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Legislative Research
Information and Technology Services Division
Room 2520, Whitney Block
Queen's Park
Toronto, Ontario M7A 1A9
Telephone: (416) 325-3675

Recherche législative
Division des services de l'information et de la technologie
Bureau 2520, Edifice Whitney
Queen's Park
Toronto (Ontario) M7A 1A9
Téléphone: (416) 325-3675

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BILL 27, *WORKING FOR WORKERS ACT, 2021* (SUMMARY OF RECOMMENDATIONS)*

Prepared for:

Standing Committee on Social Policy

Prepared by:

Sandra Lopes,
Pia Anthony Muttu, and
Amanda Boyce
Research Officers
Legislative Research

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INTRODUCTION

This document summarizes recommendations presented to the Standing Committee on Finance and Economic Affairs during its public hearings on Bill 27, the *Working for Workers Act, 2021*, held in Toronto and virtually on November 15, 16, 17 and 18, 2021. It also summarizes written submissions received by the Committee Clerk as of 6:00 p.m. on November 18, 2021.

The summary is organized according to the relevant sections of the Act. Witnesses are identified by abbreviations or their last names, which are listed in alphabetical order at the end of the summary.

This document is intended as an aid to Members in their deliberations. It is not a complete historical record of all the evidence received by the Committee, or a comprehensive review of the arguments made by witnesses. Comments have been abbreviated and arguments summarized. Submissions expressing substantially the same point have been grouped together.

For a full account of the evidence presented to the Committee, reference should be made to *Hansard* and the briefs themselves. Please note that draft *Hansard* was not available as this summary was being prepared.

MINISTER'S REMARKS

The Honourable Monte McNaughton, Minister of Labour, Training and Skills Development, appeared as the Committee's first witness. He said that the proposed Bill would build on other efforts to support Ontario workers such as increases to the minimum wage and address some of the recommendations of the Ontario's Workforce Recovery Advisory Committee.

The Hon. McNaughton explained that the Bill would:

- require employers to develop right to disconnect policies (policies that could include clear expectations for response times for and encourage employees to put out-of-office notifications on when they are not working);
- ban employers from using non-competition agreements (while usually legally unenforceable these agreements are sometimes used to intimidate workers);
- require businesses to provide access to washrooms to delivery drivers and couriers; and
- require temporary help agencies and recruiters to get a license, pay an application fee and be listed on a public online database.

The Minister also highlighted changes to the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006* which would streamline language testing requirements and eliminate the requirement for Canadian work experience for professional licenses unless there is an exception granted for public health and safety purposes.

Some Committee members asked that the Minister amend the Bill to include provisions that would reinstate equal pay for temporary workers and make employers liable for the health and safety of temporary workers. It was asked that Schedule 6 be removed.

SUMMARY OF RECOMMENDATIONS

Schedule 1, *Employment Protection for Foreign Nationals Act, 2009*

Recruiters' liability to repay fees (Sched. 1, s. 3; EPFNA, s. 18.1)

Expand liability to include employers of foreign nationals as jointly and severally liable with recruiters to ensure compliance under the EPFNA. Employers drive recruitment demand.

(OCASI, OFL, MWAC, PCLS, WAC)

Ensure that recruiter corporations and others along the chain are held jointly and severally liable.

(OGVG, WAC)

Facilitate anonymous complaints from migrant workers and reverse the onus of proof to require the impugned recruiter to prove that no fees were paid.

(CUPE, Faraday, MWAC, OCASI, OFL, PCLS, WAC)

Employers must be held liable to ensure that they use recruiters who do not charge recruitment fees.

(CUPE)

Other Comments Relating to Schedule 1

Establish a registry of employers that use foreign workers. A registry would be especially helpful for migrant care workers and would allow the Ministry of Labour, Training and Skills Development to effectively monitor and carry out inspections to enforce ESA standards.

(Faraday, OFL, WAC)

Implement significant fines for employers who fail to use a licensed agency.

(WES)

Require licensees to put up significant financial guarantees, such as bonds, for claims that may be brought against them.

