

Pineo Report 1916

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Province of British Columbia

Report of the Committee of Investigation on Workmen's Compensation Laws

Presented March 1st, 1916

Table of Contents

Work of Committee 2
Schedule 2 of Bill – Individual liability..... 3
Medical aid and waiting period..... 5
Safety and Accident-Prevention 7
State-administered Insurance Versus Casualty Companies..... 9
Scale of Compensation 17
Notice and Proof of Accidents..... 19
Classification of Industries and Method of Assessments 19
Assignment or Attachment of Compensation..... 21
Extra-Territorial Jurisdiction 21
Industrial Diseases 22
Administrative Board..... 22
Right of Appeal to the Courts..... 23
Cost of Administration..... 24
Miscellaneous 25
Appreciation of Assistance 26
Conclusion 26
Appendix..... 27

To the Honourable William John Bowser,
Attorney-General of British Columbia.

Sir, – The undersigned Committee, appointed on the 27th day of September, 1915, for the purpose of making investigations in the United States and Eastern Canada, on behalf of the Government of British Columbia, touching the operations of modern systems of workmen's compensation laws, has completed its inquiry, and now begs to tender its report. Having been instructed to undertake these duties for the purpose of acting in an advisory capacity in connection with the proposed workmen's compensation legislation in this Province, the Committee has proceeded on the assumption that whatever legislation is passed will be based on the principle of social justice which underlies the Bill (No. 26) introduced at the last session of

the Legislature – namely, that industry should bear the burden of its accidents, and that the cost should be assessed on the employers to be ultimately distributed among the consumers of the products of the respective industries the same as other elements of the cost of production. This principle being conceded, we have directed our energies to ascertaining whether the provisions of the Bill afford the best system of accomplishing the end in view – the best system, as we conceive it being one which will not only eliminate so far as possible the economic waste attendant on the present system in force in the Province, but which, while protecting the employer against personal-injury claims and ensuring the employee an enlarged and better measure of compensation, will in their common interest exercise a constant and direct force tending to improved personal relations between employers and their employees, and to the creation of better working conditions and the reduction of the opportunities for accident.

Work of Committee

During the course of our investigations we visited the States of Washington, Oregon, California, Wisconsin, Ohio, New York, and Massachusetts and the Provinces of Ontario and Nova Scotia. Hearings were held in some fourteen different cities. Seventy-two witnesses were examined, and the evidence taken covers 1,658 typewritten pages. In each place visited an effort was made to obtain through the different manufacturers' and employers' associations the advice of those familiar with the subject of workmen's compensation who best represented these interests, and in a similar way the opinions of organized labour were secured. We also interviewed the members and officials of the Industrial Insurance Commissions or Boards in charge of the administration of the compensation laws in the several States visited. In this way we succeeded in obtaining the opinions of men of ability who were familiar with the subject from the standpoint of the different interests which they represented. Much valuable information was collected, and many questions of importance were discussed in connection with the proposed legislation. Throughout our investigation we were everywhere accorded the greatest courtesy, and are indebted to the many gentlemen who appeared before us for their generous assistance. In addition to the testimony gathered in this way, we have examined a large number of published reports and bulletins, as well as the Acts in force in the several States visited.

After nearly two months spent in these investigations the Committee returned to the Province, and concluded its hearings by a series of meetings duly advertised and held at Vancouver, at

which representatives of different employer interests, representatives of organized labour, and committees representing the casualty insurance companies and the medical profession were present and took part in the discussions. In addition to the representations made in this way, a number of employers and others have filed written memoranda touching different points in the Bill. These representations made by the different interests have been given consideration and compared with the experience in other places as disclosed in the evidence, the transcript of which has been carefully reviewed.

There are certain matters of special importance in connection with the proposed legislation which we have considered necessary to report on at some length. These we propose to deal with first, and later on in the Report take up a number of other matters, all of which are important, but many of which do not require to be stated in the same detail.

Schedule 2 of Bill – Individual liability

Schedule 2 of last year's Bill, which with the related sections scattered throughout the Bill involves the principle of individual liability so far as railway industries are concerned, and which follows the Ontario Act in this respect, was, we found, omitted entirely from the later Act passed in Nova Scotia. This appears to us to be a decided improvement in many ways. The arrangement of the Act itself is much improved, and a large number of sections throughout the Bill which deal wholly with individual liability and have no connection with the main system embodied therein are eliminated, thus making the Act more uniform and more easily understood by the ordinary man who has to examine its terms in order to see what his rights and obligations are under it.

Certain facts which had been brought to our attention in different States where individual liability had been retained to a limited extent led us to think that any such departure from the general principle adopted by the Bill would sooner or later lead to unsatisfactory results. In fact, we found in the Province of Ontario indications that the operations under Schedule 2 were already leading to dissatisfaction on the part of some of the workmen covered by it. The Committee, having in view the apparent desirability of bringing all employees under the same provisions which apply to the industries included in Schedule 1, so that all workmen throughout the Province would be treated in the same way so far as making their claims for compensation to the Board instead of the employers and being paid by the Board out of the Accident Fund is concerned, communicated with the Provincial representatives of the different railway companies

operating in the Province, and most of these appeared at the meeting of the Committee at Vancouver. The attitude taken by the representatives of the larger railway systems appeared to the Committee to be a reasonable one. They were in general willing to have their employees treated in the same way as all other employees under the Act, and entitled to deal with the Board instead of with the employer direct, provided this could be accomplished without obliging long-established railways which claimed to operate with superior equipment and fewer accidents to contribute towards the payment of accidents of other railways not so well equipped. A suggestion was made that each larger railway might be placed in a separate class under Schedule 1 in such a way that its payments into the Accident Fund would form an individual class fund allocated wholly to that railway, to be maintained and used only for the payment of compensation to its own employees. This suggestion met with the approval of the railways that were represented at the meeting, and this method of dealing with the matter, so far as railways having a considerable number of employees within the Province are concerned, is one which in view of the successful operation of some quite analogous cases in Massachusetts and elsewhere appeals to the Committee as being much to be preferred to the retention of the system involved in Schedule 2.

We therefore recommend that those railways operating within the Province which are parts of or affiliated with transcontinental systems, such as the Canadian Pacific Railway, Grand Trunk Pacific Railway, and Canadian Northern Pacific Railway and their allied telegraph, telephone, steamship, and express company lines, be each constituted a separate class under the Act, and that Schedule 2 be eliminated entirely, the remaining smaller railways being placed in some other appropriate class; and that discretionary power be given to the Board to preserve such individual groupings and make new individual groupings as circumstances may warrant.

Representation was made to the Committee on behalf of certain large employers in other lines of industry that they should be accorded individual grouping under the Act. While it is quite possible this may be found practicable after the Act has been in operation for a few years, the Committee recommends that all these industries be kept, for the present at all events, within their proper class groups.

Medical aid and waiting period

The main provisions of the Ontario Act, which are followed practically verbatim in the Bill introduced last year, were adopted from the Washington Act to a greater extent than from any other. The Committee accordingly devoted a correspondingly large proportion of its time to the examination of that Act and investigation of its operations. The Washington Act has been in force four years, and both employers and employees concur in saying that it has with one exception generally proved to be a most satisfactory piece of legislation.

