

Dear Members of the Legislative Review Committee,

Thank you for the opportunity to contribute to the review of *The Workers Compensation Act*.

The Industry-Based Safety Program (IBSP) Council represents Manitoba's six sector-based safety associations, collectively supporting over 20,500 employers across the province. Through direct, on-the-ground engagement with industry, IBSPs play a critical role in delivering prevention programming, strengthening safety culture, and reducing workplace injuries.

As reflected in the individual submissions attached, there is strong alignment across IBSPs on a key priority:

Strengthening the governance connection between prevention and the WCB Board.

Prevention is a core pillar of Manitoba's workers' compensation system. Yet, under the current model, the Prevention Advisory Council operates without a direct governance link to the Board. This disconnect limits the Board's visibility into real-time prevention challenges and opportunities, weakens alignment between strategy and delivery, and creates unnecessary barriers between those doing the work and those making decisions.

To address this, the IBSP Council recommends:

- Establishing a Board-led Prevention Committee as a formal committee of the WCB Board
- Ensuring the committee is chaired by a Board member
- Enabling participation from key prevention partners, including IBSPs, to provide sector-based expertise

A Board-led prevention committee would:

- Strengthen alignment between prevention activities and governance
- Improve direct communication between prevention partners and decision-makers
- Enhance transparency and accountability
- Reinforce prevention as a core strategic priority of the WCB

In addition, IBSP submissions consistently support formal recognition of IBSPs within the Act as key prevention partners, reflecting the important role these programs play in delivering sector-specific safety outcomes across Manitoba.

Together, these recommendations reflect a shared, system-wide perspective: a more connected, governance-aligned prevention model will strengthen outcomes for workers, employers, and the broader compensation system.

Thank you for your consideration of this submission and the attached IBSP letters. We would welcome the opportunity to discuss these recommendations further.

Sincerely,



Jacquelyn Oduro  
IBSP Council Chair

On behalf of the IBSP Council

**Subject: Strengthening Manitoba's Prevention Framework – WCB Act Review Submission**

Dear Legislative Review Committee,

Thank you for the opportunity to contribute to the review of the Workers Compensation Board (WCB) Act. This review presents an important opportunity to strengthen Manitoba's prevention framework by building on what is already working well and ensuring the legislation reflects the collaborative, partnership-driven model that defines our system today.

The following recommendations are offered in the spirit of enhancing alignment, improving communication, and reinforcing prevention as a shared responsibility across all system partners.

**1. Strengthening Governance Through the Prevention Advisory Council**

Section 54.2(1) currently establishes the Prevention Advisory Council while prohibiting members of the WCB Board of Directors from serving on it. While the intent of balanced representation is clear, this restriction unintentionally creates a gap between prevention discussions and governance decision-making.

**Recommendation:** Amend this section and other provisions of the Act as required to mandate and allow the WCB Board of Directors to establish its own Prevention Committee, with tripartite representation, chaired by a member of the Board. Its terms of reference should contemplate and allow membership to include external subject matter experts to assist in the Prevention Committee deliberations. This was the case with the first Prevention Committee prior to amendments to the WCB Act, and is/was the case with a number of WCB Board Committees.

**Why This Matters:** Manitoba's prevention system is built on collaboration. Creating a direct connection between the Council and the Board would:

- Foster stronger alignment between prevention priorities and governance oversight
- Enable more direct and meaningful communication between prevention partners and decision-makers
- Elevate prevention within Board-level discussions and strategic planning
- Improve transparency and accountability in how prevention insights are considered
- Reduce barriers created by indirect communication pathways

This change is not about altering representation – it is about strengthening connection. Worker, employer, and public interest voices would remain central, while the addition of a Board link would help ensure those voices are more directly reflected in decision-making.

Ultimately, this amendment would reinforce prevention as a core pillar of the WCB's mandate and strengthen the shared accountability that underpins Manitoba's prevention model.

## 2. Recognizing Industry-Based Safety Programs as Essential Prevention Partners

Section 54.1(2) outlines WCB's role in prevention and collaboration; however, it does not explicitly recognize Industry-Based Safety Programs (IBSPs), despite their critical role in delivering sector-specific prevention services across Manitoba.