(TRIEC, WES)

Require that labour broker licenses be issued only to resident nationals and members of recognized associations of immigration consultants or members of the legal profession. This requirement allows for licensees to be held accountable for recruiting violations.

(OCASI, TRIEC, WES)

Make the continuation of the license contingent on performance and records. Set a cap and differentiate pricing for fees charged to migrants.

(TRIEC)

Obligate recruiting agencies to bring jobseekers that have employment contracts to attend pre-departure orientations conducted by governments.

(WES)

Limit fees that can be legally charged to migrants, differentiate fees by class of work or ensure the employer will pay the fees.

(OCASI)

Schedule 2, *Employment Standards Act, 2000*

Written Policy on Disconnecting from Work (Sched. 2, s. 3; ESA, Part VII.0.1)

Clarify who this provision applies to and who would be exempt. Ensure there are exemptions for those who must respond outside of core hours to dangerous incidents affecting health and safety or the environment.

(OWMA)

Ensure the right to disconnect policy applies to workplaces with 20 or more employees, not 25 or more.

(OSG)

Require employers of all sizes, including small employers with under 25 employees, to have a disconnecting from work policy.

(TAIC)

Institute a statutory right to refuse overtime, including time spent responding to, or being available to respond to, work-related e-communications.

(MWAC, PCLS, WAC)

Introduce an enforcement mechanism penalizing the employer for each time a worker is contacted after hours.

(TAIC)

Remove this provision or amend to exempt essential customer services and require that the policy be highly flexible (e.g., form, nature, and content) to help mitigate any unintended consequences.

(CBA)

Ensure that the final wording of the right to disconnect provisions take into account the fact that many companies operate globally across several time zones.

(CCI)

Develop a comprehensive communications plan to ensure businesses are aware of their obligations under any applicable right to disconnect legislation and are equipped with the tools they need to implement it.

(CCI)

Provide exemptions from the right to disconnect provisions for certain professions, including lawyers, who are currently exempt from other provisions of the *Employment Standards Act* such as overtime provisions.

(FSL)

Define minimum standards for the right to disconnect in the proposed legislation, not in regulations thereunder.

(AMAPCEO)

Mandate that occurrences where businesses require employees to monitor communications or respond after hours, be irregular, and mandate that on-call pay be provided to impacted employees.

(AMAPCEO)

Rescind the architectural exemptions related to the *Employment Standards Act* to reflect the government's commitment to the right to disconnect. Include in Bill 27 a provision to remove or trigger the removal of clause 2(1)(a)(i) of O. Reg 285/01: When Work Deemed to be Performed, Exemptions and Special Rules, a regulation made under the ESA.

(OAA)

Exempt smaller businesses from the requirement to develop a written policy on disconnecting from work. We are concerned that once this policy is enacted, it will be expanded to include more businesses in the future.

(CFIB)

Allow an employer the flexibility to account for individual workplace conditions in its disconnecting from work policy. The legislative requirement to develop and implement a disconnecting from work policy must not create rights or obligations in excess of those established in the ESA and its regulations.

(CME)

Ensure that any period during which the employee is not defined to be "disconnect[ed] from work" is not inadvertently deemed to be work performed for the employer.

(CME)

There is no need to introduce any new prohibition against reprisal or complaint and enforcement mechanisms specific to the disconnecting from work policy. Existing provisions of the ESA already provide the means to enforce compliance with an employee's rights and an employer's obligations.

(CME)

Include strong protections for workers' privacy and personal information and for employees' rights to be free of employer or work-related monitoring, surveillance, and intrusion in their personal spaces and lives.

(MWAC, OFL, PCLS, WAC)

Non-Compete Agreements (Sched. 2, s. 4; ESA, Part XV.1)

Note that the prohibition of non-compete agreements may lead to an increase in non-solicitation and confidentiality agreements.

(OSG)

Remove this provision or, at least, add language exempting employees in senior roles who have access to proprietary, confidential information.

(CBA)

Clarify certain exceptions to the prohibition and ensure carve-outs for non-solicitation clauses and non-disclosure clauses be made apparent in the legislation.

(CCI)

Note that we support this provision.

(FSL)

Note that there may be unintended consequences to banning non-compete agreements such as poaching from small businesses.

