

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,



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