135

The Excluded Workers:
A Case For Universal Workers' Compensation in Manitoba

By

Kari Swarbrick

A Thesis
Submitted to the Faculty of Graduate Studies
in Partial Fulfillment of the Requirements
for the Degree of

Master of Public Administration

Department of Political Studies
University of Manitoba
Winnipeg, Manitoba

(c) 1995

National Library of Canada

Acquisitions and Bibliographic Services Branch

395 Wellington Street
Ottawa, Ontario
K1A 0N4

Bibliothèque nationale du Canada

Direction des acquisitions et des services bibliographiques

395, rue Wellington
Ottawa (Ontario)
K1A 0N4

Your file Votre référence

Our file Notre référence

The author has granted an irrevocable non-exclusive licence allowing the National Library of Canada to reproduce, loan, distribute or sell copies of his/her thesis by any means and in any form or format, making this thesis available to interested persons.

L'auteur a accordé une licence irrévocable et non exclusive permettant à la Bibliothèque nationale du Canada de reproduire, prêter, distribuer ou vendre des copies de sa thèse de quelque manière et sous quelque forme que ce soit pour mettre des exemplaires de cette thèse à la disposition des personnes intéressées.

The author retains ownership of the copyright in his/her thesis. Neither the thesis nor substantial extracts from it may be printed or otherwise reproduced without his/her permission.

L'auteur conserve la propriété du droit d'auteur qui protège sa thèse. Ni la thèse ni des extraits substantiels de celle-ci ne doivent être imprimés ou autrement reproduits sans son autorisation.

ISBN 0-612-13520-9

Canada

THE EXCLUDED WORKERS:

A CASE FOR UNIVERSAL WORKERS' COMPENSATION IN MANITOBA

BY

KARI SWARBRICK

A Thesis submitted to the Faculty of Graduate Studies of the University of Manitoba in partial fulfillment of the requirements of the degree of

MASTER OF PUBLIC ADMINISTRATION

© 1995

Permission has been granted to the LIBRARY OF THE UNIVERSITY OF MANITOBA to lend or sell copies of this thesis, to the NATIONAL LIBRARY OF CANADA to microfilm this thesis and to lend or sell copies of the film, and LIBRARY MICROFILMS to publish an abstract of this thesis.

The author reserves other publication rights, and neither the thesis nor extensive extracts from it may be printed or other-wise reproduced without the author's written permission.

Abstract

Twenty-five percent of Manitoba's working population do not have mandatory workers' compensation coverage. The impact of an occupational injury or illness on these particular workers, their families, their employers and society as a whole can be devastating. To protect workers in Manitoba, it is recommended that the province adopt a system of universal workers' compensation.

Through an examination of existing literature, legislation, government documents and interviews, this problem is examined. To effectively control workplace hazard causation, prevention must be a priority and where this is not possible mitigation must be available.

This thesis shows that workers' compensation has developed in Manitoba, to exclude select groups of workers from mandatory compensation coverage. Further it demonstrates that these excluded workers are exposed to many workplace health and safety hazards, which can never entirely be prevented. However as mitigation, in the form of compensation, is not available to these workers, full hazard control is not presently operational in Manitoba.

Manitoba has a long history of proposing to expand workers' compensation coverage, however it has only minimally acted upon these proposals. The Workers' Compensation Board of Manitoba has recommended methods by which compensation coverage might be expanded. One of these proposed methods was used in British Columbia to successfully create a system of universal workers' compensation. Manitoba should adopt the implementation method used in British Columbia, which requires all workers and industries to be automatically covered by workers' compensation, with very few exceptions. This would effectively protect Manitoban workers, employers and society as a whole.

Acknowledgements

I would like to thank my thesis advisor, Dr. K. McVicar for his invaluable feedback and support in writing this thesis. Further I would like to sincerely thank my committee members: Professor Wally Fox-Decent who commands a wealth of knowledge on this subject and is always willing to share it; Professor Adie who always had his door at the University of Winnipeg open to me; Professor Vorst who introduced me to the Labour Studies Reading room where considerable information on this topic could be found.

I would also like to thank many other individuals, who without their assistance this paper would not have been completed. I would like to thank Krista Stevens at the WCB, who would hunt down a report for me at a moments notice. Further I would like to thank Cheryld Tores-Aquino at the Board's research branch who opened the door to me on many occasions. To Gene Van Wellingham at the Occupational Health and Safety Library and Lorie King at Labour Canada I send many thanks.