(CFIB)

Permit non-compete agreements where the employee is compensated for agreeing to it. Prohibit non-compete agreements in the industries struggling to attract talent. Exempt executives, salespeople and other key employees from the prohibition of non-compete agreements.

(CME)

Licensing (Sched. 2, ss. 8-10; ESA, Part XVIII.1)

Note that we support the prohibitions relating to unlicensed recruiters and temporary help agencies.

(OGVG)

Place more onus on host employers in the event of a critical injury to or death of a temporary worker.

(OBT)

Set security as a condition of licensing and establish that the security required be no less than \$25,000.

(CUPE, Faraday, MWAC, OCASI, OFL, PCLS, WAC)

Set monetary penalties as effective deterrence against non-compliance with licensing requirements. Recommend setting automatic fines at \$15,000 for a temporary help agency's failure to obtain a license and an employer's failure to use a licensed agency.

(CUPE, MWAC, OCASI, PCLS, WAC)

Note that establishing licensing for recruiters is the beginning of a process that will give employers and employees greater confidence and is good news for foreign workers. The Bill's provisions have actual teeth to address those who are breaking the law.

(TIAO)

Proactively enforce licensing provisions. This process should not be complaint-based.

(Faraday)

Remove the reference to "not knowingly." This creates an incentive for employers to not ask.

(Faraday)

Establish recruiter registry listings along with listings for temporary help agencies to show which entity is currently in good standing.

(OGVG)

Institute a mandatory licensing system including a registry of employers of workers with temporary work permits and/or employers who use the services of licensed recruiters, wherein licences are not transferable or assignable.

(CUPE, Faraday, MWAC, PCLS, WAC)

Other Comments Relating to Schedule 2

Limit the length of employment through temporary agencies to three months.

(UFCW, WAC)

Provide other supports for workers including paid sick days, protections for those in the gig economy, and the right to unionize for agricultural workers.

(UFCW)

Close loop holes that allow employers to use temporary workers in order to avoid liability for health and safety.

(IAVGO)

Require the Ministry of Labour, Training and Skills Development to engage with stakeholders involved in the Temporary Foreign Worker Program (TFWP), including the OFVGA and the Foreign Agricultural Resource Management Services, during the development of *Employment Standards Act* regulations related to “recruiters” to ensure that they do not unfairly burden individual farmers hiring foreign nationals for their own farm through the TFWP.

(OFVGA)

Consult with the OFVGA during the development of future regulations related to the licensing of temporary help agencies, given the importance of this short-term labour supply in the highly season- and weather-dependent fruit and vegetable sector.

(OFVGA)

Legislate comprehensive, permanent, employer-delivered paid sick days for workers.

(AHC)

Amend s. 2.1(2) of Regulation 285/01 to incorporate all parts of the *Employment Standards Act, 2000* as applying to the Crown, including the proposed Part VII.0.1 – Written Policy on Disconnecting from Work.

(AMAPCEO)

Schedule 3, *Fair Access to Regulated Professions and Compulsory Trades Act, 2006*

Expedited processes in case of emergency (Sched. 3, s. 4; FARPCTA, s. 8)

Limit the application of the proposed s. 8(2) of the FARPCTA to contexts where a regulated profession is unwilling to execute its statutory authority to mitigate the impact of the emergency on registration.

(LSO)

Canadian experience (Sched. 3, s. 5; FARPCTA, s. 10.2)

Eliminate the requirement of 12 months’ Canadian experience for professional engineers. It is an artificial barrier. Experience and education are not the same. Proposed changes will solve part of the problem but will not address all the challenges facing foreign-trained engineers in Ontario.

(OSPE)

Include health-regulated professions.

(ITPO, MWAC, OCASI, OFL, PCLS, TRIEC, WAC, WES)

Note that we support the removal of one of the most significant barriers for internationally trained professionals: lack of Canadian experience. It is simply not good enough to welcome newcomers; we need to ensure they can use their skills in Canada.

(ACHEV)

Define what “Canadian work experience” means. Public Accounting License holders, which represent a small minority of accountants, require Canadian-specific experience and expertise to protect the public and to meet the requirements of certain international agreements.

