



EAC, an initiative of Canadian Manufacturers & Exporters

Employers' Advocacy Council

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September 15, 2011

Ms. Alice Peter
Director, Occupational Disease Policy & Research
Workplace Safety and Insurance Board
200 Front Street West
Toronto ON M5V 3J1

By email to alice_peter@wsib.on.ca

Re: EAC Submission – Framework for Policy Development and Renewal

Dear Ms. Peter:

On behalf of the Employers' Advocacy Council (EAC), we wish to thank the Workplace Safety & Insurance Board (WSIB) for the opportunity to provide feedback on the consultation document entitled *Framework For Policy Development and Renewal*.

The EAC is a member-based non-profit employer group with a presence throughout the province of Ontario and an initiative of Canadian Manufacturers & Exporters. The EAC takes great pride in being the leading source of information, training and advocacy on workplace safety insurance. For 26 years, through our advocacy, workshops and safety group program, we work with employers to reduce worker compensation costs, the number of worker claims and to prevent workplace injuries. EAC's vision is to work with employers and eliminate workplace injuries and their costs.

On behalf of the EAC membership, and after reviewing the released draft policy framework, we would like to applaud WSIB for its commitment to introduce clarity, transparency, and quality in the development of Board policies and for a more structured approach to policy development and consultation. EAC also supports the establishment of an annual policy agenda and the review of all policies within the timeframe of five years.

EAC understands that situations could arise that require the adoption of interim policies to fulfill a change in policy direction. While the EAC supports an effective decision-making system that adheres to consistent applications, EAC is concerned that the development and implementation of interim policies could occur without prior stakeholder consultation with the potential to strain the resources of our members.

As a further point in the adoption of interim policies, it is EAC's position that there should be no application of penalty provisions applied to the interim policies until the new policies have been approved, minuted and posted on the WSIB website. Again, EAC wishes to restate the importance of effective stakeholder communication prior to the release of interim policies.

The EAC welcomes WSIB's efforts to engage employers in more meaningful and proactive consultative processes and is willing to assist in the development of key programs that facilitates stakeholder value.

The EAC thanks you for your consideration.

Respectfully yours,

Maria Dagainis
Director, Government Relations & Membership