**Recommendation:** Amend Section 54.1(2) to formally recognize IBSPs as key partners and to embed structured collaboration between WCB, SAFE Work Manitoba, and IBSPs in prevention activities.

**Why This Matters:** IBSPs bring industry expertise, trusted relationships, and practical knowledge that are essential to effective prevention. Formal recognition would:

- Align legislation with how prevention is already delivered in practice
- Strengthen collaboration across WCB, SAFE Work Manitoba, and industry partners
- Ensure prevention strategies are tailored to sector-specific risks and realities
- Support consistency, clarity, and long-term stability in prevention partnerships
- Enhance the development of training, standards, and certification processes through industry insight
- Improve the effectiveness of prevention incentives and programs

Embedding IBSPs within the Act acknowledges the value of shared expertise and reinforces a coordinated approach to reducing workplace injuries and illnesses.

### Moving Forward Together

These recommendations are grounded in a shared goal: a stronger, more connected prevention system that continues to deliver meaningful results for Manitoba workers and employers.

By creating a clearer governance link between prevention and the WCB Board and formally recognizing the role of IBSPs in prevention activities, the WCB Act can better reflect and support the collaborative system already in place.

We believe these changes will enhance alignment, strengthen partnerships, and ensure prevention remains at the forefront of Manitoba's workers' compensation system.

Thank you for the opportunity to provide input into this important review. I would welcome any opportunity to further discuss these recommendations.

Sincerely,



Sean Scott  
Executive Director,  
Construction Safety Association of Manitoba  
sean@constructionsafety.ca 204-775-3171

cc. William Gardner, Chair, Manitoba Employers Council (MEC)  
Ron Hambley, President, Winnipeg Construction Association  
IBSP Council

**S2SA / MMDA Submission: The Workers Compensation Act Legislative Review 2025-2026**

*Prepared by Lee Rosenberg, Safety Program Director, S2SA*

*Submitted March 26, 2026, via the WCB Legislative Review submission portal*

***To the Members of the Legislative Review Committee:***

S2SA is an industry-based safety program serving the sales and service sector in Manitoba. We are committed to advancing workplace safety and health through injury prevention, education, and employer support. In my role as Safety Program Director, I am submitting the following feedback to support the Legislative Review Committee's review of *The Workers Compensation Act*, drawing on S2SA's practical experience in preventing workplace injuries and supporting Manitoba workplaces.

Please accept the following submission for your consideration as part of the Workers Compensation Act review.

**1. Submission on Section 54.1 (2): Prevention Activities**

We recommend that the Workers Compensation Act be amended to formally recognize Industry-Based Safety Programs (IBSPs) as official prevention partners of the Workers Compensation Board (WCB). IBSPs are a critical component of Manitoba's prevention system, providing sector-specific expertise and direct support to employers across the province. Their work in hazard identification, risk mitigation, and sector-tailored safety practices makes them indispensable contributors to improved prevention outcomes.

IBSPs maintain strong, ongoing relationships with employers in their respective industries and play a key role in building practical, workplace-level capacity for hazard recognition and control. Formalizing their role within the WCB's prevention framework would strengthen collaboration, enhance alignment of prevention activities, and support more effective injury-reduction strategies across all sectors.

This recommendation aligns with Manitoba's Prevention Charter, which was developed collaboratively by the WCB, IBSPs, and other system stakeholders. Recognizing IBSPs in legislation would reinforce a shared commitment to coordinated, evidence-based prevention efforts and ensure they remain integral partners in advancing workplace safety throughout Manitoba.

By not formally recognizing collaboration with IBSPs in the WCB Act, a key prevention partner is omitted from the statutory framework. This omission creates a structural gap between the Act and the way prevention services are currently delivered in Manitoba. Formally acknowledging the IBSP role in legislation is essential to ensure that prevention activities across the province are

consistent, coordinated, and aligned. Embedding IBSPs within the Act would help guarantee that all Manitobans receive clear, unified, and evidence-based prevention messaging, regardless of sector. This recognition would strengthen system integration and reinforce Manitoba's broader prevention strategy.

