



July 17, 2019

Submitted via email: [info@wcbreview.ca](mailto:info@wcbreview.ca)

Ms. Janet Patterson  
Reviewer  
Workers' Compensation System Review  
PO Box 97122 Stn Main  
Richmond BC V6X 8H3

Dear Ms. Patterson,

The Business Council of British Columbia is a signatory to the Employer Community Submission to the Workers' Compensation System Review, recently sent to you under separate cover. As you will note, more than 40 business and industry associations, including the Business Council, have endorsed that Submission. Thus, it is fair to say that the Employer Community Submission reflects a broad consensus across the employer community on many of the issues you are addressing as Reviewer.

The purpose of this short letter is twofold. First, to reinforce our support for the analysis and recommendations in the Employer Community Submission. And second, to provide some additional context.

Regarding the latter point, the Business Council is concerned that the mandate and terms of reference governing your review seem to exclude consideration of the cost impacts of any recommended changes to WorkSafe's policies, practices, services, and regulatory requirements, as well as to the benefits provided to workers. We submit that the financial performance and long-term sustainability of WorkSafeBC is a critical issue that must not be overlooked when policy-makers and the agency's Board are thinking about potential changes to benefits and services. By the same token, the impact of proposed changes to WorkSafeBC benefits, services, and regulatory requirements on the economic health of the employers who cover the costs of the system is also an important topic that warrants careful and ongoing scrutiny by policy-makers and the agency's Board and senior management. That these matters apparently lie outside of the scope of your otherwise wide-ranging review is very troubling and is raising loud alarm bells across the employer community.

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In the coming weeks, the Business Council will be communicating with the B.C. Minister of Labour and other Ministers on the need to control costs and protect the long-term financial integrity of WorkSafeBC, as part of any steps the government may take to introduce changes to the agency's policies, practices, services and benefit levels.

Kindest personal regards,

Sincerely,



Greg D'Avignon  
President and  
Chief Executive Officer



Jock Finlayson  
Executive Vice President  
and Chief Policy Officer

JAF/vjc

cc: Trevor Hughes, Deputy Minister, Labour  
Don Wright, Deputy Minister to the Premier