

October 30, 2019

Honorable Harry Bains
Minister of Labour
Government of British Columbia
c/o Parliament Buildings
Victoria BC V8V 1X4

Submitted via email: LBR.Minister@gov.bc.ca

Dear Minister:

Over the past 18 months, the government has commissioned three reviews of British Columbia's workers' compensation system. These include:

- Review of Rehabilitation and Claims Services by Mr. Paul Petrie;
- Review of Options for the Unappropriated Surplus in the Accident Fund by Mr. Terry Bogoyo; and,
- Review of the Workers' Compensation System by Ms. Janet Patterson.

It is our understanding that Ms. Patterson's report will be submitted to you by October 31. You will recall, the Employer Community (as represented by the undersigned associations) made a comprehensive submission to Ms. Patterson's Review. You will also recall that the Employer Community subsequently voiced our concern about an "apprehension of bias" leading us to withdraw from Ms. Patterson's review process. At the time, we also indicated we believed the nature and scope of issues under consideration had "evolved" beyond the original Terms of Reference you established for Ms. Patterson's review.

The Employers' Forum also recently sent a letter to the Chair of WorkSafeBC (WSBC) and copied you and other senior government officials asking for "structured stakeholder engagement" on Mr. Bogoyo's suggested options for the use of the unappropriated \$2.6 billion surplus in the accident fund. As the letter noted, Mr. Bogoyo conducted very little consultation with the Employer Community, and we had minimal input into the contents of his report. Parenthetically, we understand the findings of Mr. Petrie's report are currently undergoing recommendation-by-recommendation review by the WSBC Policy Bureau prior to implementation.

While we recognize some modest adjustments may be necessary to strengthen the workers' compensation system and bring benefits and rehabilitation services into line with prevailing norms in other jurisdictions, we are acutely mindful of the fact that employers fund the entire workers' compensation system and the imperative to maintain the financial viability of the system. To help maintain stability in the system, we also believe it is important to recognize and plan for the reality that BC's economic performance is deteriorating.

Given the foregoing, the Employer Community urges you to provide stakeholders with a structured opportunity for feedback, framed by a consultation paper, before proceeding with any legislative changes. Fundamentally, we believe any changes to BC's workers' compensation system should be based on a consultation process where all issues can be thoroughly examined and analyzed to ensure there are no unintended consequences. Proposed changes need to be carefully considered and recognize the need to

balance fair compensation and worker rehabilitation programs with the need to maintain the system's overall financial viability.

We look forward to your response to our request at your earliest convenience.

Sincerely,



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Managing Director



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President & CEO



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Vice President,
BC & AB



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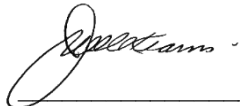


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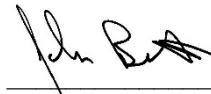



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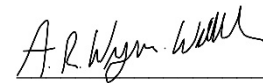



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