Absence of any medical-aid provision was found to be the one serious defect in the Washington Act. The Bill as originally introduced in Washington contained a medical-aid provision, but owing to strenuous disagreement as to its terms between the employer and labour interests this provision was dropped by the Legislature. During the four years since then continuous controversy has existed on this point, and repeated attempts to pass measures advocated by one side or the other to the controversy have failed. Owing to a similar disagreement in Ontario the Act as passed there contains no adequate medical-aid provision, and Nova Scotia has followed in the footsteps of Ontario in this particular.

All of the States visited by the Committee, except the State of Washington, have medical-aid provisions, most of them very adequate provisions, and operating with a great degree of satisfaction both to employers and workmen. These provisions cover not only what is commonly known as first aid to the injured workman, but in many cases include transportation to hospital, medical, surgical, and hospital treatment, nursing, and artificial members. It was everywhere impressed upon the minds of the members of the Committee the very great value of this service. Experience has shown that in many cases injured workmen through neglect or improper treatment suffer serious disabilities and infections, often resulting in amputation of members; while similar cases under proper first-aid and medical treatment result only in trifling injuries and disabilities of short duration. Thus adequate medical aid not only results in preventing and alleviating human suffering, and in saving to employers large sums of money otherwise payable in compensation, but also results in preserving and returning to industry the individual efficiency of many of its most competent workmen.

The Committee gathered considerable data on this phase of the subject, and at two informal evening meetings held during the Vancouver sessions was able to place many of these facts

before committees representing the employer and the labour organizations. As a result of these informal discussions an agreement was reached between the Joint Committee of Employers and the representatives of the labour organizations by which it was mutually agreed to recommend to the Legislature a medical-aid provision to be inserted in the Act, providing full medical aid in all cases of industrial accident from the time of injury until the injured workman is restored to health so far as such aid can reasonably restore him. To equalize the cost of this service the workmen are to contribute 1 cent per day from their wages, any balance required to meet the cost to be furnished by the employers. Arrangement is also made for preserving existing systems of medical aid in connection with some of the larger industries in the Province so far as they are found by the Board to be efficient and meeting with the approval of the employer and the workmen concerned. This Agreement as to medical aid is coupled with a provision that there shall be a waiting period of three days provided by the Act, during which time no compensation will be paid in any case, although the injured workman will in all cases receive medical aid from the time of accident.

The terms of this Agreement meet with the unanimous approval of the Committee, and it is to be hoped they will receive the endorsement of all interests immediately concerned in this legislation. In many places where medical aid is provided an absolute waiting period of from seven to fourteen days exists during which the injured workman is paid no compensation, but in most of these cases the cost of medical aid is borne wholly by the employers. In the State of Oregon medical aid is contributed to by the workmen and there is no waiting period, but the medical aid is limited to an expenditure of \$250 in any one case.

The preponderance of opinion expressed by those who appeared before the Committee as students of this class of legislation was that an adequate medical-aid provision is an essential feature of every good workmen's compensation law, and that some short period of time, from three to seven days, is advisable as a waiting period. Experience covering a large number of cases in different countries has shown that only about 30 per cent of all accidents result in a disability of over fourteen days. It is thus quite apparent to any one who considers this fact that a waiting period of two weeks, or even of seven days, withholds a very large amount of money in the aggregate from injured workmen, and must result in a distinct hardship to the lower-waged workman. On the other hand, the scheme proposed in the Bill of paying compensation from the first day in all cases where the disability extends beyond the fourteenth day does not after careful

investigation commend itself to us as the most desirable plan. We think that a waiting period of three days applicable in all cases will be adequate to accomplish any proper purpose sought by those who advocate the necessity of a waiting period, but will not be found to seriously inconvenience the injured workman, especially as he is during this period provided with full and adequate medical aid.

A memorandum of the Agreement above referred to was signed on behalf of the Joint Committee of Employers and by representatives of the Federation of Labour and the Railway Brotherhoods. A copy of this Agreement will be found in the Appendix to this Report, together with a memorandum containing a list of the associations and industries represented by the Joint Committee of Employers.

It is very gratifying to the members of the Committee to be able to report this proposal as to medical aid, and we think that the parties to the Agreement are to be congratulated in having representatives who see the importance of settling this question in a spirit of mutual co-operation at its very inception, rather than have it left open to become the subject of continued controversy as it has in some other places.

Safety and Accident-Prevention

Another matter to which the Committee devoted considerable attention, and one which we think should be given a very prominent place as an essential element in an adequate compensation system, is that of making provision for the bringing about of conditions which tend to the reduction of industrial accidents. Laws which provide for the taxing of industry to furnish compensation for the victims of industrial accidents irrespective of fault are commendable and desirable, but laws which will prevent the happening of such accidents are of more vital importance. In dealing with this subject every consideration should be given to the fostering of conditions which will prevent or minimize the evils which give rise to the necessity for compensation.

In making a comparative study of existing Acts, it has appeared to the Committee that the present Bill does not accord to safety and accident-prevention that prominence which the importance of the subject merits. It is true the Bill provides for the formation of associations of employers within each of the separate classes, with power to recommend safety rules which if approved by the Board become law. The enforcement of these rules is then apparently left to an

inspector employed and paid by that separate class. While this system may work to good advantage in connection with lines of industry which are of sufficient strength to form a class by themselves, we think in this Province, where it will unquestionably be necessary, except in a few industries such as lumbering and mining, to group in one class a number of separate industries, that some other method of dealing with accident-prevention may be found better adapted to our conditions.

Very effective accident-prevention work is being done in many of the States visited. We were most favourably impressed with the method developed in Wisconsin, and more recently adopted with slight changes in a number of other States, as being best adapted to our needs here. In a very general way this may be described as a system by which the administration of the labour laws, including the power to make safety orders or accident-prevention rules, as well as the duty to see that those rules are carried out in practice, is imposed directly on the same Board which administers the workmen's compensation law. General rules as well as special rules applicable only to certain lines of industry are formulated at conferences at which the Board or its safety engineer is assisted by advisory committees, composed jointly of representatives of the employers and the workmen. In the formulation of special rules the advisory committee may be composed of representatives from the industry immediately affected. The assistance obtained in this way from direct practical experience results in the framing of rules applicable to existing conditions. Another object attained which is equally important is the favourable attitude with which rules framed in this way are received by the general body of employers and workmen. Such rules are looked at not as being imposed on the industry by some body from the outside which may or may not have a very practical conception of the needs, but as having been framed in a measure by the employers and workmen themselves in their own interests through the co-operation of their own representatives. The effectiveness of such rules and the comparative ease with which they are enforced is ample proof of the value of this method of dealing with the subject.

These rules are enforced under the direction of the Board through its inspectors, and the enforcement is perhaps more uniform and accomplished at less expense in the aggregate than would be the case if each class of industry had its separate inspection staff. Adequate enforcement of these rules is furthered by a campaign of education carried on by the Board by way of illustrated bulletins, safety exhibits, short talks to groups of workmen assembled in their

own factory, and by evening lecture-entertainments to workmen accompanied by lantern-slides and moving pictures especially illustrative of the subject.

