



## ONTARIO ROAD BUILDERS' ASSOCIATION

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Consultation Secretariat  
Workplace Safety & Insurance Board  
200 Front Street West  
Toronto, ON M5V 3J1

### **RE: WSIB Consultation on its December 2015 Rate Framework Reform Proposal Updated**

The Ontario Road Builders' Association (ORBA) is the voice of the road building sector in Ontario. Our members build the majority of provincial and municipal roads, bridges and transportation infrastructure across the province, and employ in excess of 30,000 workers at peak season.

On behalf of our members, ORBA is pleased to comment on the Workplace Safety and Insurance Board's (WSIB) updated Rate Framework proposal. ORBA members appreciate the fact that the December 2015 Rate Framework update provided by WSIB included some of the stakeholder feedback into its initial Rate Framework proposal. While the recommended changes are welcomed, ORBA members believe there are still areas of improvement in the current Framework design.

ORBA is part of Construction Employers Coalition (CEC) whose purpose is to study and respond to "big-picture" issues related to the occupational health and safety, accident prevention, and WSIB that affect the construction industry in Ontario. In writing, we lend our support to the comments provided by CEC on the updated Rate Framework proposal.

In addition to the comments discussed in the CEC submission, ORBA members would like to reiterate the concept discussed in our October 2015 submission that the WSIB continue to allow for multiple classifications for multiple business activities. ORBA members are pleased to see that the WSIB will be further exploring exceptions for separate classifications and multiple rates for a single employer. However, ORBA members continue to be of the opinion that the inability to treat separate and distinct businesses differently will significantly impact the viability of the business that would otherwise be classified in a lower class but for issues of ownership.

ORBA is committed to working with the WSIB to ensure that the Proposed Rate Framework not only reflects the WSIB's stated objectives, but that it is also in keeping with the WSIB's mandate, principles of reasonableness and assists the WSIB in managing its unfunded liability.

Sincerely,

Geoff Wilkinson  
Executive Director