I would like to send a special thank you to Kathy Dunlop, who has been so very patient with me throughout my graduate studies. Kathy, you have given me considerable support and encouragement for which I will be eternally thankful.

To my family and friends . . . thank you!

Table of Contents

Abstract

Acknowledgements

Chapter	Page
1. Introduction	1
2. Historical Development of the Workers' Compensation Act and the Excluded Workers	7
2.1 The British Origin of Workers' Compensation	8
2.2 Common Law Method of Recovery	10
2.3 The Emergence of Workers' Compensation	13
2.4 Manitoba: The Historic Trade off and the Development of Workers' Compensation	15
2.5 No-Fault Mandatory Workers' Compensation: The Pursuit of State Run Insurance	18
2.6 Amendments and the Expansion of Coverage	21
2.7 Who are the Excluded Workers?	31
2.8 What are the Excluded Occupations?	34
2.9 Manitoba and Mandatory Workers' Compensation Coverage: Why Workers Remain Excluded Today?	37
3. The Problem of Workplace Safety and Health	42
3.1 Hazards, Risk and Uncertainty: The Core of the Workplace Problem	45
3.2 The Process of Hazard Control	47
3.3 Causal Anatomy of Hazards	48
3.4 Strategies for Control	49
3.5 Controlling Hazards in the Workplace: The Regulators Dilemma	52
3.6 Confounders: an Added Dimension to the Problem	55
3.7 Factors Compounding the Problem of Workplace Safety and Health	59
3.8 Consequence of the Regulation Dilemma	63
3.9 Strategies for Control in Manitoba	65

4. Universal Workers' Compensation in Manitoba 73

4.1 Hazards Impacting on the Health of the Excluded Workers 74
4.2 Needs of Ill or Injured Workers 89
4.3 Provisions Available to the Excluded Workers When Prevention is not Possible 90
4.4 History of the Call for Universal Coverage 96
4.5 Universal Workers' Compensation: The British Columbia Experience 101
4.6 Expansion of Coverage: Implementation in Manitoba 104
4.7 Universal Workers' Compensation in Manitoba: Future Goals for Expanding Coverage 108

5. Conclusion 111

6. Glossary 117

7. Appendices 118

8. Bibliography 131

Introduction

Work is the very essence of who we are as individuals. When a person is introduced to someone new the first question often asked is "What do you do for a living?" or "Where do you work?" The importance of work to individuals in our culture is evident in that historically we even took our names from what we did as work. Mr. Smith could have been the local blacksmith, while Mr. Taylor was likely the local tailor. Names identified people with their occupations. The identification with work is not unusual in Canada considering that nearly one quarter of Canadian workers spend more than "half their waking hours at their places of work and devote many other hours to job-related activities such as . . . travelling to and from work (Cornish and Ritchies 1980, 7).

Work consumes time and energy; however, it is vital to the support of an individual family unit and accordingly to the whole of society (Cornish and Ritchies 1980, 7). Work provides a family unit with resources to purchase the necessities and luxuries of life. It is these purchases which make our economy function. Disruptions in the operation of the economy can have a detrimental impact on society. Disruptions can come in the form of injury or illness to a worker. Therefore, society has a vested interest in preventing workplace injury or illness, which have the potential to harm society as a whole.

1. This thesis will show that workers' compensation has developed in Manitoba, to exclude a select group of workers[1] from the benefits of mandatory compensation coverage. It will show that the primary reason for the exclusion of these particular workers is the difficulty that regulators have in identifying workplace hazards, in particular health hazards, which impact on these workers.

2. Further it will demonstrate that for effective control of workplace hazards, prevention must be the goal and where this is not possible the injured or ill worker should be compensated for the injury or illness in order to mitigate the hazardous consequences.

3. It will demonstrate that while Manitoba has had a long history of proposing to broaden workers' compensation coverage, these proposals have been acted upon only minimally.

4. It will recommend that to effectively control workplace hazards the province of Manitoba should adopt a system of universal compensation. A system of universal workers' compensation would encourage the Workers' Compensation Board to play a more preventive role in workplace injury and illness and would facilitate increased communication between Occupational Safety and Health and the Workers' Compensation Board of Manitoba, thus ultimately effectively protecting workers and society as a whole.