The Committee recommends that ample provision be made in the Act so that a system of accident-prevention may be adopted similar to the systems in operation in the States referred to.

In many places the work of factory and mines inspection, which is usually made the duty of some Government department, has been delegated wholly to the Workmen's Compensation Board. In other places a move in this direction is now contemplated. The Board in administering medical aid and compensation necessarily investigates all industrial accidents. It thus obtains the fullest statistics and knowledge of the frequency and sources of accidents, and is undoubtedly in the best position to devise and apply a remedy. Experience has shown that the advantages of having the prevention of accidents go hand in hand with the administration of medical aid and compensation to the injured workman have been many. We advocate making this important subject of accident-prevention one of the principal departments of the Board. In our opinion the ultimate, if not the immediate, aim in this Province should be the centralizing of these and all similar inspection activities under the Board, so that the same body which is brought into immediate touch with accidents and their causes shall also have charge of the fostering of those conditions which tend to do away with the possibility of accidents and make the payment of compensation unnecessary.

State-administered Insurance Versus Casualty Companies

One question of importance to which the Committee gave very careful consideration was the advisability of exclusive State-administered insurance, or the system of providing the funds required for the purposes of the Act by assessment of the employers in the different industries in the manner proposed in the Bill, as compared with the system of administering this part of the business through the agency of casualty insurance companies. For the purpose of ascertaining at first hand the actual experience on this subject which might be helpful in forming a correct conclusion, we not only visited States having an exclusive State Insurance Fund, but included in our investigation States where the law as enacted gave casualty insurance companies a free field, as well as States where these companies have been permitted to operate in competition with the State Insurance Fund or in competition with mutual companies which have been encouraged or fostered more or less by the State.

The representatives of the casualty insurance companies doing business in British Columbia who appeared before the Committee at our final meeting have adopted a very reasonable attitude, and expressed a strong desire to meet every possible objection in order that these companies might retain this part of their business. The Committee realizes that the prospective loss of business to these gentlemen resulting from the proposed legislation is a serious matter to them, and because of this and of its very great importance to those who are most directly interested in the Bill we have carefully gone over all the evidence taken on this question to make sure that we had given it due consideration. It may be well to state briefly the facts disclosed by this evidence.

The State of Washington was the first to pass an Act incorporating the principle that the State should act as the agent between the employer and employee in collecting and distributing compensation, thus eliminating any casualty company or other go-between whose intervention was for the purpose of making a profit out of the business. This law has been in operation four years, and the total cost of its administration has averaged 7.8 per cent of the total contributions. We found that representative employers and the representatives of organized labour in Washington concur in expressing satisfaction with this system of administration.

The exclusive system of State-administered insurance as established in Washington has not been generally adopted in other States, and one potent reason for this is found in the strenuous opposition of casualty insurance companies. These companies found that the first year's operation of the Washington Act resulted in a direct premium loss to them of some \$600,000, and, fearing a correspondingly increased loss of business in the larger industrial States, they have by bringing their enormous influence to bear succeeded in most instances in preventing the enactment of an exclusive law.

The State of Ohio, after an experience with casualty companies that was far from satisfactory, passed a "Workmen's Compensation Act," which has since been made compulsory, establishing a State Insurance Fund and practically excluding the casualty company. At the last session of the Ohio Legislature these companies, after a State-wide campaign in support of their interests, sought to obtain an amendment of the Act permitting them to re-enter the insurance field in competition with the State Fund. This attempt was unanimously opposed by the Ohio Manufacturers' Association and by the representatives of organized labour before the Ohio Legislature, and the insurance companies failed to secure the amendment of the law.

The cost of administration of the State Insurance Fund in Ohio has been less than 10 per cent of earned premiums, while similar costs of operation by casualty companies have usually been upwards of 40 per cent. The rates of premium under the State Fund are only about one-third as large as those charged by the casualty companies in their Ohio manual of rates. In fact, a computation made on the basis of these rates would show that the Ohio State insurance plan has since its inception saved the Ohio employers over \$8,000,000 in premiums. The representatives of organized labour who appeared before us in Ohio stated that the satisfaction to them of the operation of the present system is a marked contrast to their experience when casualty companies were an active element in the industrial system. In view of these facts the joint and vigorous opposition of employers and employees to the proposed amendment of the Ohio law is readily understood.

In Oregon the Commission appointed by the Governor in 1912 to draft an act investigated carefully the question of economy, and as a result of that investigation decided in favour of State-administered insurance. The experience in that State to date has amply justified this decision.

Owing to constitutional difficulties the Oregon Act was made an elective one, but employers who remain under the Act became contributors to the State Fund to the exclusion of insurance in casualty companies. Notwithstanding the elective feature, and the further fact that certain casualty companies appear to have conducted a persistent campaign of criticism in order to arouse prejudice on the part of employers and workmen for the purpose of destroying the law, between 80 and 85 per cent of employers and workmen in industries within the scope of the Act came under its operations during the first twelve months. At the time of our visit to this State this percentage had increased to between 85 and 90, embracing a considerable number of employers who came under the Act by direct application, showing an increasing preference for the State system.

During the year ending June 30th, 1915, the expense of carrying on all the functions of the Oregon State Industrial Accident Commission, including administration of the State Accident Fund, was only 8.69 per cent of the moneys handled by the Commission. In comparing this experience with that of the State of Wisconsin, where free competition of insurance companies is permitted, we are told that it cost Wisconsin employers insuring in stock companies in 1914 an

average of \$2.07 to place \$1 of benefits in the hands of injured workmen, while in Oregon it has only cost \$1.13; a total saving on the year's business in Oregon of \$351,522.44 as compared with the Wisconsin method.

In California, where the competition of casualty insurance companies with the State Fund has been encouraged rather than otherwise, we find even among those whose affiliations would naturally lead them to favour the casualty companies some who are far from being convinced that the present competitive system in that State is the ideal system. One of the casualty companies doing compensation business in that State has recently gone into the hands of a receiver. The State Insurance Fund, on the other hand, charging the same rates of premium as the casualty companies, has owing to the economy of its operation been able in fourteen months to pay back to employers under its participating policy a dividend of 15 per cent after providing ample reserves to cover all outstanding losses. The average expense of the casualty companies is approximately 40 per cent of earned premiums, while the total expenses of running the State Fund in California has been less than one-third of that, or 11.45 per cent of earned premiums. It has already been found in California that competition in this matter of insurance saddles a great amount of expense on the business and ultimately on the employer.

In 1911, when the State of Wisconsin passed its "Workmen's Compensation Act," practically no experience had been had in this country with State-administered insurance. The idea of a State Fund was given up as too uncertain an experiment, and the field thrown open to all insurance companies. The casualty companies, apparently in an endeavour to defeat the Act, which was elective, advanced their rates for compensation insurance on an average more than two and one-half times those of "liability" insurance for employers who rejected the Act. Fortunately, through provision which the Legislature had made for mutual insurance, the employers were able to organize mutual companies giving insurance at a more reasonable cost. By reason of the growing success of these mutual companies the stock companies have since twice reduced their rates, the average rate for fifteen of the leading industries being now less than half the average rate charged in 1911.

