

April 27, 2010

Slavica Todorovic
Executive Director, Appeals Branch
200 Front Street West
Toronto ON M5V 3J1

Dear Ms. Todorovic:

Re: Appeals System Practice and Procedures Consultation

The Employers' Advocacy Council (EAC) wishes to thank the WSIB for the opportunity to provide our submission on the Appeals System Practice and Procedures Consultation.

Our Policy & Legislative Committee members as well as the EAC members, have reviewed the document released by the WSIB. We have also reviewed the submission provided by the Office of the Employer Adviser (OEA) on this consultation, dated April 13, 2010. At this point, I would like to advise you that the EAC position is fully supportive of the twelve recommendations submitted by Michael Zacks of the OEA and endorses such.

In summary, the EAC recommends that the WSIB clarify in more detail the **processes** that have been informally adopted and in place for a long time. The main concern that the EAC has, is the lack of direction and interpretative guidelines for charter and human rights cases, since it is not supposed to be a precedent based system but one based on **policy**; we believe that a policy on the charter and on human rights is critically required.

On behalf of the EAC and its 400 plus members, I would like to extend our appreciation for the opportunity to provide our views, and look forward to WSIB's positive consideration of this submission.

Respectfully Yours;



Fred Spiro

Executive Director
Employers' Advocacy Council