

Construction Employers Coalition  
(for WSIB and Health & Safety and Prevention)



January 15, 2018

Via email to: [Consultation\\_Secretariat@wsib.on.ca](mailto:Consultation_Secretariat@wsib.on.ca)

Workplace Safety and Insurance Board  
Consultation Secretariat – Rate Framework Review Policy Consultation  
200 Front Street West, 17<sup>th</sup> Floor,  
Toronto, Ont. M5V 3J1

Reference: Rate Framework Consultation

As outlined in previous consultations related to Rate Framework, the Construction Employers Coalition (CEC) on WSIB Health and Safety and Prevention, represents more than 2,000 firms employing approximately 80,000 workers.

As always, we appreciate the opportunity to provide submissions on an issue that will impact all employers, their employees, and the WSIB for decades to come.

The scale of Rate Framework cannot be overstated. Its complexities as outlined in the Ontario Sewer and Watermain Construction Association submission are unparalleled and this creates tremendous risks for all employers, the WSIB, and all workers on a going forward basis. Reaching out to CEC members and their individual association members, general confusion is wide spread. For construction employers, the shift from thirteen to five rate groups has raised numerous questions including issues related to predictability and attempts by the WSIB to identify single vs. multi-rated employers through a letter writing campaign.

While there is no doubt that extensive work has gone into Rate Framework, each policy regardless of scale, requires constant evaluation. In the case of Rate Framework, the massive impact and scope requires additional consideration. Any and all changes that can be classified as periphery should be delayed. In other words, Rate Framework should focus solely on changes that are absolutely necessary. All non-core changes should be delayed. This will simplify implementation for the WSIB and employers reducing unintended consequences associated with change and implementation.

As a result, the CEC has two additional recommendations:

1. The CEC lends support to the positions as outlined by L.A. Liversidge to Kate Lamb on October 6<sup>th</sup>, 2017.
2. The CEC requests that the WSIB release and discuss the revised Rate Framework policies with the CAGs before they are publicly released. This will allow for a final discussion and forum to further review any changes before implementation.

As always, CEC appreciates having the opportunity to provide input into this consultation process.

If you have any questions or require information regarding CEC and its membership, please contact David Frame [david@ogca.ca](mailto:david@ogca.ca)

Sincerely,  
Construction Employers Coalition

David Frame, Chair