Even with special efforts to reduce their operating expenses the stock companies in Wisconsin have been unable to make a favourable showing as compared with the mutual companies. For 1914 the expense ratio of stock companies was 38 per cent of earned premiums, while that of the

mutuals was only 18 per cent. In fact, the expense incurred by the stock companies for agents' commissions alone equals the entire operating expenses of the Wisconsin mutuals. Out of every dollar contributed to mutual insurance in Wisconsin 75 cents goes to the injured workmen, while in the stock companies only 48 cents of every dollar paid by the employer reaches the workman, the balance being consumed in acquisition costs, overhead expenses, and profits to shareholders. About one-third the cost of operating the mutual companies is said to be incurred by the expenses of soliciting and advertising for business which are made necessary by the existing competition. If the premiums at present paid by employers in Wisconsin were administered at an expense not exceeding the average of the exclusive State Funds, the workman would receive \$22.50 for every \$12.59 he gets now. The element of private profit in this branch of insurance has been found in Wisconsin to be not only an economic evil, but an obstruction also to the proper administration of the law.

In the State of New York all forms of insurance are allowed in competition with the State Insurance Fund. The records of the first six months of the existence of the State Fund show that it has done more business than any other insurance-carrier except one, and this without having at its command any staff of soliciting agents. The cost of operation of the State Fund, which is necessarily greatest at its start, has amounted to only 17 per cent of earned premiums for the first six months, and has since that period been considerably less. Because of economy of operation the rates of the State Fund have been reduced 20 per cent below those of the stock companies, and the State Fund has even then a larger percentage of its premiums to devote to payment of claims and reserves than the companies. The policyholders in the State Fund, through lower rates and dividends, have been saved about \$250,000 in six months' insurance as compared with what they would have had to pay if insured in stock companies.

In Massachusetts an exclusive mutual insurance system was contemplated when the Act was drafted, but the influence of the casualty insurance companies proved too strong, and the Legislature allowed them to compete for the business with this mutual system. Experience has shown that this mutual company, which is generally acknowledged to be adequate from the standpoint of stability, can be operated at an expense of less than 15 per cent of earned premiums. Eight of the casualty companies which are now asking to be allowed to compete under the proposed Act in British Columbia have, we find, been doing business under the system

of competition in Massachusetts. Their operating expenses in that Commonwealth for the year 1914 averaged 39.42 per cent of earned premiums, as compared with an expense ratio of less than half that percentage in the mutual company.

The experience in Massachusetts as regards rates was also found to be in favour of the mutual companies. Under rates which were substantially the same as those charged by the stock companies, the mutuals had in some instances paid dividends of 30 per cent to their subscribers. An investigation of these stock companies carried on last year by a Commission appointed by the Governor under a special Act of the Legislature found that the companies transacting a workman's compensation business in the Commonwealth had required less than 40 per cent of the actual earned premiums to pay all their losses, and that large amounts of money are expended in commissions to agents and solicitors far in excess of any real service which they perform to the employer. The Commission also found that the casualty companies which were members of the New York Bureau had in January, 1914, given to one man absolute authority to make rates in Massachusetts for those companies, a situation which the Commission regarded with disfavour.

The Chairman of this Commission, in considering the situation as disclosed by their investigations, says: "I believe that the ultimate solution of the troubles and the evils of compensation insurance is for the State to take over the business, either directly through a State Fund or indirectly by participating membership in a company like the Massachusetts Employees' Insurance Association."

In connection with the present situation in Massachusetts, it may also be noted that the Massachusetts State Branch of the American Federation of Labour, at its annual convention in September last, as a part of its legislative programme for 1916, voted to support a Bill to forbid private companies writing insurance under the "Compensation Act," believing such a measure to be in the interests of the labouring people of the Commonwealth.

It is impossible within the compass of this Report to more than indicate in a general way the nature of the evidence which is before the Committee on this subject, but from a careful consideration of that evidence it is apparent that the casualty insurance companies, from the standpoint of economy, have utterly failed to show as good results as either the mutual companies or the State-administered funds, and this both as to rates of premiums and costs of administration. The economic waste of allowing casualty insurance companies to carry on this

class of insurance unquestionably amounts to many millions of dollars each year, and when we consider that this money is either secured by increased premiums from employers or retained from moneys which otherwise might be paid to injured workmen and their dependents, the advantage in eliminating the waste is apparent. The evidence also discloses that the cost of administration through a State Fund is less than through a mutual insurance company, and that such cost in case of an exclusive State Fund is less than where the State Fund is operated along with competing insurance companies.

Notwithstanding the fact that this Province is favoured with having as local representatives of the casualty insurance companies men who are apparently disposed to co-operate with the proposed legislation, we realize that the companies in question are nearly all extra-provincial companies, many of them English and American corporations whose policies are determined by the men in charge at their head offices, and who are not likely to be materially influenced in shaping that policy by the local situation which might develop in this single Province. For the purpose of judging the probable outcome of permitting these companies to compete in this business here, we have examined the results of such competition elsewhere in places where modern compensation laws are in force, and we find those results, even apart from the question of economy, are often such as would lead us to favour a system other than that developed by such competition.

After considering the information and evidence submitted, and endeavouring to give due weight to the advantages and disadvantages of the different methods of handling this matter of insurance, the Committee is unanimously of the opinion that the system proposed by the Bill to the complete exclusion of casualty insurance companies is by far the best adapted to meet the requirements in this Province. Such a system would, in our opinion, not only save the employers of this Province an immense amount of money, but would contribute greatly to the success of the Act as a whole by eliminating many undesirable features usually attendant on a competitive company system.

It should also be noted in this connection that if the wishes expressed by the two parties most vitally interested in this matter – namely, the employers and the workmen – are to be considered, preference must be given to the State-administered fund. The counsel representing one of the colliery companies before the Committee has asked for the retention of the casualty insurance companies, but with this exception the sentiment among employers appears to be in favour of an

exclusive State-administered fund. The Joint Committee, speaking for a number of the largest associations of employers in the Province, is in favour of a State Fund, coupling with this a representation that the administration expenses under the Act should be paid by the Government. A committee of mine operators representing between thirty and forty metalliferous mines in the interior of the Province has declared in favour of a State-administered system if the proposed Act is to be passed. The British Columbia Federation of Labour and the six different associations of steam railway employees have emphatically recommended the adoption of the exclusive system proposed in the Bill.

To any one who has studied the compensation system as embodied in the more modern Acts, and considered it in connection with the experience in those States where casualty insurance companies have been allowed to participate in the business, it will be readily apparent that a further element must be kept in mind in discussing this question of insurance – namely, that if insurance in stock companies is permitted it would still be necessary to provide some other source of insurance. It would be highly unjust for the Legislature to enact a system of compulsory insurance and leave the employer at the mercy of private insurance companies, first, as to whether his risk would be accepted; and, second, whether, if accepted, it would be taken at a reasonable rate of premium. That insurance must be made compulsory to prove an effective protection to the workman will, we think, be conceded. The Government which imposes such a system should at the same time provide for the employer a source of insurance readily procurable at actual cost. Clearly this cannot be accomplished by leaving the matter in the hands of those whose only interest in the business is in making a personal profit for themselves and a dividend for the company which they represent.