### **Proposed Legislative Language for Section 54.1(2)**

(proposed revisions shown in red)

#### Prevention activities

54.1(2) In order to promote safety and health in workplaces and to prevent and reduce the occurrence of workplace injury and illness, the board must, in co-operation with the **Industry Based Safety Programs (IBSPs)**, department and the branch,

- (a) **Collaboratively** promote public awareness of workplace safety and health and injury and illness prevention;
- (b) promote an understanding of and compliance with this Act and *The Workplace Safety and Health Act* **utilizing and collaborating with the Industry Based Safety Programs (IBSPs) and other relevant stakeholders to support their knowledge and expertise;**
- (c) foster commitment to workplace safety and health and to injury and illness prevention among employers, workers and other persons;
- (d) work with organizations engaged in workplace injury and illness prevention to promote workplace safety and health **in collaboration with their Industry Based Safety Programs (IBSPs);**
- (e) provide training and education about preventing workplace injury and illness **in collaboration with the Industry Based Safety Programs (IBSPs);**
- (f) develop standards for workplace safety and health and training programs, including certification processes for providers **in collaboration with the Industry Based Safety Programs (IBSPs);**
- (g) publish reports, studies or recommendations about workplace safety and health and injury and illness prevention.

## **2. Submission on Section 54.2 (1): Prevention Advisory Council**

Our submission recommends two key amendments to the legislation governing the Prevention Advisory Council:

1. Removal of the clause *“none of whom is a board member”*; and
2. Addition of IBSP Council representation as a designated member category.

These amendments are essential to strengthen representation, improve transparency, and more effectively support Manitoba’s workplace injury and illness prevention objectives.

Including WCB Board representation on the Prevention Advisory Council would create a direct and meaningful link between the Board and its prevention advisory structure. This connection ensures the Board receives first-hand insight into prevention activities, priorities, and emerging trends. Without this link, the Board lacks an accurate understanding of on-the-ground prevention work and is effectively excluded from critical prevention discussions. If the goal is to reduce injury and illness in Manitoba, leaving out a key system partner is counterproductive.

Transparency and accountability are also central to this recommendation. Excluding WCB Board members from the Council creates the potential for unnecessary communication gaps, resulting in misalignment and weakened collaboration between two essential prevention partners. Removing this restriction will promote more integrated governance and support a cohesive, well-coordinated prevention system.

We also recommend formally adding Industry-Based Safety Program (IBSP) Council representation to the Prevention Advisory Council. The IBSP Council includes all six IBSPs operating in Manitoba:

- Construction Safety Association of Manitoba (CSAM)
- Sales and Service Safety Association (S2SA)
- Made Safe (Manufacturing)
- RPM (Trucking)
- Manitoba Heavy Construction Association WORKSAFELY (MHCA)
- Manitoba Association for Safety in Healthcare (MASH)

IBSPs play a critical role in preventing workplace injuries and illnesses province-wide. They work in close partnership with the WCB and SAFE Work Manitoba, providing sector-specific expertise and helping employers create safer workplaces. Their “boots-on-the-ground” connection to industry gives them practical insight into real-time health and safety needs. Including IBSP representation

on the Prevention Advisory Council ensures that this essential perspective consistently informs provincial prevention planning, coordination, and decision-making.

**Proposed Legislative Language for Section 54.2 (1)**

(proposed revisions shown in red)

Prevention advisory council

54.2(1) The Board of Directors must, by law, establish a prevention advisory council consisting of

- (a) a chair;
- (b) three members representative of the interests of workers;
- (c) three members representative of the interests of employers; and
- (d) three members representative of the public interest;

~~none of whom is a board member.~~

**(e) one member representative of the Industry Based Safety Programs (IBSP) Council**

Together, these amendments would create a more transparent, integrated, and representative prevention governance structure—one that reflects the full range of Manitoba's prevention partners and better supports the shared goal of reducing workplace injuries and illnesses for all Manitobans.

Thank you for the opportunity to submit our response. We would welcome the opportunity to discuss these submissions further.



