

July 19, 2019

Ms. Janet Patterson
Reviewer
Workers' Compensation System Review
PO BOX 97122 Stn Main
Richmond, B.C.
V6X 8H3

Via email: Info@wcbreview.ca

Employer Community Submission to the Workers' Compensation System Review

Dear Ms. Patterson:

The Vancouver Regional Construction Association (VRCA) is the largest construction association in British Columbia with a rich history that spans almost 90 years. It serves more than 700 general and trade contractors, manufacturers, suppliers and professional services providers such as architects, engineers, lawyers, accountants and insurance providers, who operate as both union and open-shop employers in the industrial, commercial, institutional and high-rise residential construction industry.

We are pleased to partner with 45 sectoral and cross-sectoral business organizations to endorse the attached Employer Community Submission to the Workers' Compensation System Review ("the Review"). Collectively, we represent small, medium and large businesses in virtually all aspects of B.C.'s economy.

B.C.'s construction industry comprises almost 25,000 small, medium and large companies, employing almost 250,000 men and women and contributing nearly 9 per cent to B.C.'s gross domestic product. Balanced WorkSafeBC policies and practices support healthy, safe and productive workplaces for all.

We understand that the overarching goal of the Review, as announced on March 3, 2019, is to increase the confidence of workers and employers in the workers' compensation system. We also acknowledge that in the Terms of Reference that were subsequently released, you have been tasked with reviewing a number of factors within the system with the stated goal of making the system more worker-centric.

We agree with our 45 business partners that the Terms of Reference of the Review are vague and open to speculation in their interpretation.

Our concerns regarding the lack of specificity are exacerbated by the fact that the report prepared by Mr. Terry Bogyo, which we understand was submitted to the WorkSafeBC Board of Directors in December 2018 ("the Bogyo Report"), and which may be a key input to the Review, has not yet been released in its final form. Further, we are concerned that the compressed timeline set for the Review may compromise the ability to have proper examination and full and meaningful consultation with industry stakeholders such as ourselves.

It is in this context that we urge you to:

- Clearly develop the scope of your focus regarding the issues you intend to consider as set out in Para 1 (a) – (f) of the Terms of Reference;
- Provide the employer community with the specificity of the issues; and
- Allow the employer community reasonable opportunity to provide its perspective and input with respect to the issues.

Please contact me directly at fiona@vrca.ca or at 604.293.6585 if you have questions.

Regards



Fiona Famulak
President

cc: Hon. Harry Bains, Minister of Labour