---

[1] These workers are referred to in this paper as the excluded workers. The excluded workers are those workers without mandatory workers' compensation coverage however for the purposes of this paper the author will concentrate on workers in the following categories: agricultural workers, teachers, clerical workers and domestics.

When a labourer is injured or dies while at work the brunt of the effects fall on the worker and his or her family. The impact has three features: physical, emotional and economic. With respect to the physical impact, the individual worker and family must deal with the immediate physical pain and suffering and eventually rehabilitation if it is necessary. Moreover, the emotional suffering caused by the injury or illness places additional stress upon the worker and the family unit. In the unfortunate event of death, the family must deal independently with their grief. With injury the family suffers economically from the temporary loss of wages during recuperation and in the event of death permanent loss of wages.

When accident or illness occurs on the job, although the major impact of the incident falls on the worker and his/her family, the employer is also affected. The employer in most cases loses valuable production time and experienced labour. This loss might result in retraining of a replacement worker or in reduced production. The impact could be considerable and could have serious repercussions on the operations of the business. Considering that the impact of an industrial accident or injury is eventually felt by society as a whole, society has a duty to protect workers. In order to remain productive and likewise healthy society should work to prevent injuries and illness occurring in the workplace. Where prevention is not possible society should protect workers and their families from the physical, emotional and economic consequences of such injuries.

The development of Manitoba's policy in occupational safety and health and workers' compensation has to some extent assisted in preventing injuries and illness and in protecting against the consequences.

Fundamentally, workplace health and safety legislation plays a proactive role of prevention in workplace safety and health. This legislation provides for a preventive evaluation of workplaces through an inspectorate and legislation, to eliminate potential hazards that result in accidents and illness. However, these provisions are not one hundred percent effective and often workers are injured or become ill. Where prevention fails, methods of hazard control require mitigation in the form of workers' compensation to redress the injury or illness and likewise protect workers and their families from the consequences of an illness or injury.

Hazard control is not as ideal as this prevention/compensation commentary leads one to believe. In Manitoba, for example, occupational safety and health legislation pertains to one hundred percent of Manitoba's workforce; however only about seventy five percent of the workforce have access to the protective benefits of workers' compensation coverage. Some twenty five percent of Manitoba's close to 590,000[2] workers do not have mandatory workers' compensation coverage. This thesis will focus on these excluded workers.

Chapter two of this thesis will briefly outline the history of the development of the Workers' Compensation industrial coverage in the Province of Manitoba. Particular attention is devoted to the historical trade off which led to the development of the Workers' Compensation Board. The chapter then examines the extension of coverage from the inception of the Board until present day. Finally it concludes with possible reasons for not

---

2 This statistic is from the 1991 Census.

expanding coverage to the entire labour force of Manitoba.

Chapter three will examine the problem of workplace safety and health and the role of workplace hazard control. It begins with a brief discussion on workplace hazards, risks and uncertainty. The chapter will then treat the theory of hazard control, the prevention of hazard events and where this is not possible mitigation of hazard consequences. Further, it will examine the difficulty in identifying health hazards, and the role that confounders[3] and other problems play in hindering hazard identification, thus making workplace hazard prevention difficult. This chapter will conclude with a discussion of the current strategies for hazard control in operation in Manitoba.

Chapter four will begin with an examination of the many potential hazards which the excluded workers in Manitoba do in fact encounter in their workplaces. Particular attention will be devoted to hazards which impact on agricultural workers, teachers, clerical workers and domestics. The chapter will then shift to examine the needs of injured workers when prevention efforts fail. Alternative sources of compensation protection available to workers not protected by workers' compensation will then be presented. This chapter will establish that there is a long history of recommendations for broadening workers' compensation coverage in Manitoba. The chapter will then suggest that Manitoba adopt a system of universal workers' compensation similar to that of British Columbia, where on January 1, 1994 universal workers' compensation came into operation. The chapter will

[3] Definition to be found in Glossary.

conclude with a discussion of the benefits that a system of universal workers' compensation will have on Manitoba.

Chapter 2

Historical Development of the Workers' Compensation Act of Manitoba and the Excluded Workers

> One of the cardinal tenets [of workers' compensation] is said to have been the aspiration that as time progressed Workers' Compensation might be expanded to cover all employers and employees (Manitoba 1980, 4).

