



EAC, an initiative of Canadian Manufacturers & Exporters

**Employers' Advocacy Council**

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June 15, 2011

Mr. Brian Buchan  
Assistant Director, Communications & Public Affairs Branch  
Workplace Safety and Insurance Board  
200 Front Street West  
Toronto ON M5V 3J1

By email to [brian\\_buchan@wsib.on.ca](mailto:brian_buchan@wsib.on.ca)

**Re: EAC Supplementary Submission - Revised Work Reintegration (WR) Policies**

Dear Mr. Buchan:

The Employers' Advocacy Council (EAC) is pleased to have the opportunity to provide additional feedback on the revised Work Reintegration Policies.

Our Policy & Legislative Committee members have reviewed the revised Work Reintegration Policies that you forwarded on May 4, 2011 to the Chair's Advisory Committee Co-chairs. The EAC has also reviewed the submission provided by the Office of the Employer Adviser (OEA) on this consultation dated May 20, 2011. At this point, I would like to advise you that the EAC position is fully supportive of the recommendations submitted by Michael Zacks of the OEA.

The EAC remains committed to working with the WSIB in the promotion of safe workplaces. The EAC supports the replacement of the word "sustainable" with the words "suitable" and "available." In addition, the EAC is pleased that the WSIB has adopted a comprehensive set of performance measures in order to establish accountability for results throughout the organization.

However, the EAC remains concerned that the WSIB has not removed the reference to the "Ontario Human Rights Code" as noted within the policy framework. The EAC is also concerned that the WSIB has not provided additional clarity to the WR Process under Policy 19-02-01, where it is noted that the "workplace parties are expected to put in place a plan that achieves a return to the pre-injury and/or restores pre-injury earnings where appropriate." The EAC, as noted in its original WR Submission dated February 15, 2011, made the recommendation that the term "where appropriate" be clarified in greater detail by the WSIB.

The EAC respectfully requests that the WSIB consider our supplementary submission responses and thanks you again for your consideration.

Sincerely,

Maria Dagainis,  
Director, Government Relations & Membership