(CPAO)

Note that Canadian experience requirements in relation to the practice of architecture align with legislative requirements set out in the *Architects Act* to serve and protect the public interest.

(OAA)

Application for exemption (Sched. 3, s. 5; FARPCTA, s. 10.2 (2))

Ensure that exemptions to work experience are stringent. Regulatory bodies should be required to demonstrate why the risks mitigated through work experience cannot be mitigated in other ways such as through education, examination or competency assessment.

(ACEC-O)

Amend the exemption clause to include public protection.

(CPAO)

Compliance orders, Minister (Sched. 3, s. 8; FARPCTA, s. 27.1)

Specify that this provision only applies to internationally trained individuals. As written, it conceivably prohibits any experiential requirements that are principally focused on exposing the applicant to experiential competencies relevant to Canadian practice, including such programs as the Articling program, the Law Practice Program or the Integrated Practice Curriculum requirement.

(LSO)

Authority to make regulations or by-laws (Sched. 3, s. 11; FARPCTA, s. 31(2))

Limit the application of the proposed s. 31(2) of the FARPCTA so that it does not unduly interfere with the Law Society of Ontario's board to regulate the legal profession.

(LSO)

Clause 34 (1) (c) of the Act is repealed and the following substituted (Sched. 3, s. 14; FARPCTA, s. 34)

Ensure that timelines in regulation do not exceed one year. This will not be onerous for Professional Engineers Ontario, which is the province's engineering regulatory body.

(ACEC-O)

Set clear time limits. Require regulatory bodies to guarantee timely assessments/registrations and occupational licensing within an appropriate timeframe.

(MWAC, OCASI, OFL, PCLS, TRIEC, WAC, WES)

Amend clause 34(1)(c) to ensure that time limits cannot be imposed if they do not protect the public interest or would impair the regulated profession's ability to carry out its statutory functions, duties or powers.

(LSO)

Supporting access (Sched. 3, s. 6; FARPCTA, s. 17)

Include the provision of information about financial supports that may be available to support registration.

(WM)

Other Comments Relating to Schedule 3

Use oral reviews of a worker's experience and "hands on" testing of skills as an alternative to the current trade equivalency process.

(OBT)

Consider OSPE's proposed changes to the *Professional Engineers Act* and Professional Engineers Ontario (PEO), the licensing and regulating body for professional engineering, to ensure that PEO becomes a fair regulator.

(OSPE)

Encourage Ontario to enter into agreements with other countries to facilitate the entry of foreign skilled workers and include a process for these workers to be integrated into the labour market. Concluding agreements with countries where English is not a barrier may be the first step.

(CAPIC)

Suggest a tiered licensing procedure to ensure foreign-trained workers meet Canadian standards.

(CAPIC)

Note that this schedule will help skilled immigrants find employment faster. More timely and suitable employment improves immigrants' mental health, creates a better standard of living for their children, increases tax revenues, improves Canada's brand internationally and ultimately promotes a more inclusive and equitable society.

(WM)

Note that this schedule will help recruit skilled and experienced engineers to be employed in a number of areas including in public infrastructure projects.

(ACEC-O)

Note that this schedule will help reduce barriers to tradespersons, helping them to get access to jobs and careers that match their skills and experience. It will also help address shortages in the sector.

(GCAT, OHBA)

Consult with the College of Early Childhood Educators and other regulatory bodies on the details of any regulations enacted under the FARPCTA.

(CECE)

Require the Royal College of Dental Surgeons of Ontario to provide an alternative licensing pathway for internationally trained dentists.

(ITDAC)

Mandate that the National Dental Examining Board of Canada have one standard of competency for dentistry in Canada.

(ITDAC)

Eliminate the equivalency process and allow internationally trained dentists to take the certification exams that Canadian dentists take.

(ITDAC)

Create an independent appeal body through the Office of the Fairness Commissioner to allow judgements and actions to be taken against organizations not abiding by the principles of transparency, objectivity, impartiality, and fairness.

(ITDAC)

Give the Office of the Fairness Commissioner the power to impose consequences on organizations that are not complying with their principles.