From inquiries made we are convinced that if all the industries of this Province are gathered into one collective system, such as that proposed in the Bill, there is ample scope or background for its successful operation. If, however, these industries were divided up and distributed by reason of a State Fund operating concurrently with some eighteen or more competing stock companies, with their agents actively soliciting business all over the country, the portion of the total business which fell to the State Fund might be far too small to permit the proper working of the law of average. Not only would the cost of operation of the State Fund be increased because of this competition, but the proportion of overhead expenses to the amount of business done would necessarily be larger, and the safety of the fund from the standpoint of insurance might be open

to question. This in our opinion is an additional reason why the State Fund in this Province should be made exclusive.

Such exclusion will no doubt materially affect the business interests of those engaged in liability insurance in the Province. That the Act will also seriously affect the business of the legal profession is beyond question, but we see at present no indications that it will be seriously opposed on this account. No doubt the profession at large will be ready to approve of the Act in its aim to protect the injured workman and his dependents from the evils of the present system, notwithstanding the loss in legal fees entailed. It is to be hoped the insurance-brokers will look at the matter from this aspect as well. We strongly recommend that no third party with conflicting private interests be permitted to come between the employer and the injured workman in their relations as such for the mere purpose of conducting a business for profit.

It should be noted in this connection that as a result of the very thorough investigation made into the merits of this question by Sir William Ralph Meredith, the Legislature in Ontario enacted an exclusive State-administered insurance system. At the hearings held during this investigation both the Canadian Manufacturers' Association and the Dominion Trades Congress were ably represented and were unanimous in supporting exclusive State-administered insurance. Last year the question was fully and ably argued before the Committee on Law Amendments of the Nova Scotia Legislature by counsel representing the insurance companies. Notwithstanding the strong opposition of these companies and the many very ingenious arguments presented by their counsel in support of his contention, the Legislature there decided in favour of the exclusive system and against the retention of the insurance companies in this line of business.

Scale of Compensation

A comparison of the scale of compensation contained in the Bill with scales in force in other places, and which appear to have been found generally satisfactory in actual operation, would not indicate any likelihood of the proposed scale proving unduly burdensome to employers. It will undoubtedly increase in the aggregate the amount of compensation ordinarily paid by employers in this Province, but it will at the same time afford a measure of relief to injured workmen in many cases where heretofore they have suffered great hardship without any adequate consideration from their employers.

The Joint Committee of Employers in their representations before the Committee did not oppose the scale of compensation proposed, alleging that, while it involved a very heavy tax upon the employers through increased premiums, they appreciated the advantage of the Act to the community generally. Some employers who were represented before the Committee did not concur in that view, apparently giving more weight to their immediate personal gain and less consideration to the needs of injured workmen and those dependent on them. The evidence before the Committee from employers who have had actual experience under similar Acts in other places is unanimous in indicating that similar experience here will amply vindicate the members of the Joint Committee of Employers in the progressive and considerate stand which they have taken on this matter.

The representatives of the different labour organizations in the Province have asked for certain increases to be made in the proposed scale of compensation. While their demands, viewed from the standpoint of the workmen, are supported by substantial reasons, the members of the Committee, after considering all interests involved, do not feel justified under the present conditions in recommending any material increase in the scale proposed. The fact that this scale has already been adopted in two of the Canadian Provinces is another element which should have some weight in deciding on its adoption here.

There are one or two minor points, however, that we would like to see amended slightly in favour of the lower-waged workmen and their dependents. From the evidence before us it would appear impossible for widows or invalid widowers to live in this Province on less than \$20 per month without becoming objects of charity. Nor do we think that anything less than \$5 per month can be considered adequate for the support of a dependent child. For these reasons we recommend that the provisions of subsection (5) of section 33 of the Bill reducing these payments to 55 per cent of the monthly wages of the deceased workman be deleted entirely. This flat-rate method of compensation payments to widows and children was adopted from the Washington Act, which makes no such reduction. After having adopted a flat-rate scale without reference to wages, involving as it does a material reduction of compensation otherwise payable to the dependents of higher-waged workmen, we can see no sufficient reason for introducing the percentage reference to wages merely for the purpose of again reducing a flat rate which is already at the lowest minimum possible for the purpose of adequate support.

For similar reasons we recommend that under sections 37 and 39 of the Bill a minimum be fixed of at least \$5 per week payable to workmen who are totally disabled. Under the scale of wages ordinarily prevailing in this Province such a minimum would very rarely be invoked, but we feel that it should be provided to meet the needs in the few instances, mostly among apprentices and women workers, when it would be of advantage.

In connection with the payments to children under section 33, we also recommend that such payments be extended to include invalid children irrespective of the age-limit of sixteen years.

The increase in the rate of assessment necessary for the carrying-out of these suggestions would be trifling, but we feel that the addition would meet some cases which might otherwise result in very great hardship. With the exception of the amendments here suggested, we recommend that the scale of compensation now in force in Ontario be followed.

Notice and Proof of Accidents

In order that proper treatment may be provided promptly in every case of injury to prevent infection, we recommend that express provision be inserted in the Act making it the duty of the injured workman, or some one in his behalf, to give notice of the accident to the employer as soon as practicable after it happens. Such a provision is also important in tending to eliminate "fake" claims which are more readily made where immediate notice of the accident is not required, and it is equally valuable in that it enables the employer to perform the duty which should be imposed on him of promptly notifying the Board, including any local representative of the Board in that vicinity, thus assuring prompt action in the case of every legitimate claim.

Proof of claim should be made as provided in the Nova Scotia Act; and we recommend that it be made the express duty of the attending physician, as it is in Washington and some other places, to give all reasonable assistance to the claimant in making up his application and in furnishing any certificate of proof required, without charge to the workman.

Classification of Industries and Method of Assessments

In adapting the principles of the Bill to the industries in British Columbia, it will, according to the evidence before the Committee, be necessary to materially reduce the number of the classes into which industries are divided in Schedule 1. This may readily be effected by combining a larger number of allied industries into one class, as was done in the Nova Scotia Act. According

to the best advice tendered us, the industries in the Province should be grouped into about ten classes.

The method of assessment provided in the Bill needs also to be entirely readjusted. The Ontario Act, as originally passed, was taken as the basis in drafting the Bill, but the Ontario Board has since found these assessment provisions to be entirely inadequate and unworkable. Material amendments were made at the last session of the Ontario Legislature, and the more recent Nova Scotia Act has made some further changes. We recommend that in redrafting the assessment provisions in the Bill consideration be given to the Ontario amendments and the corresponding provisions of the Nova Scotia Act. In the opinion of the Committee, express provision should be made in the Act:--

(a.) That assessments may be collected by monthly or quarterly calls, with power to the Board to permit a call to lapse in any case where the class funds are found to be sufficient for the time being without the call being made:

(b.) That it shall be the duty of employers to pay assessments when due, without demand:

(c.) That for the purpose of enforcing collection the person for whom work is being done be made equally liable with the contractor for the payment of assessments, and in the same way contractors be made equally liable with sub-contractors:

(d.) That overdue assessments be made preferred debts in cases of insolvency:

(e.) That the Board eventually establish an individual or merit rating system based on the comparative hazard and accident experience of the individual plants:

(f.) That the Board establish each year capitalized reserves on a proper actuarial basis to provide for the payments accruing in future years in respect of all accidents of that year which result in death or permanent disability:

(g.) That adjustments be made at the end of each year not only on the ascertained pay-rolls, but also on the basis of the actual requirements of the class; and that all necessary refunds or credits of any excess collected be made to the respective employers, thus making the system equivalent to insurance at cost.

