

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



November 23, 2023

The Hon. David Piccini, Minister of Labour,  
Immigration, Training and Skills Development  
Ministry of Labour, Immigration, Training and Skills Development  
400 University Avenue, 14<sup>th</sup> Floor  
Toronto, ON M7A 1T7

Dear Minister Piccini:

**Re: CEC suggestion related to the Government's consideration of the  
level of WSIB loss of earnings benefits (85% of net *versus* 90% of net)**

We congratulate you on your appointment as Minister of Labour, Immigration, Training and Skills Development. The **Construction Employers Coalition for WSIB and Health & Safety and Prevention (CEC)** represents more than 2,000 construction firms employing approximately 80,000 workers. The CEC was formed in 2010 for the purpose of studying and responding to workplace safety and insurance issues related to Ontario's construction sector. A list of our members is at **Appendix A**.

We look forward to working with you and the WSIB on current and emerging workplace safety and insurance issues. There is one issue which we anticipate you will be addressing in the near future - the review of the WSIB benefit wage replacement rate. As background, we present the following:

- The **Government announced on [April 20, 2022](#)** that it was directing the WSIB to explore options about increasing WSIB loss of earnings benefits from 85% of net to 90% of net.
- The **CEC wrote to Minister McNaughton on July 21, 2022** (see **Appendix B**). We recommended that the Ministry's first step should be to commission an academic level analysis and report similar in approach to the 1997 "*Compensation Rate Briefing Paper*" commissioned by the **British Columbia Royal Commission on Workers' Compensation**. As far as we have been able to determine, that **Briefing Paper** (attached at **Appendix C**) stands alone as an academic analysis on this issue. The issue warrants a fresh but comprehensive assessment.
- The **CEC wrote to Minister McNaughton again on March 20, 2023** (see the letter and forwarding email at **Appendix D**) repeating our suggestion. We remain of the view that an academic level review is necessary. The issue is not as simple as "winding the clock back" to pre-1998 levels (90%) or to make changes to emulate the benefit level in some other jurisdictions.

We would be happy to discuss this issue with you at your convenience and look forward to taking part in a full review of this issue.

Your truly,

Andrew Pariser, CEC Chair

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**Appendix A**

**CEC members include:**

Ontario General Contractors Association (OGCA)  
Ontario Road Builders' Association (ORBA)  
Mechanical Contractors Association of Ontario (MCAO)  
Ontario Sewer & Watermain Contractors Association (OSWCA)  
Kingston Construction Association  
Niagara Construction Association  
Ottawa Construction Association  
Sarnia Construction Association  
Merit Ontario  
Ontario Home Builders Association (OHBA)  
Heavy Construction Association of Toronto (HCAT)  
Progressive Contractors Association of Canada (PCAC)  
Residential Construction Council of Ontario (RESCON)  
Ontario Residential Council of Construction Associations (ORCCA) including its members:  
Residential Tile Contractors of Ontario (RTCA)  
Ontario Concrete and Drain Contractors Association (OCDCA)  
Masonry Contractors Association of Toronto (MCAT)  
Ontario Formwork Association (OFA)  
Residential Framing Contractors Association (RFCA)