(ITDAC)

Schedule 4, *Ministry of Agriculture, Food and Rural Affairs Act*

Collection and use of information (Sched. 4, s. 2; MAFRAA, s. 4.1)

Note that we support section 4.1 but that its implementation must be done in as reasonable a way as possible so that data can be readily shared while recognizing that confidentiality is necessary and there must be a purpose for gathering this data.

(OGVG)

Oppose Schedule 4 due to its expansive scope of powers to collect information on migrant workers who may be vulnerable because of their precarious immigration status. These workers may be concerned that information will be shared with Canada Border Services Agency or other federal immigration agencies.

(WAC)

Define “personal information” more broadly to include business information when the business and personal information are the same information, or when the business information could be used to obtain the personal information of the business owner(s) or employee(s).

(OFA)

Stipulate that personal information may only be collected where, after considering the privacy interests of the individuals and the manner in which their personal information will be protected, the minister or their designate has determined that there is a public interest in collecting the personal information.

(OFA)

Re-draft paragraph 1 of subsection 4.1 (2) to limit and define the scope to address the Minister’s specific desired purposes for the collection and use of personal information. Alternatively, if paragraphs 2 and 3 adequately address the desired objectives, delete paragraph 1 altogether.

(IPCO)

Re-draft paragraph 4 of subsection 4.1(2) to narrow the scope of the regulation making authority to further limit the purposes that may be prescribed in regulation to those that are directly related to the Minister’s specific desired objectives.

(IPCO)

Other Comments Relating to Schedule 4

Remove schedule 4.

(MWAC, OCASI, OFL, PCLS, WAC)

Amend the *Freedom of Information and Protection of Privacy Act* to ensure that its provisions are consistent with the relevant provisions of the *Ministry of Agriculture, Food and Rural Affairs Act*.

(OFA)

Provide for a transparent and public regulation making process in the Act, similar to section 74 of the Personal Health Information Protection Act and section 65.2 of FIPPA.

(IPCO)

Schedule 5, *Occupational Health and Safety Act*

Duties of Owners — washroom access (Sched. 5, s. 1; OHSA, s. 29.1)

Clarify that this provision would include waste collection workers who can spend the full day in their vehicles.

(OWMA)

Note that we support this provision which improves access to washrooms.

(UFCW)

Reconsider legislative amendments to include transit workers. They face challenges accessing safe and clean restrooms while on duty due to their unpredictable schedules, long routes, and lack of access to facilities.

(ATUC)

Ensure that the access to washrooms provisions apply to the long-haul trucking industry.

(SPRA)

Remove exceptions that state access to a washroom at a workplace is not required if providing access would “not be reasonable or practical.” The phrase is exceptionally ambiguous and wide.

(CUPE)

Establish through regulation a narrow list of legitimate exceptions to providing delivery workers access to washrooms while working.

(WHS LC)

Add a provision that states that access to a washroom at a workplace is not required for reasons specified in legislation, or if the washroom is in, or can only be accessed through, a private dwelling.

(WHS LC)

Other Comments Relating to Schedule 5

Require full-scale protection of gig workers.

(CUPE, OFL)

Adopt and enact the provisions as set out in the Gig Workers' Bill of Rights.

(CUPE, MWAC, OFL, PCLS, WAC)

SCHEDULE 6, *WORKPLACE SAFETY AND INSURANCE ACT, 1997*

Distribution of Surplus (Sched. 6, s. 3; WSIA, s. 97.1)

Use the WSIB surplus to better support injured workers. Examples highlighted by witnesses included for example:

- ending the practice of deeming;
- investigating and penalizing claim suppression;
- allocating more funding towards ensuring that workers impacted by an occupational disease are appropriately compensated;

- restoring Loss of Earnings (LOE) benefits from 85% of net average earnings to 90%;
- restoring the percentage of LOE benefits set aside as retirement investment for permanently injured workers to 10%;
- revising the standard for mental stress injuries to align with that of physical injuries;
- supporting workers impacted by the pandemic; and,
- providing better treatment services for injured workers.