Assignment or Attachment of Compensation

Referring to section 19 of the Bill, we do not think that attachment of compensation payments should be permitted in any case. In Ontario the provision for assignment of compensation with the approval of the Board has been found of advantage in cases where this is necessary to procure hospital and medical treatment for the injured workman. If a medical-aid provision is inserted in the Bill, we think the provision for assignment of compensation may safely be deleted. We recommend that the words "Unless with the approval of the Board," at the beginning of section 19, be struck out.

Extra-Territorial Jurisdiction

In section 6 of the Bill an attempt is made, following the corresponding section of the Ontario Act, to provide compensation in certain cases for accidents which happen to a workman while he is employed outside of the Province. The evidence before the Committee on this point indicates that the advisability of this provision is questionable. Considerable administrative difficulty has also been experienced where effort has been made to carry out such a provision.

The workman who is injured in a neighbouring Province or State has, of course, a right of action against the employer, or a claim for compensation, according to the laws of the place where the accident occurs. Even though an assessment were collected from the employer here upon a payroll in which the wages of this workman are included, it would be impossible for the Board to effectively protect the employer against such extra-territorial claims. The constitutionality of such a provision is also questioned, one counsel who appeared before the Committee in Toronto, as well as counsel who have appeared here, having expressed the opinion that the Provincial Legislature has no power to tax an employer to provide compensation for an accident which takes place outside of the Province.

The provision in respect of accidents happening out of the Province contained in the Ontario Act as passed has since been amended. Two changes have been made: First, the right to compensation for such accidents is confined to residents of the Province; and, second, where the employer has not chosen to pay his proper contribution to the Accident Fund in respect of the injured workman, the employer is made liable to pay the compensation individually.

Industrial Diseases

The provisions of the Bill relating to industrial diseases adopt the principle of considering such diseases for the purpose of compensation as the equivalent of a personal injury by accident.

Many of these diseases lead to very serious results, frequently involving permanent disability and death. Most of them are developed gradually through the poisons absorbed by the system during the course of the employment. It would appear necessary, in the interests of the workmen as well as employers, that the duty should be imposed on the Board of seeing that no workman is retained in any such employment a sufficient length of time for him to become a chronic sufferer from the disease.

Apparently the provisions of the Ontario Act dealing with industrial diseases, from which those of the present Bill are copied, are taken from the English "Workmen's Compensation Act." The English Act, however, makes ample provision for suspending a workman from his usual employment when that is found to be necessary on account of his having contracted any such disease, the workman being given a corresponding right to compensation. We recommend that provision be made in the Bill for this matter on the basis of the provisions of the English Act.

Administrative Board

The Committee throughout the investigations has given special consideration to the constitution and functions of the Board which will have charge of the administration of the Act. Some of those who have appeared before the Committee in this Province have expressed a doubt as to the likelihood of securing a competent and economical administration through any Board the appointment of whose members is entrusted to the political party or Government from time to time in power. A consideration of the experience in the States visited by the Committee would not confirm the opinion of any who are inclined for this reason to oppose this method of administration. In fact, the consensus of experience to date is sufficient to practically refute such a view. In most of the States visited the character of the administration secured through the existing Boards was emphatically commended and approved. The testimony of the representatives of both employers and workmen was found to be unanimous on this point.

At the same time, the Committee is thoroughly convinced of the importance of the appointment of a competent Board so far as possible free from political influence. Upon the good judgment and ability of the men who have charge of the organization and conduct of this system of

compensation administration will depend very largely its ultimate success. In fact, actual experience has in many cases shown that the personnel of the Board and the judicious administration of the Act have proven to be elements of greater importance in making it a success than have any special provisions peculiar to the Act itself.

A careful consideration of the evidence and representations before us leads us to make the following recommendations as to the constitution and functions of the Board:--

(a.) That the Board consist of three Commissioners:

(b.) That the term of office of the Commissioners be at least ten years, with appointments alternating in such a manner as to ensure there always being at least two members with experience on the Board:

(c.) That provision be made so that the Board may establish its principal offices at such place in the Province as is found to be most convenient from the standpoint of economy in administration and the prompt discharge of its duties:

(d.) That the Board be given absolute power to appoint and dismiss its own employees, subject only to the approval of the Lieutenant-Governor in Council as to salaries:

(e.) That the Board be authorized to make proper investments of the Accident Fund, but that the custody of the fund and securities be vested in the Provincial Treasury in such a manner that the Province will guarantee their safe-keeping:

(f.) That the making of regulations for the proper administration of the Act and the determination of the sufficiency of the Accident Fund be left wholly with the Board and its expert officials, without being subject to the approval of the Lieutenant-Governor in Council:

(g.) That the provisions of sections 60 and 61 of the Bill relating to audit of the Board's accounts and the making of an annual report be retained.

Right of Appeal to the Courts

The consensus of opinion in the different States visited by the Committee was in favour of providing a right of appeal to the Courts from the decisions of the Workmen's Compensation Board. Provision is made for such appeals in practically all of the different States having administrative Boards, but in most places the right is invoked in only a very limited number of

cases. The Ontario Act provides that there shall be no appeal, while in Nova Scotia an appeal is permitted only as to questions of jurisdiction and law.

Representatives of organized labour in this Province have expressed themselves as opposed to the granting of any appeal, preferring that all questions be finally determined by the Board. The consensus of opinion among those employers who have been represented before the Committee appears to be in favour of granting a limited appeal. Such right of appeal with a properly constituted Board would probably be exercised in a very small percentage only of the cases coming before the Board, but there are some who think that the mere existence of the provision for appeal would tend to a feeling of confidence on the part of those immediately affected by the Act that would be wanting if such provision were omitted.

We are of the opinion that a limited appeal would probably not result in any serious disadvantage to any one, but we are equally convinced from a consideration of the evidence before us that an appeal is not necessary for the proper administration of the Act.

Cost of Administration

Practically all those who have appeared before the Committee as representing the interests of employers in this Province have been unanimous in requesting that the entire cost of administering the Act be paid by the Government out of the Consolidated Revenue Fund. We do not know that this proposal is opposed by any of the interests represented, except possibly by the insurance companies.

Throughout the United States the cost of administering the law is in most cases paid by the State. In some instances the immediate cost of administering the State Insurance Fund as a branch of the Board's activities is paid out of the premiums collected, and in New York it is proposed after the Act has been in force three years to charge the whole cost of its administration upon the several insurance-carriers, who in turn will, of course, reimburse themselves by way of premium charge on the employers. In the Provinces of Ontario and Nova Scotia it is uncertain whether the Government will make any material contribution towards the cost of administration further than providing for the expenses of organization and the salaries of the Commissioners on the Board.

In view of the representations which have been made to us, and the great advantages which will result from the Act generally throughout the Province, we recommend that a substantial portion of the cost of administration be assumed by the Government.