Geoff Sine, Executive Director, Manitoba Motor Dealers Association (MMDA)



Lee Rosenberg, Safety Program Director, Sales and Service Safety Association (S2SA)

CC William Gardner, Chair Manitoba Employers Council  
IBSP Council  
MMDA Board of Directors

March 31, 2026

To the Members of the Legislative Review Committee,

As you may know, Canadian Manufacturers & Exporters (CME) is a nonprofit, membership-based organization dedicated to helping manufacturers grow. For over 150 years, CME has been the voice of manufacturing in Canada, shaping policies and programs that support the sector.

CME offers programs that address productivity, workforce challenges, trade and supply chain competitiveness, and health and safety.

Made Safe is an initiative of CME Manitoba, in partnership with the Workers Compensation Board of Manitoba (WCB) and serves as Manitoba's manufacturing safety association. We provide safety training, consulting, audits, certification support, and help manufacturers become SAFE Work Certified.

This submission reflects feedback from Manitoba manufacturers and the Made Safe program on the Workers Compensation Act Review.

#### Workers Fairness and Coverage

- Limit employer liability to hazards known at time of employment and prevent retroactive liability for risks discovered decades later.
- Align salary indexation with inflation quarterly and annually.
- Review safety standards (air quality, machine guarding) for practicality and compliance balance.
- Extend WCB coverage for workers abroad in globally connected industries.
- Increase investigation into long-term claims and strengthen fraud prevention measures.
- Expand return-to-work programs, physician training on early reintegration, and allow employer-requested second medical opinions.
- Enable online reporting for workers; standardize PCA/RTW forms and ensure consistent medical training.
- Examine overlaps between Workplace Safety and Health Division and WCB.

#### Individually Assessed Employers

- Introduce greater immediacy in risk-based assessments.
- Regular evaluations with performance scoring for companies. Higher-risk employers should carry greater cost responsibility.

#### Emerging Issues

- Address global operations, recurring and ergonomic injuries, and rising mental health claims.
- Recognize competitive pressures from jurisdictions with lower employer burdens as trade shifts



CANADIAN  
MANUFACTURERS  
& EXPORTERS



**MADE SAFE**

Manufacturing Safety for Manitoba

away from the USA.

- Manage risks from physician-issued excessive time off and reluctance by employees to report injuries.
- Support adaptation to artificial intelligence and new technologies through training; reduce stress-related claims.
- Use AI tools to improve system efficiency; conduct deeper audits on repeat claimants.

#### Mental Health

- Maintain current coverage model and increase clarity on overall WCB performance and premium use.
- Limited feedback from members suggests adequacy but ongoing monitoring is recommended.

#### Occupational Disease Claims

- Retain the dominant cause standard for both presumption-covered and non-covered claims.

#### Wage Loss Benefits

- Ensure dependent children receive benefits in the event of a worker's death.
- Clarify provisions to say "shall receive" rather than "may receive," especially when the worker had medical benefits through their employer.

#### Healthcare Advisors

- No changes recommended to the current role or policy.

#### Injury & Illness Prevention

- Expand injury and illness prevention programming delivered through Made Safe to support WCB's broader prevention mandate.

CME remains committed to working constructively to ensure Manitoba's workers compensation system remains fair, sustainable, competitive, and responsive to modern workplace realities.

We look forward to continued engagement as this review progresses and the opportunity to collaborate on policy design, implementation strategies, and engagement with industry to achieve outcomes that protect workers, promote employer fairness, and support the growth and competitiveness of manufacturing in Manitoba.

Sincerely,



Jillian Einarson  
Vice President, Policy & Government Relations, Prairies  
Canadian Manufacturers & Exporters



# Formal Submission to the Legislative Review Committee

from the

Manitoba Trucking Association

**March 2026**

Please forward comments or questions to:

David Linton, Manager of Policy

[dlinton@trucking.mb.ca](mailto:dlinton@trucking.mb.ca)

MTA member companies employ more than 10,000 people and operate approximately seventy five percent of the for-hire commercial trucks licensed in Manitoba. Trucking companies in the province generate roughly four billion dollars in annual revenue and play an essential role in enabling local, national and international trade across agriculture, processing, manufacturing and consumer focused industries. The Manitoba Trucking Association exists to advocate, support and educate in order to ensure a safe, healthy, and efficient business environment for the trucking industry.

