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June 29, 2022

WSIB Consultation Secretariat
200 Front Street West
Toronto, Ontario M5V 3J1

Sent by email to: consultation_secretariat@wsib.on.ca

Dear Consultation Staff,

Re: Temporary Employment Agency Rate Setting Consultation

The Ontario Network of Injured Workers' Groups (ONIWG) is the voice for injured workers across the province of Ontario.

It is our position that this consultation is unnecessary and that the WSIB should implement the new rate setting framework for Temporary Employment Agencies (TEA) that was to be introduced in 2020.

The new rate setting framework for TEAs was supposed to generally align TEA rates with the rates of their clients' classes. This would cause rates to increase for some TEAs.

The intent of the new framework was to remove the financial incentive businesses have in contracting out dangerous work to TEAs in order avoid higher claim costs. Ultimately, workplaces would be made safer by aligning the rates.

The WSIB delayed the implementation of these changes because of complaints from the business community. This sends a message to injured workers that any perceived decision not in businesses' favour will be met with delays and possible reversals by the WSIB. At the same time, injured workers have requested numerous policy changes for many years that the WSIB has ignored.

ONIWG's longstanding position is that experience rating should be abolished and replaced by a simpler flat rate system. However, as this consultation is focused strictly on TEAs, we would reiterate that the WSIB should not further delay the changes that were meant to be introduced in 2020.

Thank you for reviewing our submission. If you have any questions, please email oniwgexec@gmail.com.

Sincerely,

Janet Paterson, President