Miscellaneous

A number of minor matters which have been called to our attention, and which will naturally be taken care of in a redraft of the Bill without recommendation on our part, are omitted from this Report. There are some matters, however, as to which, without discussing them in detail, we wish to indicate our recommendations, as follows:--

- (a.) That it be made the duty of the Board to assign all industries within the scope of Part I. to some appropriate class irrespective of the number of workmen employed:
- (b.) That ample discretion be given the Board in the determination of average earnings, so that the wage loss of workmen in seasonal occupations may be equitably determined in each case, the provision of the Nova Scotia Act, except as to the maximum of \$1,200, being recommended:
- (c.) That in determining the average earnings or earning capacity of minor workmen, the Board be given discretion to consider any evidence submitted to show that under normal conditions their wages would probably increase:
- (d.) That the provisions taking away former rights of action be made adequate to cover all such rights, either at common law or by Statute, in respect of any accident which falls within the compensation provisions of the Act:
- (e.) That the medical examination of workmen claiming compensation, when required under section 21 of the Bill, be limited to such examinations as the Board deems necessary, and to a place and time reasonably convenient for the injured workman in the discretion of the Board:
- (f.) That if adequate medical-aid provisions are inserted in the Bill, the Board be given power in its discretion, based upon independent expert medical or surgical advice, to suspend compensation in cases where unsanitary practices retarding recovery are wilfully persisted in or where proper medical and surgical treatment is declined:
- (g.) That provision should be made in the Bill permitting an award for facial disfigurements, although the ability to perform the usual work of the occupation has not been otherwise diminished:

(h.) That the nature and limit of all penalties be fixed in the Act and not left entirely to regulations:

(i.) That the Board be given power in its discretion to relieve from penalty:

(j.) That in redrafting the Bill consideration be given to the Ontario amendments of last session and the corresponding provisions of the Nova Scotia Act, and that the Bill be rearranged by the grouping of sections into appropriate divisions dealing with the different phases of the subject:

(k.) That the provisions of Part II of the Bill which modify the application of the doctrine of common employment, assumption of risk, and contributory negligence in industries not within the scope of Part I be retained as a part of the Act.

Appreciation of Assistance

Before concluding this Report, reference should be made to the list which is appended containing the names of the witnesses whose evidence was taken before the Committee at the different places visited. The Committee desires to express to these gentlemen its sincere appreciation for the time and assistance so generously given by them in this connection, and also to thank the officials of employers' associations and labour organizations who in numerous instances extended their courtesy to the Committee in arranging interviews with the gentlemen whose evidence was desired.

Conclusion

We are unable within the space of this Report to submit in detail the reasons for all the recommendations made, or to indicate even briefly the evidence upon which our conclusions are based. In many cases the statement of these reasons is probably unnecessary. In any case where the correctness of our conclusions is questioned or further explanation is required, we shall hold ourselves ready to submit in more detail the evidence and reasons leading to the conclusions in question.

A transcript of the evidence taken, bound in four volumes, is presented herewith. On pages 305-525 of Volume 4 will be found a transcript of the proceedings at the final public meeting of the Committee held at Vancouver. The Appendix to this volume contains copies of the several memoranda submitted on behalf of the interests represented at that meeting.

In concluding this Report, we have only to add that, with the passing of such an Act as here outlined covering adequate medical-aid and accident-prevention features, with a system of insurance entirely exclusive of the expensive and wholly unnecessary competition of casualty insurance companies, with a competent Board composed of members holding office for a considerable term of years and thus freed from immediate political influence, and with a fair degree of co-operation on the part of both employers and workmen, the success of the proposed system is, in our opinion, assured in such a way that it will undoubtedly develop to be a strong contributing element in the upbuilding of the industrial life of the Province.

All of which is respectfully submitted.

AVARD V. PINEO.

DAVID ROBERTSON.

Victoria, B.C., March 1st, 1916. JAS. H. MCVETY.

Appendix

Memorandum of Suggested Medical-Aid Provision for "Workmen's Compensation Act," British Columbia

1. Board to be empowered to provide out of the Accident Fund reasonable medical and surgical aid for all injured workmen at time of injury, and thereafter during disability to cure and relieve from effects of injury; such aid to include necessary transportation, nursing and hospital services, crutches and artificial members.
2. To equalize the cost of such medical aid, employers to be required to deduct from wages of workmen 1 cent for each day or part of day employed and remit same to the Board.
3. Plans of medical aid existing or to be established between employers and workmen which, after ascertaining the views of employer and workmen, the Board approves as being not less effective in the interests of both employer and workmen generally than the provisions of the Act are to be preserved. So long as such approval stands unrevoked the workmen under such plan will not be entitled to claim medical aid from the Board under the Act, nor will they be required to contribute the 1 cent per day to the fund.

4. The Board to have full supervision and control of all medical aid furnished under the provision of Act.

5. The contribution received as above from workmen to be used in defraying the expenses of medical aid; any further amount required for this purpose to be taken by the Board from the Accident Fund or provided in some appropriate assessment from employers generally, except employers operating under a plan approved by the Board under clause 3 above.

The undersigned interests agree to the insertion in the proposed "Workmen's Compensation Act" for British Columbia of a medical-aid provision as above outlined, subject to such amplification or wording as may be found necessary to adapt the same to the Act as finally passed, on the condition that the Act shall also contain a provision for a waiting period to the effect that no compensation other than medical aid shall in any case be allowed for the first three working-days of disability.

For Joint Committee of Employers.

(Sgd.) E.C. KNIGHT.

For British Columbia Federation of Labour.

(Sgd.) A.S. WELLS.

For Railway Brotherhoods.

(Sgd.) M.F. CRAWFORD.

(Sgd.) T.J. COUGHLIN.

Vancouver, December 22nd, 1915.

(The Joint Committee of Employers above mentioned represents the following organizations: The British Columbia Lumber and Shingle Manufacturers' Association; the British Columbia Loggers' Association; the Manufacturers' Association of British Columbia; the Fraser River Cannery Association; Vancouver Chamber of Mines; Granby Consolidated Mining and Smelting Company.)

List of Witnesses whose evidence was taken before the committee of investigation.

CALIFORNIA.

BROWN, CARL G., Manager, California Insurance and Indemnity Exchange, San Francisco, Cal.

FEE, GRANT, President of Building Trades Employers, San Francisco, Cal.

FELLOWS, C.W., Manager, California State Compensation Insurance Fund, San Francisco, Cal.

FRENCH, Hon. W.J., Commissioner, Industrial Accident Commission of the State of California, San Francisco, Cal.

JOHNSON, T., Legislative Agent of California State Federation of Labour, San Francisco, Cal.

ROUNTREE, J.D., Secretary, California Employers' Federation, San Francisco, Cal.
SCHARENBERG, PAUL, Secretary, California State Federation of Labour, San Francisco, Cal.
TYSON, JAMES, of the Crown Lumber Company (Lumber and Shipping Industries), San Francisco, Cal.

MASSACHUSETTS.

ALEXANDER, MAGNUS W., of the General Electric Company, Chairman, Committee on Safety and Sanitation of the National Founders' Association, West Lynn, Mass.
CONWAY, CHARLES T., Treasurer, Massachusetts Employees' Insurance Association, Boston, Mass.
GRANDFIELD, R.E., Secretary, Massachusetts Industrial Accident Board, Boston, Mass.
JOYCE, MARTIN S., Secretary-Treasurer, Massachusetts State Branch American Federation of Labour, Boston, Mass.

