

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

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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.



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