This goal has yet to be fulfilled in Manitoba. In 1994, it is estimated that twenty-five percent of Manitoba's workforce are without the protection of workers' compensation (Workers' Compensation Board of Manitoba 1994, 16).

This chapter will establish that although several extensions of workers' compensation coverage have occurred since its inception in Manitoba, select trades of workers remain without the protection of mandatory coverage. Further investigation will identify those workers who have been excluded from mandatory coverage of workers' compensation and the nature of the industries in which they work. This investigation will begin with the British origins of workers' compensation and the transition to the passage of Manitoba's first full no-fault legislation the *Workmen's Compensation Act 1916*. The chapter will then examine the amendments to the Act, which extended coverage to new areas.

The paper will then identify those industries and the composition of those workers who are not covered by compensation. The chapter will conclude with a discussion of reasons why there has only been limited

expansion in coverage to workers in Manitoba, in spite of several Royal Commissions and reviews which have recommended significant expansions in coverage.

2.1 The British Origin of Workers' Compensation

Legislation relating to worker protection in Manitoba originated in Great Britain as far back as 1349. It was during that year that Europe became engulfed by the Black Plague. As the deadly disease infested the continent, an estimated one-third of the working population perished (Willes 1986, 388). The King, in response to this devastation, felt compelled to pass the *Statute of Labourers, 1349.* This law endeavored to regulate conditions and wages under which individuals were employed. However, this statute was not strictly enforced and other more significant enforceable attempts to regulate working conditions did not develop for close to 500 years (Willes 1986, 388).

Several improvements were made in the nineteenth century as a result of industrialization. Britain led in many of these changes. Prior to industrialization workers led rather agrarian lifestyles, living and working in family units as independent producers. However, with industrialization society was transformed; social structures changed as did residences, culture, transportation and government (Bartrip and Burman 1983, 7). These changes were rapid and were experienced throughout Europe. In Britain, one of the undesirable effects of industrialization was unsafe working conditions for labourers (Bartrip and Burman 1983, 8).

Pressure to reform the working conditions experienced by labourers arose from "a general belief in the existence of a substantial problem, coupled with a clear appreciation of the horror of individual misfortunes" (Bartrip and Burman 1983, 15). The first of many *Factory Acts* was passed in Great Britain in 1802 (Willes 1986, 388). However, it was not until 1844 that British legislation imposed responsibility on factory managers to fence equipment and compensate injured workers (Bartrip and Burman 1983, 15). These early *Factory Acts* were established to release labourers from many of the less pleasant effects of industrialization by regulating certain working conditions in plants and factories, as well as specifying the number of hours of work and the age at which someone might become employed. These Acts authorized the creation of an inspectorate to ensure compliance with the legislation (Bartrip and Burman 1983, 15). However, these early efforts failed to address:

> the equally pressing issues of the worker's loss of income owing to work-related accidents and the sense of financial insecurity that working people, particularly those in hazardous occupations, must have endured for themselves and their families (Guest 1980, 40).

Accidents continued to occur and workers and their families were often left destitute. Working conditions were to remain a concern to labourers. As industrialization continued, accident rates began to rise and injured workers could only seek compensation through the courts and the use of common law.

2.2 Common Law Method of Recovery

Under the common law when an employment contract was in existence, the employer owed a duty to provide for reasonably safe working conditions. The only recourse that a labourer who was injured at work had was to file suit against his/her employer "for breach of contract and prove the employer's negligence in breaching the contractual obligation" (Manitoba 1987, 30). This was no simple task for the employee, as the common law provided employers with many defences which virtually guaranteed that only a select few of the workers' suits would be successful. The defences most frequently used by employers were the following:

CONTRIBUTORY NEGLIGENCE: if the employer to some degree could prove that the worker was partially negligent, the law suit was prohibited and the worker could not recover for injury.

COMMON EMPLOYMENT: if the employer could prove that the action was committed by the negligence of a fellow employee this defence could be used. It was a direct result of the law of contract, "[s]ince the worker had to sue on his/her contract with the employer, [and] the actions of anyone who was not a party to the contract were irrelevant" (Manitoba 1987, 30).

ASSUMPTION OF RISK: (volenti non fit injuria) when a employee entered freely into a contract of employment with an employer, the worker voluntarily assumed all the risks associated with the execution of his or her duties (Manitoba 1987, 30).

These defenses provided the employer with an advantage in most law suits, as the employer frequently proved that the employee or a fellow employee was negligent and that the injured worker had assumed all the risks.