NEW YORK.

BALDWIN, F.S., Manager, New York State Insurance Fund, New York, N.Y.
DAWSON, MILES M., Counsellor-at-Law and Consulting Actuary, New York, N.Y.
FONDILLER, RICHARD, Chief Actuarial Clerk, New York State Insurance Fund, New York, N.Y.
LYON, Hon. E.P., Vice-Chairman, New York State Workmen's Compensation Commission, New York, N.Y.
SCHWEDTMAN, F.C., Chairman of Special Committee on Industrial Indemnity Insurance appointed by National Association of Manufacturers of the United States of America, New York, N.Y.

NOVA SCOTIA.

ARMSTRONG, Hon. E.H., Commissioner of Public Works and Mines for Nova Scotia, Halifax, N.S.
BROOKFIELD, S.M., of S.M. Brookfield, Limited, (Contractors and Builders), Halifax, N.S.
DAVIDSON, W.S., Vice-President, Halifax Board of Trade, Halifax, N.S.
HENSLEY, G.W.C., Steamship Agent, Halifax, N.S.
LONGARD, J.P., Builder and Contractor, Halifax, N.S.
MONAGHAN, C.V., Secretary, Moirs Limited (Biscuit and Chocolate Manufacturers), Halifax, N.S.

OHIO.

DONNELLY, T.J., Secretary-Treasurer, Ohio State Federation of Labour, Cincinnati, Ohio.
DUFFY, Hon. T.J., Commissioner, Industrial Commission of Ohio, Columbus, Ohio.

JENNINGS, M., Secretary, Ohio Manufacturers' Association, Columbus, Ohio.

SAVAGE, G.W., Secretary-Treasurer, District 6, United States Mine Workers, State of Ohio, Columbus, Ohio.

WATSON, E.E., Actuary, Insurance Department, Industrial Commission of Ohio, Columbus, Ohio.

YAPLE, Hon. W.D., Chairman, Industrial Commission of Ohio, Columbus, Ohio.

ONTARIO.

BANCROFT, FRED., ex-Vice-President, Trades and Labour Congress of Canada, Toronto, Ont.

BEST, W.L., Chairman, Canadian Legislative Board, Brotherhood of Locomotive Firemen and Enginemen, Ottawa, Ont.

FLOWER, A.E., Secretary, Toronto Builders' Exchange, and Secretary, Provincial Association of Builders' Exchanges, Toronto, Ont.

GANDER, GEORGE, President, Provincial Association of Builders' Exchanges, Toronto, Ont.

GIBBONS, JOSEPH, ex-Official, Trades and Labour Congress of Canada, and of Toronto Street Railway Union, Toronto, Ont.

HARRIS, SAM, President, Harris Lithographing Company, Limited, Toronto, Ont.

HINSDALE, F.W., Consulting Auditor, and Organizing Expert of the Ontario Workmen's Compensation Board, Toronto, Ont.

KINGSTON, GEO. A., Commissioner, Ontario Workmen's Compensation Board, Toronto, Ont.

MEREDITH, SIR WILLIAM R., Chief Justice of Ontario, Toronto, Ont.

OAKLEY, GEORGE, Jr., President, Toronto Builders' Exchange, Toronto, Ont.

PRICE, SAMUEL, K.C., Chairman, Ontario Workmen's Compensation Board, Toronto, Ont.

STEWART, J.F.M., Manager, Point Ann Quarries, Limited, Toronto, Ont.

WEGENAST, F.W., Barrister, and former Solicitor of Canadian Manufacturers' Association, Toronto, Ont.

WRIGHT, ALEX W., Vice-Chairman, Ontario Workmen's Compensation Board, Toronto Ont.

OREGON.

BECKWITH, Hon. HARVEY, Commissioner, State Industrial Accident Commission, Salem, Ore.

CORNWALL, GEORGE N., Publisher, "The Timberman," Portland, Ore.

DOWNARD, W.W., Secretary, Union Meat Company, and President, Portland Creditors' Association, Portland, Ore.

GRAM, C.H., Deputy Labour Commissioner, State of Oregon, Portland, Ore.

HANNA, HUGH S., Special Agent, Bureau of Labour Statistics, United States Department of Labour, Washington, D.C.

KERR, J.B., Attorney-at-Law (Draftsman of Oregon "Workmen's Compensation Act"), Portland, Ore.

MACKENZIE, WILLIAM, Secretary and Business Agent, Steam Engineers' Union, Portland, Ore.

MARSHALL, Hon. WM. A., Chairman, State Industrial Accident Commission, Salem, Ore.

STACK, E.J., Secretary, Central Labour Council, Portland, Ore.

WASHINGTON.

BROWN, J.G., President, International Union of Timber Workers, Seattle, Wash.

CASE, C.R., ex-President, Washington State Federation of Labour, Seattle, Wash.

CLARKE, R.H., Treasurer of the Wheeler-Osgood Company, Lumber Manufacturers, Tacoma, Wash.

DAGGETT, Hon. FLOYD L., Chairman, Washington Industrial Insurance Commission, Olympia, Wash.

DYER, R.M., Vice-President and Treasurer, Puget Sound Bridge and Dredging Company, Inc. (General Contractors, Dredge and Harbour Work, etc.), Seattle, Wash.

GILBERT, P., Secretary, Washington Industrial Insurance Commission, Olympia, Wash.

GRIGGS, E.T., President of St. Paul and Tacoma Lumber Company, Tacoma, Wash.

HIGDAY, H., Secretary and Traffic Manager, Seattle Port Commission, and ex-Commissioner, Washington Industrial Insurance Commission, Seattle, Wash.

MARSH, E.V., President, Washington State Federation of Labour, Everett, Wash.

MOWELL, DR. J.W., Chief Medical Adviser, Washington Industrial Insurance Commission, Olympia, Wash.

NETTLETON, W.B., of Schwager & Nettleton, Inc., Lumber Manufacturers, Seattle, Wash.

REED, M.B., President, Simpson Logging Company, Seattle, Wash.

SAWYER, B.W., Secretary, Employers' Association, Seattle, Wash.

SHORT, WILLIAM, Secretary, District Association of Mine Workers of America, Seattle, Wash.

WISCONSIN.

BECK, Hon. J.D., Commissioner, Industrial Commission of Wisconsin, Madison, Wis.

BRUCE, W.G., Secretary of the Merchants' and Manufacturers' Association of Milwaukee, and Secretary of the Wisconsin Manufacturers' Association, Milwaukee, Wis.

CROWNHART, C.H., Attorney-at-Law, and ex-Chairman of Industrial Commission of Wisconsin, Madison, Wis.

DOWNEY, E.H., Statistician, Industrial Commission of Wisconsin, Madison, Wis.

TARRELL, L.A., Chief Examiner, Industrial Commission of Wisconsin, Madison, Wis.

WEBER, FRANK, Secretary and Business Agent of the Federated Trades Council, Milwaukee, and Organizer for Wisconsin State Federation of Labour, Milwaukee, Wis.