

IWAC Position Paper
Policy 21-112 – Occupational Hearing Loss
Submitted to WorkSafeNB – August 18, 2025

Background

The Injured Workers Advisory Committee (IWAC) appreciates the opportunity to provide input on proposed changes to Policy 21-112 – *Occupational Hearing Loss*. We recognize that this policy plays a crucial role in supporting workers affected by both sudden (traumatic) and gradual (noise-induced) hearing loss in the workplace.

IWAC supports the effort to modernize and clarify the policy and offers the following feedback with a focus on transparency, fairness, and accessibility for injured workers.

1. Clarity of Eligibility Criteria

The proposed updates do a better job of distinguishing between traumatic hearing loss and noise-induced hearing loss (NIHL), including how each is adjudicated. However, IWAC encourages WorkSafeNB to ensure that language throughout the policy remains accessible to the average worker, avoiding clinical or overly technical terms wherever possible.

Recommendation: Ensure plain-language explanations are included in any public-facing materials or communications.

2. Tinnitus as a Secondary Condition

IWAC strongly supports the addition of guidance related to **tinnitus caused by NIHL**.

Tinnitus is a common and debilitating condition that is often minimized. Recognizing it as a legitimate and compensable outcome of hearing damage is a positive step forward.

Recommendation: Consider removing the requirement for “two or more years” of medically documented tinnitus. Workers may not always have this documentation, even if the condition is chronic and linked to an accepted NIHL claim.

3. Out-of-Province Exposure

The updated policy includes references to exposure outside New Brunswick, which is increasingly relevant for workers with mobile or interprovincial employment. The proposed guidance is appreciated, but IWAC suggests additional clarity about how workers can demonstrate the location and nature of their noise exposure, especially if employers no longer exist or records are unavailable.

Recommendation: Include flexibility in evidentiary requirements for historical exposure, recognizing that workers may not have documentation from older workplaces.

4. Timelines and Access to Claims

The policy retains the statutory timeframes for filing hearing loss claims but offers some explanation on how WorkSafeNB may assess delays. IWAC encourages WorkSafeNB to apply this discretion generously in cases where workers were unaware, they had a compensable condition or lacked access to testing or diagnostic support.

Recommendation: Include examples of when exceptions to time limits may be granted, especially for occupational diseases with delayed onset.

5. Audiogram Interpretation and Worker Education

While audiogram data is central to adjudication, many workers do not understand their test results or what constitutes a claimable pattern of hearing loss.

Recommendation: Consider developing a plain-language guide or infographic for workers explaining how audiograms relate to eligibility under Policy 21-112.

Conclusion

IWAC appreciates the efforts of WorkSafeNB to update Policy 21-112 and ensure it aligns with modern standards of care and adjudication. We urge continued emphasis on transparency, fairness, and simplicity for workers navigating the claims process, particularly in invisible injuries like hearing loss.

We welcome ongoing dialogue and thank you for the opportunity to participate in this consultation.

Respectfully,

Four handwritten signatures in different colors (green, blue, black, and orange) are displayed horizontally.

Pam Baker, Paula Garant, Leica Gahan, and Kirk Westfield
IWAC Members