(ETFO, Fink, Hobbs Martell, IAVGO, IWA4J, IWCLC, ODRA, ONA, ONIWG, UFCW, USW)

Support allowing responsible employers to benefit from the distribution of surplus funds but there is a need to create a proper strategy to give good employers premium relief.

(OBT)

Note that we are supportive of the proposed changes to redistribute surplus employer funds back to employers. The WSIB has been more than 100% fully funded for the last three years, which means Ontario employers have essentially been overpaying for their WSIB coverage.

(CME)

Do not proceed with this change. It could encourage claim suppression. Invest instead in the audit process.

(IAVGO, IWCLC, WHSLC)

Allocate some funding to post-secondary institutions to better identify the causes of occupational disease, in order to focus on the prevention of injury.

(OSG)

Note that this provision takes money from workers and gives it to the workplaces that caused the injuries. It also threatens the stability of the WSIB over the long run.

(CUPW)

Require a consultation before the WSIB can consider itself in a surplus position and to determine how any funds are distributed.

(IWCLC, WHSLC)

Reduce the proposed surplus funding corridor from 115% to 125%, to 105% to 110%.

(COCA, CME, OBC)

Re-direct any extra resources to support employment of Board staff, training WSIB adjudicators, payment of benefits and the provision of education and training needed to assist workers with returning to the workforce in a psychologically and physically safe way.

(ONA)

Instead of enacting Schedule 6 to allow the return of surplus funds to employers, reform the WSIB to ensure that claims are reviewed and adjudicated fairly and appropriately, and not denied erroneously or mismanaged.

(Fink, Hobbs Martell, Laho, Landry)

Return surpluses annually in full to affected businesses by direct payments rather than by WSIB account credits.

(CFIB)

Section 100 of the Act is amended by adding the following clauses (Schedule 6, s. 4; WSIA s. 100)

Require consideration of the inadequacies of the workers' compensation system before any "surplus distribution" to employers is considered.

(IWCLC)

Agreement re administration of Part VII (Schedule 6, s. 5; WSIA s. 159)

Note that we support this provision. It would allow the province to contract out the collection of premiums to the Canada Revenue Agency, reducing costs for businesses and allowing WSIB to refocus on efforts that are core to its mandate.

(CPA)

Specify that this provision only allows the Canada Revenue Agency to collect premiums in order to prevent privatization.

(USW)

General Comments Relating to Schedule 6

Schedule 6 must be removed from Bill 27. It is accelerating the erosion of workers' access to WSIB benefits. If passed, Schedule 6 could be paying employers that use temporary help agencies to avoid liability and reward bad employment practices.

(CUPE, ODRA, OFL, USW, WAC)

Remove Schedule 6 and its provisions that would allow surpluses to be distributed to businesses.

(CUPE, MWAC, OFL, ONA, PCLS, WAC, WHSLC)

Remove Schedule 6 and use the surplus money to improve the level of benefits already paid under the WSIA. Extend coverage of the WSIA to employers not currently mandated to participate.

(TAIC)

Note that Schedule 6 is the biggest concern in Bill 27. Injured workers are facing long-term poverty and injured foreign workers would also not benefit from WSIB.

(ONIWG)

Note that Schedule 6 poses challenges in the WSIB claims process when it is already challenging to obtain payments for transit workers who are injured or assaulted on the job and puts these workers in greater debt as they wait for payments.

(ATUC)

Pass regulations on temporary help workers under section 83(4) of the WSIA to protect temporary foreign workers.

(CUPE, OFL, WAC)

Expand eligibility for mental health claims. WSIB has a high refusal rate for mental health claims and it will take years to fully appreciate the amount of stress experienced by frontline health workers and long-term care workers during the COVID-19 pandemic.

(CUPE)

Grant entitlement for occupational diseases when they exceed the level in the community.

(ODRA)

WSIB should use available evidence, including that gathered by workers and communities on occupational diseases in the workplace and must not wait for scientific certainty.

(ODRA)

Expand the list of compensable diseases that are presumed to be work-related.

(ODRA)

Accept that exposures to multiple carcinogens or irritants can combine to cause disease.

(ODRA)

Review the reasons that so many WSIB claims have been denied and simply follow the policies that have been set for some illnesses such as gastroesophageal cancer.

