

July 22, 2020

The Honourable Harry Bains, MLA  
Minister of Labour  
LBR.Minister@gov.bc.ca

Dear Minister Bains,

**RE: BILL 23: Workers Compensation Amendment Act, 2020**

I'm writing to underscore the concerns expressed in the letter dated July 20 to your attention and signed by the members of the Employers Forum in regard to presumptive coverage. BCCA is a signatory through our membership in COCA, however, this issue is of such great importance that an independent and fully transparent statement of position is warranted.

Rather than reiterate the comprehensive details outlined in the letter dated July 20, I would like to simply make these key points:

1. Businesses are reeling from pandemic-related loss of revenue and unemployment;
2. Bill 23 will add considerable costs to the workers' compensation system and erode the financial stability that has been hard-won over many decades;
3. Bill 23 should not be passed prior to, and in isolation from, BC's broader COVID-19 recovery plan;
4. Bill 23 should not be passed prior to, and in isolation from, the federal government's new sick pay program;
5. Assuming COVID-19 infections are job-related before knowing the facts is contrary to science and all best practises.
6. There has not been sufficient consultation with employers, despite the government's stated goal to involve British Columbians in economic recovery planning.

Unfortunately, all aspects of Bill 23 – from the process to the legislation - undermine the productive and consultative measures that have otherwise been put in place by the BC government to manage the impact of COVID-19.

Now is not the time to introduce measures that increase costs, add to the regulatory burden, or create further uncertainty for BC employers.

We join with our colleagues and urge you to set Bill 23 aside in the interests of a lasting economic recovery for all British Columbians.

Sincerely,



Chris Atchison, President  
BC Construction Association  
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