In the case of worker fatality, the common law method of seeking compensation was not available to the family. Families were often left destitute with no means of support. This obstacle was overcome in 1846 when the British government passed the *Fatal Accidents Act, 1846.* This legislation gave the family of a deceased worker some recovery in certain cases[4] (Bartrip and Burman 1983, 97). This was an important step taken by government in the use of legislation as a method of recovery.

Although government was experimenting with legislation as a method of recovery, the use of the common law remained the sole mechanism of recovery available to injured workers in the majority of cases. As rapid industrial development continued, there was a sudden growth in tort law[5]:

> The staple source of tort litigation was and is the impact of machines-railroad engines, then factory machines, then automobiles - on the human body. During the industrial revolution, the size of the factory labor force increased, the use of machinery in the production of goods became more widespread, and such accidents were inevitably more frequent (Friedman and Ladinsky 1967, 52).

---

[4] The family of a deceased worker could obtain compensation if the death of the worker was found to be caused by negligence of a third party.

[5] Tort law deals with breaches of duty rather than with beaches of contract, leading to liability for damages.

As workplace accidents increased, the opportunities for employees to use the tort law also increased. However, tort law often was not exercised, as a worker considering such a legal undertaking faced both economic and psychological barriers.

In economic terms an injured worker was often without sufficient resources to pursue such legal recourse. The hiring of a lawyer could be extremely costly and beyond the means of most labourers of that time. However, in the last few decades of the 1800's a contingent fee system was established so that a labourer had the opportunity to hire a lawyer and try to recover for injuries sustained at work. Although a worker could then resort to the judicial system, this system was inadequate as most injured workers could not manage financially with the long interruption that the process requires, between bringing a legal suit and securing settlement. Moreover, without any form of legal aid the worker was left at the mercy of this time consuming and inefficient method of recovery.

Many psychological barriers or factors are present which make a worker reconsider or grapple with a decision to undertake a lawsuit against his/her employer. Many of these factors are related to the fact that labour was unorganized and unions virtually nonexistent. A worker who pursued a case against an employer in the courts could be labeled a trouble-maker and consequently have difficulty finding employment elsewhere (Bartrip and Burman 1983, 28-29). Furthermore, there was the possibility that a labourer would not succeed in a case against his/her employer, which provided added stress on that individual and his/her family. The understanding that one might fail in an attempt to recover compensation and that employment in

another form might not be possible at the conclusion of a case was intensified by the fact that one could not often jump from job to job and that there was an extremely limited social safety net available (Scott 1993, 12).

2.3 The Emergence of Workers' Compensation

In Britain, the concept of workers' compensation began to emerge. Pressure groups and a newly organized labour movement pursued an intense campaign for the adoption of workers' compensation. By the early 1870's this campaign gained momentum, as the Social Science Association, a reform group concerned with amending inadequate laws, joined the effort. In early 1872, the association presented a petition to the British Parliament to amend the *Mines Regulation Bill*, so as to provide compensation to injured miners or to their families in the event of death of a miner. The Association asked the House of Commons to "amend this great defect, either in this Bill, or by a more general enactment" (Bartrip and Burman 1983, 127).

Momentum for this cause picked up in May of 1872, when a paper was presented to the Association which stressed:

> the injustice of the doctrines of common employment and contributory negligence and advocated that mine owners should be liable to pay compensation for injuries caused by neglect of safety precautions (Bartrip and Burman 1983, 127).

It was argued rather wisely that compensation would lead the move to optimum safety as more inspections of working conditions would be undertaken. It was further stressed that adherence to inspection

recommendations would push down the costs of premiums. Two months later, a Bill adopting the Association's recommendations appeared in Parliament. However there was no debate and the Bill was subsequently withdrawn (Bartrip and Burman 1983, 128).

Nearly a decade passed before there was any progress in the creation of legislation. In 1880, the British election campaign devoted considerable attention to the concerns of workers and working conditions. The Liberal Party's platform focused on extending the liability of employers (Bartrip and Burman 1983, 149). The newly elected British government soon passed the *Employers' Liability Act, 1880*. The Bill initially proposed to hold employers liable for workplace accidents that were caused by their employees in a supervisory position (Bartrip and Burman 1983, 150). When the Act finally came into existence, the strength and influence of employers was clear in the amendments that had taken place. The new Act was significantly scaled down from the initial proposal as it eliminated the defence of the doctrine of common employment in only three precise cases:

> where the accident was caused by the negligence of a fellow-servant exercising the duty of a superintendent; where it was caused by a workman's obedience to orders or directions issued negligently by a fellow-servant whom he was obliged to obey; where it was caused by the act or omission of a fellow-servant who had charge or control of any signal points, locomotive engine, or train upon a railway (Bartrip and Burman 1983, 156).