The Manitoba Trucking Association is grateful for the opportunity to respond to the consultation questions set out in the Committee's call for submissions. The trucking industry depends on a workers compensation system that is fair, predictable and responsive to the realities of our sector. Our submission reflects the operational experience of Manitoba carriers along with insights provided through the RPM Safety Council. Our goal is to assist the Committee in developing recommendations that reinforce safety, accountability and effective return to work outcomes in Manitoba.

### **Fairness and Adequacy of the Current System**

The Manitoba Trucking Association believes that fairness within the workers compensation system depends on the timely and reliable administration of claims. Our members consistently encounter delays when attempting to secure functional ability forms or to obtain approval for modified duties. These delays result in unnecessary lost time, which affects worker income stability and employer operations.

The trucking industry requires a claims administration system that can provide prompt return-to-work guidance because prolonged absences create significant operational challenges. For this reason, we recommend that the Workers Compensation Board establish a set of pre-approved modified work tasks for common injury types. This approach would allow employers to place injured workers into safe and appropriate transitional duties immediately, while formal documentation is being finalized. This recommendation reflects concerns expressed by members who noted that administrative delays are a recurring cause of lost time in our sector.

Fairness within the workers compensation system also requires clarity and equity in how coverage is applied to owner operators in the trucking industry. Manitoba's current process for determining whether an owner operator should be classified as a worker, or as an independent contractor who must obtain their own Workers Compensation Board coverage, is not sufficiently clear. This lack of clarity creates uncertainty for employers, who must make classification decisions that carry significant financial and legal implications. It also creates conditions in which bad actors can exploit the system for financial gain.

The Manitoba Trucking Association believes that the Workers Compensation Board should provide a clearer, more transparent and consistently applied framework for distinguishing an owner operator from a worker. This could include detailed guidance materials, simplified assessment tools, sector specific examples, and direct support for employers seeking clarification. A clearer process would help ensure that coverage decisions are applied correctly, thereby reducing administrative disputes and promoting fairness for both carriers and contractors who rely on predictable and understandable standards.

An additional fairness issue relates to the continued use of the Manitoba Public Insurance Personal Injury Protection Plan for vehicular accident-related work injuries. Allowing workplace injuries to be diverted to a system managed by Manitoba Public Insurance creates inconsistencies in claim handling and reduces employer involvement in return-to-work efforts. Our members note that this arrangement also creates

opportunities for inappropriate claim suppression, and for the under reporting of payroll to the Workers Compensation Board, both of which undermine overall system integrity.

The Manitoba Trucking Association recommends that all workplace injuries reported to Manitoba Public Insurance should also be reported to the Workers Compensation Board. We further recommend that the Workers Compensation Board work with Manitoba Public Insurance to evaluate and improve the gaps between Personal Injury Protection Plan coverage and Workers Compensation Board coverage to ensure that all work-related injuries are managed consistently and effectively.

### **Distribution of Surplus Funds**

The Manitoba Trucking Association requests that the Province legislate mandatory rebates of Accident Fund surpluses whenever the fund exceeds the ratio target of 130 percent. The WCB's Funding Policy confirms that the Accident Fund is fully funded at 100 percent and that the additional thirty percent reserve is intended to protect the system from financial risk and market volatility. When the fund surpasses this threshold target, the policy allows the Board to issue a surplus distribution, but only at its discretion.

The Manitoba Trucking Association believes that funds above the 130 percent threshold represent employer overpayments and should be returned automatically. A legislated requirement would ensure fairness and predictability for employers who fully fund the system and have already paid for all current and future liabilities, including the reserve set aside for risk.

It is understood that the Workers Compensation Board requires discretion to manage financial uncertainty or to address future system investments and improvements. However, the thirty percent reserve already exists for this purpose and was designed specifically to ensure long term system stability.

For these reasons, the Manitoba Trucking Association urges the Committee to recommend legislative amendments requiring that any funding ratio above 130 percent shall automatically trigger a surplus rebate to employers, ensuring fairness, transparency and consistency while preserving full system stability.

