



July 30, 2019

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

Via email: [Info@wcbreview.ca](mailto:Info@wcbreview.ca)

Dear Ms. Patterson:

By way of background, Independent Contractors and Businesses Association (ICBA) has been the leading voice of B.C.'s construction industry for 44 years, representing more than 2,100 members and clients who collectively employ over 75,000 people. ICBA advocates for its members in support of a vibrant construction industry, responsible resource development, and a growing economy for the benefit of all British Columbians.

On behalf of our broad membership, our organization undertakes public policy development; delivers apprenticeship and professional training; and, provides individual group and retirement benefit programs. Our members are either non-union or non-affiliated union contractors and, taken together, these two segments of B.C.'s construction sector employment account for nearly 85 percent of B.C.'s construction industry workforce.

Please find attached to this communication an Addendum to the Employer Community Submission to the Workers' Compensation System Review organized by the Employers' Forum. Along with the submission from the Employer Community provided to you on July 17, 2019, ICBA also endorses the attached Addendum. We fully concur with the underlying premise of the Addendum that there are no "other urgent compensation issues" within the workers compensation system that need to be addressed.

On a general note, we are very concerned about the scope and timing of your Review of BC's "best in class" workers' compensation system. While BC has experienced relatively sound economic performance over the past few years, there are concerning indications the provincial economy is slowing which has consequences for government revenues and investment returns for WorkSafeBC's portfolio. In the wake of a myriad of provincial tax increases and costly regulatory changes over the past two years, we urge you to refrain from making recommendations for change to the workers' compensation system that could compromise the overall financial viability of WorkSafeBC.

We would be pleased to meet with you to discuss our views in more detail. In the meantime, if you or your review staff have any questions, please do not hesitate to contact me [chris@icba.ca](mailto:chris@icba.ca) or Tim McEwan, Senior Vice President – Policy & Stakeholder Engagement, ICBA, [tim@icba.ca](mailto:tim@icba.ca).

Respectfully submitted,

Independent Contractors and Businesses Association

A handwritten signature in black ink, appearing to read 'Chris Gardner', with a stylized, cursive script.

**Chris Gardner**  
President

CC: Mr. Tim McEwan, Senior Vice President, Policy & Stakeholder Engagement, ICBA  
Mr. Doug Alley, Managing Director, Employers' Forum