a provision regarding buildings (s. 120) that says that the Ontario Building Code applies to industrial establishments with respect to, *inter alia*, washrooms. So employers have to provide them, but there is nothing specific about allowing workers free access to them that I can find. The provincial Employment Standards Act only provides for 30 minute eating periods every five hours and says nothing about bathroom breaks. So on the face of it workers might have a hard time claiming a legal entitlement to bathroom breaks either on OHS or employment standards grounds.<sup>32</sup>

The director of Ontario's Occupational Health and Safety Branch of the Operations Division of the Ministry of Labour initially took virtually the identical position as OSHA officials in the United States when the author had questioned them between 1995 and 1998. When asked whether the requirement that a certain number of toilets be available according to the number of workers under the provincial Building Code<sup>33</sup> included the obligation to let workers use them, Ed McCloskey replied: "That's a stretch." When asked about the legality of the so-called fee-to-pee scheme of charging workers (say) one dollar for each minute of bathroom break time beyond the 30-minute meal break guaranteed by the Ontario Employment Standards Act,<sup>34</sup> he replied that he was not clear that the question implicated an occupational health and safety issue as distinguished from a labor standards issue, but that a worker filing a complaint under the Employment Standards Act probably "wouldn't have a leg to stand on." Nevertheless, he emphasized that the problem had never arisen and that neither the ranking officials in

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<sup>31</sup>While expressing agreement with Eric Tucker "on the legal issues," she added: "In Canada of course we have the right to refuse unsafe work so a worker could simply invoke that if they needed to go to the bathroom." Email from Cathy Walker, Canadian Auto Workers, to Marc Linder (Sept. 6, 2002).

<sup>32</sup>Email from Prof. Eric Tucker, Osgoode Hall Law School, to Marc Linder (Sept. 6, 2002).

<sup>33</sup>Building Code Act Regulation, Ontario Reg. 403/97, sect. 3.7.4.9 (industrial occupancy).

<sup>34</sup>"An employer shall give an employee an eating period of at least 30 minutes at intervals that will result in the employee working no more than five consecutive hours without an eating period." Employment Standards Act, 2000, c. 41, sect 20 (1).

his Branch nor the director of the Employment Standards Branch had ever heard of the problem. He speculated that workplace toilet access was not a significant problem in Canada because employers would not take so rigid a stance as their counterparts in the United States had. However, if it became a problem, McCloskey observed that formulating a response would require a major and lengthy policy discussion.<sup>35</sup>

To be sure, in the version of the aforementioned mass-distributed March 1998 Associated Press article on voiding restrictions<sup>36</sup> that appeared in a Toronto newspaper, Belinda Sutton, a spokesperson of the Ontario Ministry of Labour, had said that the building code requires that facilities be available, but does not address the issue of employees' getting time to use them. However, she went on to say: "If people are denied access to bathroom breaks, there are general duty requirements of the Occupational Health and Safety Act that could be used to provide such breaks. How much time in a break would have to be decided on a case-by-case basis."<sup>37</sup> That general duty clause imposes on every covered employer a duty to "take every precaution reasonable in the circumstances for the protection of a worker."<sup>38</sup> When confronted with Sutton's statement four years later, McCloskey observed:

Belinda is correct in that the general duty clause...of our act might well be the mechanism we would consider. There are really two issues here, first, the right to leave the workstation to use the bathroom, and second, whether the employer must pay the worker for the time spent away from the workstation. However, no formal policy has been established on either point. Unofficially, I believe the Ministry would find the kind of situations you described to me unacceptable.<sup>39</sup>

In contrast, OSHA administrators in the United States deemed employers' general duty under the OSHA too narrow to support the imposition of a general duty to make toilets available to workers when they need to use them. That clause provides: "Each employer shall furnish to each of his employees em-

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<sup>35</sup>Telephone interviews with Ed McCloskey (Sept. 9 and 10, 2002).

<sup>36</sup>See above ch. 2.

<sup>37</sup>Maggie Jackson, "On-the-Job Bathroom Breaks Become a Workplace Issue: Some People Risk Being Fired for Using Washroom at Work," *Toronto Star*, Mar. 23, 1998, at D7 (Lexis). In the Yukon Territory, although the law offers no express protection of the right to void at work, if the health and safety authorities received such a complaint, "they would do an employer visit and shame them into ensuring employees were able to use the washroom as required." Email from Lee Ann Campbell, Labour Services Branch, Whitehorse, Yukon, to Marc Linder (Sept. 12, 2002).

<sup>38</sup>Occupational Health and Safety Act, sect. 25(2)(h), Ontario Stat. (2000).

<sup>39</sup>Email from Ed McCloskey to Marc Linder (Sept. 16, 2002).

ployment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees.”<sup>40</sup> Since it would be very difficult to prove that death or serious physical harm would result from a one-time denial of permission to use the toilet, OSHA instead chose to create voiding rights in the promulgated sanitation standard.<sup>41</sup>

The experts’ protestations that Canada was not plagued with the problem to the contrary notwithstanding, even a 1996 survey of working conditions at General Motors, Ford, Chrysler, and CAMI plants in Canada by the powerful Canadian Auto Workers concluded: “Across all four companies, workers found it difficult to find a relief worker so that [they] could go to the washroom.”<sup>42</sup>

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<sup>40</sup>29 USC sect. 654(a)(1) (2000).

<sup>41</sup>The promulgation of standards is controlled by 29 USC sect. 655.

<sup>42</sup>CAW-Canada, *The CAW Working Conditions Study: Benchmarking Auto Assembly Plants* 27 (May 1996). Although the text does specify the washroom, in fact the table, on which it is based, deals with control and autonomy and asks whether the worker “Cannot leave work station.” CAMI Automotive Inc. is GM’s joint venture with Suzuki. For a different account of bathroom breaks under CAW contracts, see below ch. 16.