

November 9, 2020

Ms. Erin Oliver
Chair, The Prevention Council
Ontario Ministry of Labour, Training and Skills Development
400 University Avenue, 14th Floor
Toronto M7A 1T7

Re: Implementing title protection for qualified Occupational Health and Safety Professionals in Ontario

Dear Ms. Oliver,

As you know, the COVID-19 pandemic has placed many health and safety strains on Ontario workplaces. In order to curb the spread of the virus, the Province instituted critical occupational health and safety (OHS) guidelines that workplaces were required to meet. Given the potential health hazards that COVID-19 has introduced and the costs associated with OHS incidents, more Ontario businesses are relying on occupational health and safety consultants or practitioners to ensure their workplaces are safe, comply with new rules, and conform to increasingly complex legislation.

We applaud Ontario businesses for the proactive steps they have taken to establish safer workplaces for their employers and clients. However, unqualified, negligent, and even fraudulent health and safety practitioners in the field poses a serious risk for Ontario's business community and the general public. Thus, we support the Board of Canadian Registered Safety Professionals' request that the term "Occupational Health and Safety Professional" be made a protected title in the province of Ontario.

Like other regulated professions in Ontario, title protection for Occupational Health and Safety Professionals should include mandatory educational and experiential qualifications, as well as the creation of an oversight body who would administer the title protection framework and collect and analyze formal complaints against OHS professionals.

If title protection were implemented for OHS professionals, Ontario businesses would not face additional costs or administrative burdens. We believe that businesses should continue to retain the authority to determine who they hire to provide workplace health and safety advice. However, such a designation would enable businesses to more easily identify OHS professionals who are qualified, competent, and credible. With such a designation, firms would be better positioned to assess the individuals they wish to hire to address important workplace safety issues.

Establishing title protection would also raise the bar when it comes to the delivery of quality services and ensure the money spent to address or improve workplace safety is not wasted on unqualified individuals. This could in turn reduce faulty or fraudulent actors in the health and safety industry, enhance workplace safety overall, and protect consumers. Moreover, by entrusting their workplace safety issues to a regulated professional, Ontario businesses could also reduce the time and money that is typically spent on occupational injuries and illnesses, such as WSIB costs, lawsuits, and legal fees.

Public health and safety are priorities for all Ontario businesses. We will continue to monitor and assess new developments pertaining to COVID-19 closely and work with our members, partners, and all levels of government to provide support to Ontario business.

Sincerely,



Rocco Rossi
President and CEO
Ontario Chamber of Commerce

CC: Ron Kelusky, Chief Prevention Officer/Assistant Deputy Minister, Ontario Ministry of Labour, Training and Skills Development

David Johnston, Chair of the Governing Council, Board of Canadian Registered Safety Professionals