Essentially, in these specific cases, where a worker once had to prove

negligence by the employer, all he or she now had to do was show that injury had occurred (Guest 1980, 41).

The passage of the British *Employers' Liability Act, 1880* provided for significant changes in the use of common law remedies of recovery. Employers no longer had the upper hand over employees in their attempts to recover for workplace accidents. The impact of these changes in British legislation was soon to influence events in Canada.

2.4 Manitoba: The Historic Trade off and the Development of Workers' Compensation

In Canada, between 1886 and 1911 a number of provinces enacted statutes patterned after the British *Employers' Liability Act, 1880* . Each of these statutes modified the common law defences. In particular, attention was devoted to the doctrine of common employment. Quebec was the only exception to this as its Act of 1909 granted a worker the right to compensation regardless of fault (Labour Canada 1969, 3).

In 1894 the government of Manitoba passed the *Workmen's Compensation for Injury Act, 1894.* Patterned after the British *Employers' Liability Act, 1880,* it established that employers could be held liable for the negligence of their employees and for injuries caused by defects in the "ways, works, machinery, or plant connected with, or used in the employer's business" (Manitoba 1958, 18). This new Act "basically modified and sharply defined the common law defences available to employers, but left unchanged the necessity of suing in court and proving negligence" (Manitoba 1987, 30).

Dissatisfaction with these changes soon became apparent and alternatives to this policy were proposed. In 1904, the Winnipeg labour movement newspaper, *The Voice* reported that the "working class is paying a fearful tax in blood to the rush, scamper and boom spirit that has been imparted" (*The Voice* August 26, 1904). It was suggested that workplace conditions would improve only if the province adopted "a modern compensation law . . . a law [which] would induce employers to be less negligent and would greatly reduce the number of accidents" (*The Voice* August 26, 1904). This concern was raised for the next several years.

In 1909, the Province of Manitoba appointed a Royal Commission to report on the issue of compensation to workers for accidental injury. Drawing upon experiences in other jurisdictions such as Britain, the Commission sought to find a suitable method of providing compensation in Manitoba. The Commission sent out 250 accident circulars to employers in the province. Only 59 responses were returned reporting a total of 124 accidents occurring in these businesses. Six of these accidents were fatal, and in all of the 124 cases no compensation could be recovered for the workers or their families under the law of Manitoba at that time.

The Royal Commission recommended that the government institute a system of compensation that would require all employers with five or more workers to pay compensation. This was to be the foundation of a no-fault workers' compensation program, where labourers would have an alternative to the sole use of the common law to obtain compensation.

The Royal Commission's recommendations were incorporated in the *Workmens' Compensation Act of Manitoba, 1910.* This legislation furnished injured workers with a choice of using the common law to recoup loss or foregoing a lawsuit in return for no-fault benefits under the Act. This new no-fault system was not compulsory as employers were not obliged to insure themselves. When the benefit alternative was selected, the employee would have benefits starting at only 25 percent of his/her gross salary for the first month of incapacity, 40 percent for the second month, and reaching a ceiling of 50 percent thereafter (Manitoba 1987, 31). This system would prove to be short-lived as events unfolding in Ontario at this time would soon impact on Manitoba.

In 1910, the Province of Ontario appointed Sir William Meredith[6] to "enquire into laws relating to the liability of employers to make compensation to their employees for injuries received in the course of their employment" (Labour Canada 1969, 3). In his final report, Chief Justice Meredith ". . . made an exhaustive examination of various systems of Workmen's Compensation Insurance in force throughout the industrial world" (Workers' Compensation Board of Manitoba Annual 1927, 1). The Meredith Commission recommended a system of compulsory mutual insurance under the management of the state. Meredith Commission's recommendations have proven to be the basis for most workers' compensation systems operating in Canada today.

[6] Sir William Meredith was later appointed as Chief Justice of the Supreme Court of Ontario.