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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 'Jacquelyn Oduro'.

Jacquelyn Oduro
MHCA WorkSafely Program Director

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