

February 25, 2026
Winnipeg, Manitoba

WCB Manitoba
Attn: Legislative Review of WCB

Re: Proposed WCB policy requiring enclosed, mechanically ventilated spray-booth controls for automotive collision repair and refinishing operations

To Whom It May Concern,

I am writing to formally request that the Workers Compensation Board of Manitoba adopt (or sponsor through the appropriate regulatory and enforcement channels) a clear prevention policy requiring that **all spraying of automotive-grade paints, coatings, and volatile organic solvents** in collision repair, vehicle painting, and related repair workplaces be conducted **only in an enclosed, mechanically ventilated, safety-approved spray booth (or spray room/spray area designed to an equivalent standard)**.

1) Executive summary of the issue

Across Manitoba, automotive refinishing and solvent spraying is occurring in open shop areas and improvised spaces where workers and nearby staff are exposed to **paint mists and solvent vapours** without adequate engineering controls. These exposures are preventable. The minimum effective, industry-recognized engineering control is an enclosed, mechanically ventilated spray booth/spray room that exhausts to the outdoors and uses appropriate filtration.

WCB already emphasizes that where hazardous chemicals are present, employers must use appropriate control measures under **Part 36 – Chemical and Biological Substances** of the Manitoba Workplace Safety and Health Regulation. () This submission asks WCB to make the expected standard explicit for automotive spraying: **no spraying outside an approved ventilated enclosure**.

2) Requested action from WCB Manitoba

I respectfully request WCB Manitoba:

1. **Issue a WCB prevention policy/position statement** specifying that automotive spray application of coatings and aerosolized solvent products must occur only in approved enclosed, mechanically ventilated spray booths/rooms/areas.
2. **Integrate this requirement into prevention inspections and guidance** for collision repair and refinishing workplaces (including small shops).
3. **Adopt a phased compliance approach** that immediately stops open-area spraying while allowing time for booth installation or formal sublet arrangements.

3) Proposed policy statement (draft wording)

Proposed WCB Policy – Automotive Spray Operations (Collision Repair & Refinishing)

3.1 Scope

This policy applies to all Manitoba workplaces engaged in collision repair, vehicle painting, refinishing, or any activity involving spray application of automotive-grade coatings.

3.2 Requirement

All spray application of automotive-grade paints/coatings (including primers, basecoats, clearcoats, single-stage paints, bedliners, undercoats, and similar products) and all spraying/aerosolizing of solvent-based cleaners, thinners, reducers, and other volatile organic compounds must be performed **only within**:

- a **fixed, enclosed, mechanically ventilated spray booth**, or
- a **dedicated spray room/spray area** that provides equivalent enclosure and mechanical exhaust performance, and meets applicable code requirements.

3.3 Minimum performance expectations

The spray enclosure must, at minimum:

- provide **mechanical exhaust ventilation** during spray operations and clearance time;
- **exhaust to the outdoors** in a manner that limits worker exposure and avoids re-entrainment to occupied areas; and
- be maintained and operated in accordance with manufacturer specifications and applicable code expectations for spray operations. Guidance used for high-hazard spray operations commonly describes booths as enclosed/semi-enclosed with major components including an exhaust system and separation of spray operations from the remainder of the building. ()

3.4 Employer obligations

Employers must maintain written procedures and training related to:

- chemical hazard identification and controls, consistent with Part 36 expectations (risk assessment, control measures, training). ()
- booth operation, inspection, and maintenance (including filter changes and ventilation functionality).

3.5 Prohibition

Spray application of automotive-grade coatings or aerosolized solvent products in open shop areas, makeshift enclosures, or non-ventilated rooms is prohibited.

4) Rationale (worker health, fire, and prevention consistency)

- **Worker health:** Automotive paints and solvents can generate airborne chemical exposures and mists that require control measures under Part 36. WCB's chemical-substances guidance outlines the need for appropriate controls and training where hazardous chemicals exist. ()

- **Fire and life safety:** Spray operations are widely treated as high-hazard processes requiring isolation and engineered controls; guidance for high-hazard inspections includes detailed discussion of spray booth components and separation from the remainder of the building. ()
- **Clarity and consistency:** A simple WCB rule—“spray only in approved ventilated enclosures”—will reduce variation in interpretation and close the gap where some workplaces continue unsafe spraying practices.

5) Practical implementation (recommended phase-in)

To rapidly reduce exposure while enabling compliance for small operators, I recommend:

- **Immediate (0–30 days):** Stop open-area spraying. Where no booth exists, spraying must cease or be sublet to a compliant facility.
- **Transition (31–180 days):** Installation/commissioning of compliant booth/spray room/spray area or documented permanent sublet arrangement for all spray operations.
- **Full compliance (6–12 months):** Verified compliance through inspection and maintenance documentation.

6) Closing

This is a preventable exposure problem with a clear and achievable solution. A WCB policy requiring the use of approved ventilated booths for spraying automotive-grade coatings and solvents will materially reduce worker risk and improve province-wide consistency in prevention expectations.

Thank you for considering this submission. I would welcome the opportunity to provide additional industry observations, participate in consultations, or support development of guidance materials for employers.

Sincerely,

Joe Bradbury

[Redacted Signature]

cc. Malaya Marcelino, MLA Labour and Immigration