(OBT)

End deeming.

(IWCLC, ONIWG, USW)

Expand WSIB coverage to other industries.

(IWCLC)

Delegate the authority to develop a broad suite of funding policies to the WSIB, as opposed to having them prescribed by regulation, and require the WSIB to consult with stakeholders.

(COCA, OBC)

Amend the *Workplace Safety and Insurance Act* to specify that a 100% funding level must be maintained.

(OBC)

Impose reasonable timeframe requirements (i.e., two months after submissions are received) for the issuance of appeal decisions at all levels and hire more staff where necessary to make this possible.

(Fink, Kasman)

Pursue non-compliance with the WSIA and arrears in the normal manner and render all Schedule 1 employers eligible to receive any surplus.

(OBC)

Allocate surpluses across the board on a pro-rata basis based on premiums.

(OBC)

Distribute surpluses as a surplus funding credit, clearly identified on statements as a one-time credit.

(OBC)

Withdraw Schedule 6 and immediately hold discussions with workers and employer representatives to determine the proper dispersal of the surplus funds.

(Paterson, Tupker)

Adopt the recommendation of the Demers Report to recognize diseases resulting from exposures to multiple carcinogens/irritants (i.e., cancers, COPD, etc.) rather than focusing on single separate exposures.

(IWCLC, ODRA, USW)

Where an employer uses temporary agency workers (temps) and a temp is injured while working on their premises, attribute accident costs and increases in WSIB premiums to the employer, not the temporary help agency.

(WHS LC)

Restore Non-Economic Loss rates to more accurately and realistically rewarded permanent impairments. Increase the quantum of non-economic loss awards.

(Fink, IWA4J, IAVGO, IWCLC)

GENERAL COMMENTS

Consult those that represent the voice of workers in the development of legislation that affects workers.

(CUPE, OFL)

Note that we support measures introduced under Bill 27 to protect workers.

(CAPIC)

Note that injured workers were not consulted in the creation of Bill 27.

(ONIWG)

Listen to constituents in Members' ridings.

(ODRA)

Note that we support this Bill, including provisions around disconnecting from work and non-compete agreements.

(OBT)

Note that we appreciate the proposed amendments in Bill 27, particularly those found in Schedules 1, 2, and 4.

(OGVG)

Pass this bill. It will make Ontario competitive internationally to attract workers to the Province.

(OWMA)

Work with the Canadian Payroll Association and other stakeholders to create a payroll burden reduction advisory council.

(CPA)

Amend the *Employer Health Tax Act* to allow new exemption amounts to be released by June 30th, and an instalment payment threshold.

(CPA)

Re-examine a range of factors in work as they are found in the trucking sector, such as a lack of sufficient places to stop and rest along the highways and an elevated risk of truck collisions when drivers are tired, and whether truck drivers are classified as employees or independent contractors.

(SPRA)

Amend the *Professional Engineers Act* to facilitate the structural and regulatory changes to the governance and operations of the Professional Engineers of Ontario, as recommended by PEO's Chief Legal Counsel.

(OSPE)

Amend the *Professional Engineers Act* to require certain ongoing, mandatory Continuing Professional Development activities on the part of professional engineers.

(OSPE)

Amend the *Chartered Professional Accountants of Ontario Act, 2017* to limit the use of protected designation to those explicitly prescribed by the legislation.

(ACCA)

Change the *Chartered Professional Accountants of Ontario Act, 2017* to allow for the use of the CGMA designation, used for a unique group of management accountants with advanced proficiency in finance, operations, strategy, and management. The change will allow all designation holders to publicly use their credential without the financial burden and bureaucracy of an additional membership.

(CIMA)

Delay all minimum wage increases until fulsome consultations have been held and an independent economic impact analysis has been conducted. Lower the costs that are going up. Otherwise, any gains in minimum wages will be offset by higher prices.

(CFIB)

Provide a multi-faceted plan to tackle the challenge facing the current and future labour market: a lack of applicants.