### **Compliance and Administrative Penalties**

The Manitoba Trucking Association supports the Committee's interest in examining whether the current compliance framework provides an adequate deterrent to noncompliance. Penalties must be proportionate to both the seriousness and the financial impact of the noncompliant action.

The Manitoba Trucking Association is aware of more than one hundred and nine million dollars in underreported payroll within Manitoba's trucking industry. In these cases, the total administrative penalties assessed amounted to just over two hundred thousand dollars, representing less than one percent of the underreported amount. When penalties are this small relative to the financial benefit of noncompliance, the economic incentive to break the law far outweighs the consequences of being caught. This is why some companies have underreported payroll in Manitoba by tens of millions of dollars.

Underreporting payroll creates significant harm to the Workers Compensation Board system, and the consequences extend far beyond individual companies. It results in unfair cost shifting because employers who underreport payroll are not paying their fair share of assessments. This forces compliant employers



to subsidize the system. It also distorts rate setting because premiums rely on accurate payroll and claims data. Underreporting skews this information and undermines the integrity of the rate model. System sustainability is reduced because the Workers Compensation Board depends on accurate reporting to ensure that funds are available to support injured workers.

Underreporting weakens that foundation by reducing available resources. It creates unfair competitive advantages because companies that underreport payroll gain an artificial cost advantage over compliant employers. This rewards noncompliance and pressures the market toward lower standards. Finally, it poses risks to workers because misrepresented payroll or worker misclassifications can create delays and complications in accessing benefits, which undermines the purpose of the workers compensation system.

The current penalties do not carry sufficient weight to influence behaviour. A penalty structure based on a percentage of the cost or impact of the noncompliant event would more accurately reflect the seriousness of failing to meet obligations. In addition, escalating penalties for repeated violations would help ensure that compliance is treated as a meaningful responsibility rather than a routine administrative formality.

### **Effectiveness of the Injury Prevention Model**

The Manitoba Trucking Association strongly supports the continuation of the industry-based safety program model. The RPM Trucking Industry Safety program provides employers in the trucking sector with essential guidance, training resources, and Safe Work Certification that strengthen health and safety practices. These programs play an important role in reducing preventable injuries and improving operational consistency. Experience within the trucking industry has shown that companies in Manitoba that have achieved SAFE Work Certification are experiencing a 20.2 percent lower premium rate overall compared to trucking companies that have not achieved certification. This improvement reflects injury experience that clearly demonstrates the positive impact SAFE Work Certification is having on workplace safety within Manitoba's trucking industry. Our members emphasize that these supports are valuable in promoting safer workplaces and directly contribute to reducing injury severity and frequency. The Association urges the Committee to continue supporting this model and to consider expanding it where possible.

The Manitoba Trucking Association also recommends that the Workers Compensation Board reinstate the Prevention Committee of the Board. Before the current structure of the Prevention Advisory Committee, the previous committee reported directly to the Workers Compensation Board and provided valuable transparency for both industry and labour. As injury prevention continues to be a core mandate of the Workers Compensation Board, there should be a fair and transparent process for governing prevention activities at the Board level. The current Prevention Advisory Council functions by providing advice to SAFE Work Manitoba, not the WCB creating a gap when prevention programming is a board priority.

### **Conclusion**

The Manitoba Trucking Association appreciates the Committee's work and the opportunity to provide direct responses to the consultation questions. The recommendations in this submission reflect the operational realities of Manitoba's trucking industry and the insights of our members. Our priority is a workers compensation system that supports injured workers, ensures fairness for employers and



reinforces a strong culture of safety across Manitoba. We remain available to provide further information or participate in additional dialogue as the review progresses.





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March 30, 2026

Workers Compensation Act Review Committee  
Workers Compensation Board of Manitoba

Dear Members of the Review Committee,

Thank you for the opportunity to provide input as part of the review of *The Workers Compensation Act*, (the Act')

The Manitoba Heavy Construction Association (MHCA), through its WorkSafely program, is committed to advancing workplace injury and illness prevention across Manitoba. We support workers and employers through a robust, Industry-Based Safety Program (IBSP) that is continually evolving to meet changing market conditions and workplace realities.

