

30 September 2008

Hon. Steve Mahoney, P.C.  
Chair  
Workplace Safety & Insurance Board  
200 Front Street West  
Toronto, Ontario  
M5V 3J1

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Dear Mr. Mahoney:

The Ontario Business Coalition wishes to register some comments regarding the prevention goals of WSIB and the roles of the Safe Workplace Associations (SWA's) in advance of any action on proposals currently under discussion.

First, OBC believes that WSIB has been delegated the power under the WSIB Act to play a leadership role in promoting and facilitating accident prevention but we do not believe that role extends to the delivery of prevention initiatives per se. I believe we need to make it clear that OBC's position is that the SWA's need to be accountable to their respective Sectors through their trade/industry associations, we don't believe that they can serve more than one master

In the view of our members, prevention programs could and should achieve optimal results through the Safe Workplace Associations – but not the SWAs as they are currently operating. OBC members believe there should be a re-examination of the scope and levels of service provided by the SWAs against a fixed standard. We believe there should be a common level of service, funding and accountability across the range of SWAs. The system needs to examine the feasibility of a free service (legislative driven) to be provided by all SWA's at no cost to employers since their service is prepaid through WSIB assessments. If employer wish to purchase a fee for service beyond the basic, than the marketplace should dictate. The SWA's can be part of that, as long as no funds from employers go towards the development of this side of the business since it will provide them with unfair advantage over private providers.

OBC members believe that the governance of SWAs should be standardized to produce effective, efficient and accountable leadership across the economic sectors and across the province. We further believe that a process for the nomination and election of members of Boards of Directors of the SWAs should be transparent and open. This can be achieved by involving employer associations to nominate and support the election process which ultimately will be accountable and representative of the particular sector.

OBC members further believe that the SWAs must be accountable both to WSIB and to their clients. We believe that letters of agreement could be signed by WSIB and each SWA to outline goals yearly. The WSIB allready have a performance letter of

agreement with all SWA's, however, it should also include measurable objectives as to how will the SWA will utilize their resources more effectively through elimination of duplication and collaboration with others within the system. This process could be enhanced to align with the "Road to Zero" campaign and in particular with "Collaboration Across the System". We agree that there is a great opportunity to work together, to eliminate duplication and utilize resultant savings for prevention.

OBC believes that there should be stringent measurement of the operation of each SWA on a yearly basis – by third party evaluators.

These are some of the issues that have been identified by OBC through its participation in the WSIB/OBC working group on Prevention and we feel that they fully support the Road to Zero, particularly in regard to National Habit and Collaboration Across the System.

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OBC looks forward to working collaboratively with you to achieve the goals we all believe in.

Yours sincerely,

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Copy:  
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