(CFIB)

WITNESS LIST

Abbreviation	Organization/Individual	Date of Appearance
ACCA	Association of Chartered Certified Accountants	written submission
ACEC-O	Association of Consulting Engineering Companies – Ontario	November 17, 2021, written submission
ACHEV	Achev	November 18, 2021
AHC	Alliance for Healthier Communities	written submission
AMAPCEO	Association of Management, Administrative and Professional Crown Employees of Ontario	written submission
ATUC	ATU Canada	November 18, 2021
CAPIC	Canadian Association of Professional Immigration Consultants	November 16, 2021, written submission
CBA	Canadian Bankers Association	written submission
CCI	Council of Canadian Innovators	written submission
CECE	College of Early Childhood Educators	written submission
CFIB	Canadian Federation of Independent Business	written submission
CIMA	Chartered Institute of Management Accountants, Canada Inc.	written submission
CME	Canadian Manufacturers & Exporters	written submission
COCA	Council of Ontario Construction Associations	written submission
CPA	Canadian Payroll Association	November 17, 2021, written submission
CPAO	Chartered Professional Accountants of Ontario	written submission
CUPE	Canadian Union of Public Employees	November 16, 2021, written submission

Abbreviation	Organization/Individual	Date of Appearance
CUPW	Canadian Union of Postal Workers	November 17, 2021
ETFO	Elementary Teachers Federation of Ontario	written submission
Faraday	Fay Faraday	November 17, 2021
Fink	Richard Fink	written submission
FSL	Fleet Street Law	written submission
GCAT	General Contractors' Association of Toronto	written submission
Hobbs Martell	Janice Hobbs Martell	written submission
IAVGO	IAVGO Community Legal Clinic	November 17, 2021, written submission
IPCO	Information and Privacy Commissioner of Ontario	written submission
ITDAC	Internationally Trained Dentists Association of Canada	written submission
ITPO	Internationally Trained Physicians of Ontario	written submission
IWA4J	Injured Workers Action for Justice	written submission
IWCLC	Injured Workers Community Legal Clinic	November 17, 2021, written submission
Kasman	Sheldon Kasman	written submission
Laho	Eugene Laho	written submission
Landry	Gerald Landry	written submission
LSO	Law Society of Ontario	written submission
MWAC	Migrant Workers Alliance for Change	November 17, 2021, written submission
OAA	Ontario Association of Architects	written submission
OBC	Ontario Business Coalition	written submission
OBT	Ontario Building Trades	November 16, 2021

Abbreviation	Organization/Individual	Date of Appearance
OCASI	Ontario Council of Agencies Serving Immigrants	written submission
ODRA	Occupational Disease Reform Alliance	November 16, 2021, written submissions
OFA	Ontario Federation of Agriculture	written submission
OFL	Ontario Federation of Labour	November 16, 2021, written submission
OFVGA	Ontario Fruit & Vegetable Growers Association	written submission
OGVG	Ontario Greenhouse Vegetable Growers	November 18, 2021
OHBA	Ontario Home Builders' Association	November 17, 2021
ONA	Ontario Nurses' Association	written submission
ONIWG	Ontario Network of Injured Workers Groups	November 16, 2021, written submission
OSG	Occupational Safety Group	November 17, 2021
OSPE	Ontario Society of Professional Engineers	November 16, 2021, written submission
OWMA	Ontario Waste Management Association	November 17, 2021
Paterson	Janet Paterson	written submission
PCLS	Parkdale Community Legal Services (joint submission with Migrant Workers Alliance for Change and Workers' Action Centre)	written submission
SPRA	SPR Associates	written submission
TAIC	Toronto Area Interfaith Council	written submission
TIAO	Tourism Industry Association of Ontario	November 16, 2021
TRIEC	Toronto Region Immigrant Employment Council	November 17, 2021, written submission

Abbreviation	Organization/Individual	Date of Appearance
UFCW	United Food & Commercial Workers Canada	November 17, 2021
USW	United Steelworkers	November 17, 2021, written submission
WAC	Workers' Action Centre	November 16, 2021, written submission
WES	World Education Services	written submission
WHSLC	Workers' Health and Safety Legal Clinic	written submission
WM	Windmill Microlending	November 17, 2021