For more than 35 years, WorkSafely has been delivered under successive agreements between MHCA and the Workers Compensation Board (WCB). Over that time, our industry has seen significant improvements in workplace safety practices, a strengthened safety culture, and the establishment of SAFE Work Manitoba, which promotes the Industry-Based Safety Program (IBSP) model. While this progress is substantial, continued evolution is essential in today's changing work environment.

Our submission focuses on strengthening the direct connection between the WCB Board and workplace injury prevention. This includes prevention programming, delivery, outcomes, and growth in COR certification. These elements collectively support continuous improvement in safety practices and culture, and contribute to sustained reductions in the frequency, duration, and severity of workplace injuries.

Under the WCB's current governance model, the Act requires the Board to establish an Audit Committee and permits the establishment of additional committees as deemed necessary. In practice, the Board has established committees for governance, investment, finance, and audit. The Act also allows the appointment of non-Board members to these committees to bring forward subject-matter expertise.

In this context, it is not clear why prevention, being a foundational element of the WCB's mandate, is not governed through a Board committee in the same manner. As prevention continues to be identified as a critical priority for reducing workplace injuries and associated system costs, there is a clear opportunity and overall governance need to align its governance with other core functions of the Board.

A key recommendation of ours is to re-establish and enhance a Board-led prevention committee. This would immediately strengthen the connection between prevention partners and the WCB. It would reinforce prevention as a core function of the system - complemented by effective safe return-to-work practices when injuries occur. This would also build upon and strengthen the completed Prevention Charter exercise.

#### **1. Prevention Advisory Council – Establish as a Committee of the Board**

We recommend amending or repealing existing language in the Act which currently precludes the Board from either establishing its own Prevention Committee of the Board and/or Board member participation on a Prevention Advisory Council/Committee.

Instead, the Act should proactively mandate that a Prevention Committee be established by the Board with terms of reference and membership being established within the discretion of the WCB Board as is generally the case with its existing committees.

Specifically, we propose:

- Establishing the body as a formal committee of the WCB Board
- Requiring the committee to be chaired by a member of the Board

Under the current legislation, the Prevention Advisory Council operates without a direct governance link to the Board. As a result, prevention discussions are not fully integrated into Board-level oversight.

This creates several challenges including:

- Limited integration of prevention perspectives into governance
- Reduced visibility of prevention priorities at the Board level
- Indirect communication between prevention partners and decision-makers
- Additional layers between discussion and action

Prevention is a foundational pillar of Manitoba's workers' compensation system. Establishing a Board-level Prevention Committee would ensure that system insights, partner perspectives, and prevention priorities are communicated directly to the governing body. It would also provide a forum to further strengthen safe return-to-work practices for Board consideration.

These changes would:

- Strengthening alignment between prevention activities and governance
- Improve communication with prevention partners
- Reinforce prevention as a strategic priority
- Enhance transparency and accountability
- Benefit all workplace safety stakeholders

## **2. Representation of Prevention Partners**

The WCB Board's Prevention Committee should include subject matter expertise from key prevention partners.

Balanced representation could include:

- Industry-Based Safety Program (IBSP) Council
- SAFE Work Manitoba / Workplace Safety and Health Branch
- Organized labour (e.g., Manitoba Federation of Labour)
- Employer representatives (e.g., Manitoba Employers Council)
- Public interest representatives

IBSPs play a central role in Manitoba's prevention system by delivering sector-specific training, certification programs, and safety resources. The same rationale applies to organized labour as a key stakeholder. Including such prevention partners at the Board committee level will strengthen collaboration and provide direct insight into prevention efforts across sectors.

This structure reinforces Manitoba's collaborative prevention model, as reflected in the Prevention Charter, and ensures that worker, employer, and partner perspectives are directly connected to WCB governance.



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### 3. Recognition of Industry-Based Safety Programs

We recommend amending Section 54.1(2) to formally recognize IBSPs as partners in prevention activities undertaken by the WCB, in collaboration with SAFE Work Manitoba.

