

**Construction Employers Coalition  
(for WSIB and Health & Safety and Prevention)**



Submitted to: [Consultation\\_Secretariat@wsib.on.ca](mailto:Consultation_Secretariat@wsib.on.ca).

February 9, 2022

Ms. Angela Powell, Vice President Policy and Consultation Services  
Workplace Safety & Insurance Board  
200 Front Street West  
Toronto ON M5V 3J1

Dear Ms. Powell:

**Re: Occupational Disease Policy Framework Consultation**

Thank you for convening the meeting which took place on January 19, 2022 to discuss the WSIB **Draft Occupational Disease Policy Framework** (“**Draft Framework**”). Please consider this letter as our written submissions.

At the January 19, 2022 meeting, the Board confirmed that the **Draft Framework** does not include new information and has been prepared to promote issue momentum to update occupational disease policies, bring focus to the issue, provide transparency and assess and implement scientific research.

As it is clear that no new approaches are being set out in the **Draft Framework**, it is our position that the most significant and still viable document setting out a new direction for the administration of occupational disease in Ontario is the **Final Report of the Chair of the Occupational Disease Advisory Panel**, February 2005 (“**ODAP Report**”). The **ODAP Report** sets out a series of comprehensive **recommendations** which remain relevant to this day.

While there was some renewed and sincere WSIB focus in the immediate wake of the **ODAP Report** (we can share those with the Board if desired), within a very short time, the Board’s renewed engagement in occupational disease waned. The interest in ODAP and occupational disease simply was not sustained and was displaced by other emerging issues. An internal assessment and analysis by the Board of its corporate response to ODAP, we sincerely suggest, may be instructive for this and other issues, and we would encourage the Board to conduct such a review.

While we view the Board’s renewed interest as important and necessary, in effect this as a continuation of what the **ODAP Report** commenced almost twenty (20) years ago. The new **Draft Framework** should simply be viewed as **ODAP 2.0**. We are guided more by the **ODAP Report** and the process which preceded that report.

We draw your attention to the **ODAP Report Executive Summary**, and in particular to the following recommendations which were added as a result of the public review completed in 2004 and which are discussed in the document entitled “*Chair’s Response to ODAP 2004 Public Consultation*”:

- 1. Monitoring of occupational disease costs should be a priority of the WSIB. If these costs continue to escalate as they have during the past two years, the Board should consider alternative strategies to cope with them.**

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- 2. The Board should look at directing the WSIB to prepare a paper on the issue of alternative funding formulas for the Board's consideration. The paper could also be circulated for public comment.**

Time has shown that the Board did not prudently follow through with those core and important recommendations. We encourage the Board to pick-up where it dropped the ball, follow through with these recommendations of the **ODAP Report**, and commence that important element of public consultation as suggested by the ODAP Chair.

Please reach out at any time, as we welcome discussion on this topic.



David Frame, CEC Chair