

September 23, 2021

The Hon. Monte McNaughton
Ministry of Labour, Training and Skills Development
14th Floor, 400 University Avenue
Toronto, Ontario
M7A 1T7

Re: Developing Timelines and an Implementation Plan for OHS Title Protection

Dear Minister McNaughton,

Thank you for your continued leadership during the COVID-19 pandemic. I am reaching out to discuss title protection for qualified Occupational Health and Safety (OHS) Professionals in Ontario. This is an issue the Ontario Chamber of Commerce (OCC) previously raised with the Ontario Prevention Council in November 2020.

We are pleased the Prevention Council recommended that your ministry adopt title protection for OHS professionals. However, we urge your ministry to prioritize title protection for OHS professionals, develop clear timelines, and an implementation plan for this initiative.

With Ontario's digital verification app for vaccines expected in October, the economy is slowly reopening. The OCC has consistently encouraged policymakers and the business community to leverage all the tools in the proverbial toolbox to combat the virus – from COVID-19 vaccination to rapid testing to proof-of-immunization.

As another layer of protection, businesses have been relying on the advice of OHS professionals to help them navigate evolving COVID-19 safety protocols and establish a safe work environment for employees, clients, and the public. OHS professionals ensure that workplaces are compliant with OHS legislation and are taking appropriate steps to reduce illness, injury, and death.

As outlined in our [previous letter](#), title protection would help businesses identify competent OHS professionals more easily. Businesses would be able to select professionals who meet certain educational and experiential qualifications and are accountable to an oversight body. This body would administer the relevant title protection framework and collect and assess formal complaints against OHS professionals.

Further, we believe Ontario businesses should continue to have the ability to choose which OHS professional they hire. In other words, title protection should not make the use of safety professionals mandatory for businesses, nor require businesses to hire those who are registered with the oversight body.

Once developed, title protection, the title protection framework, and the oversight body would protect Ontario businesses and workplaces from negligent and/or fraudulent individuals. It could also ensure the money businesses spend to address or improve workplace safety during COVID-19 is not wasted on unqualified practitioners. This is critical to protecting public and workplace safety. It is also critical considering the economic hardship many businesses have experienced in the last 19-months.

As you know, the provincial government has successfully introduced title protection for various professionals in recent years. As one example, [Budget 2019](#) included details around title protection for financial planners and financial advisors and the independent regulatory agency that was subsequently created – the Financial Services Regulatory Authority of Ontario (FSRA) – to regulate a range of sectors.

Despite the Prevention Council's endorsement in June 2021, comparable details and legislation have yet to be released or developed for OHS professionals. At the same time, Ontario is at a critical juncture as the province grapples with a fourth wave and more contagious variants such as Delta. Against this backdrop, policymakers should not lose sight of the importance of title protection for OHS professionals.

Developing clear timelines and an actionable plan as it relates to title protection for OHS professionals could reduce COVID-19 exposure and spread, ensure safe re-openings, and prevent future lockdowns. This plan should be developed in consultation with stakeholders. Further, the province should provide stakeholders and current OHS professionals with a sufficient timeframe to adjust to new regulatory requirements.

We would be happy to discuss these issues further and look forward to continuing to work with you on solutions that protect the health and safety of Ontarians.

Sincerely,



Rocco Rossi
President and CEO
Ontario Chamber of Commerce

CC: Tim Dutton, Deputy Director of Policy