IBSPs already play a well-established role by:

- Delivering sector-specific training and education
- Supporting workplace safety and health management systems
- Administering certification programs such as SAFE Work Certified
- Developing industry-informed resources and standards

Formal recognition in the Act would align legislation with current practice and strengthen coordination across Manitoba's prevention system.

### Conclusion

Manitoba benefits from a strong and collaborative prevention system. The recommendations outlined above will further strengthen the WCB system by improving governance alignment and reinforcing the central role of prevention and its partners.

These recommendations are consistent with the findings and direction of the Prevention Charter partnership framework.

Thank you for the opportunity to provide this submission.

We would welcome the opportunity to discuss these recommendations further.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Oduro'.

Jacquelyn Oduro  
MHCA WorkSafely Program Director

cc William Gardner, Chair Manitoba Employers Council (MEC)  
IBSP Council  
MHCA Board of Directors

**March 31, 2026**

**Subject: WCB Act Review**

**Dear Members of the Workers Compensation Act review committee:**

Thank you for the opportunity to provide input into the review of the Workers Compensation Act.

The Manitoba Association for Safety in Healthcare (MASH) is dedicated to partnering with the healthcare sector to reduce workplace injuries and foster psychologically safe environments across Manitoba. By integrating multiple data sources—including workers' compensation data—MASH identifies trends, informs decision-making, and supports the development of targeted safety and health initiatives. Through this industry-based safety program, MASH works to prevent injuries and illnesses and strengthen safety performance throughout the healthcare system.

The following input is provided to support a collaborative approach to aligning prevention efforts among all stakeholders.

## **1. Prevention Advisory Council – Governance Alignment**

### **Recommendation:**

Amend Section 54.2(1) to remove the restriction prohibiting WCB Board members from serving on the Prevention Advisory Council.

### **Rationale:**

Currently the legislation, states the Prevention Advisory Council must consist of representatives of workers, employers, and the public interest, however, the Act prohibits members of the WCB Board of directors from serving on this council.

Allowing Board participation would strengthen governance alignment, enhance communication, and improve integration of prevention priorities into Board-level decision-making.

### **Key Benefits:**

- Establishes a direct governance link between the Council and the Board
- Improves clarity and efficiency of communication on prevention priorities and partner perspectives
- Enhances Board visibility into system risks, challenges, and opportunities
- Strengthens transparency and accountability in decision-making
- Reinforces prevention as a core function of the workers' compensation system
- Maintains balanced representation while improving system alignment
- Supports Manitoba's collaborative prevention partnership model

## **2. Prevention Activities – Formal Recognition of IBSPs**

### **Recommendation:**

Section 54.1(2) currently outlines the Workers Compensation Board's responsibility to promote workplace safety and health and to prevent workplace injury and illness. Although the Act acknowledges the importance of collaboration, it doesn't explicitly identify Industry Based Safety Programs as formal prevention partners, despite their integral role in Manitoba's prevention system.

Amend Section 54.1(2) to formally recognize Industry-Based Safety Programs (IBSPs) as key prevention partners and require structured collaboration between WCB/SAFE Work Manitoba, Workplace Safety and Health Branch and IBSPs.

**Rationale:**

Formal recognition would align legislation with current practice, the Prevention Charter and strengthen coordinated, sector-specific prevention efforts.

**Key Benefits:**

- Aligns legislation with Manitoba's existing prevention framework
- Recognizes IBSPs' established role in industry specific training, certification, and prevention support
- Strengthens collaboration and coordination among prevention partners
- Enhances delivery of sector-specific prevention strategies
- Supports more effective prevention incentives and programming
- Improves long-term sustainability and consistency of prevention efforts

In closing, MASH strongly supports a coordinated and collaborative approach among all prevention partners to reduce injuries and build a strong safety culture within Manitoba.

Thank you for considering this submission. MASH remains available for further discussion or clarification the Committee may have.

Sincerely,

*Tonya Nelson*

Tonya Nelson  
MASH, Director of Safety Programs

cc Ron Van Denakker, MASH Executive Director  
William Gardner, Chair Manitoba Employers Council (MEC)  
IBSP Council  
MASH Board of Directors