



December 10, 2015

Hon. MaryAnn Mihychuk, P.C., M.P.
Minister of Employment, Workforce Development and Labour
Employment, Workforce Development and Labour
140 Promenade du Portage
Gatineau, Quebec K1A 0J9

Dear Minister:

In October, the Canadian Chamber of Commerce concluded its 86th Annual General Meeting (AGM) in Ottawa. A major highlight of the Canadian Chamber's AGM is the Policy Session. It is during the Policy Session that resolutions submitted by local chambers of commerce and boards of trade from throughout Canada are debated and voted on by accredited delegates. Once approved, these resolutions become policy of the Canadian Chamber for the following three years. In 2015, our delegates issued a clear and decisive national policy mandate that we intend to pursue vigorously with the federal government over the coming months.

Our renewed national policy mandate includes the following issues that fall within your portfolio.

Make Significant Changes to Address Issues in Foreign Worker Programs

The federal government's Temporary Foreign Worker Program (TFWP) and Canada's Provincial Nominee Programs are important components of Canada's labour strategy. However, changes in how the programs are implemented and integrated federally are urgently needed. Companies create jobs and it is important to avoid increasing barriers to employment. New measures governing the TFWP threaten the employment of Canadians whose employers hire temporary foreign workers by limiting their ability to meet customer demand. The Chamber requests the government take into account the different economic realities of businesses in the country and make significant changes to the TFWP for trades and occupations, industries and communities facing labour shortages.

We recommend the federal government make several changes including using the TFWP as a true temporary worker program for immediate shortages; expanding the Canadian Experience Class to give low- and semi-skilled temporary foreign workers the right to apply for permanent residency after three years of work experience in Canada; implementing a process for notifications regarding Labour Market Impact Assessments (LMIAs); and introducing process efficiencies; review the National Occupation Classification (NOC) Code processes in all provinces and territories, among other recommendations.

Office of the President and Chief Executive Officer | Cabinet du président et chef de la direction

The Canadian Chamber of Commerce | La Chambre de commerce du Canada

420 - 360 rue Albert Street | Ottawa, ON K1R 7X7 | T: 613.238.4000 | F: 613.238.7643 | info@chamber.ca
Chamber.ca | [Facebook](#) CanadianChamberofCommerce | [Twitter](#) @CdnChamberofCom

I have also written to Minister McCallum regarding the preceding resolution as its subject matter is relevant to his portfolio.

Creating Pan-Canadian Training and Certification Standards

Each province and territory develops their own training standards and certification for various apprenticeship occupations, creating duplication and waste. Harmonizing training and certification standards across Canada would help improve labour mobility, address skilled shortages in various occupations, and best meet future labour needs of business. Provinces, territories and the federal government have collaborated through the Canadian Council of Directors of Apprenticeship (CCDA) in harmonizing training and certification standards through the Interprovincial Standards Red Seal Program, which is an onerous, duplicative and expensive superstructure. In November 2014, the Forum of Labour Market Ministers (FLMM) committed to making progress on harmonizing apprenticeship programs. Other bi-lateral harmonization efforts between certain provinces seem to be a poor use of limited resources, when a national approach would be the best option.

The Canadian Chamber urges the federal government to work with provinces/territories, continue to aggressively migrate towards developing pan-Canadian training standards for various occupations where certification is required, among other measures.

Federal Support for Transition in the Seafood Processing Industry

Certain federal programs are creating avoidable labour shortages at seafood processing plants in Atlantic Canada. Regulations associated with the Temporary Foreign Worker (TFW) and Employment Insurance (EI) programs threaten to materially reduce the availability of processed seafood because of a loss of processing capacity. The seafood sector in Atlantic Canada is a multi-billion dollar industry, employing over 20,000 people, predominantly in communities characterized by aging populations and a large number of seasonal employees receiving EI benefits. Without policy changes and transition programs, seafood processors will be affected and the impact on Canadian workers and rural communities will be magnified due to their smaller populations.

The Canadian Chamber recommends the federal government take several steps to address this threat, including completing a labour market analysis of the industry; adjusting programs and policies with respect the labour market conditions in rural agri-food economies; freezing the cap on TFWs working at processing plants at 30% for four years to allow for investment in technology and expansion of local recruiting programs; recognizing the sector in order for qualifying TFWs to receive comparable treatment under the Seasonal Agricultural Worker Program (SAWP); and developing programs to assist with necessary increases in staffing envisaged under a Canada and European Union Comprehensive Economic and Trade Agreement (CETA) tariff reduction environment, among other measures.

Supporting Canadian Students' Transition to Employment Through Work Placements

If Canada is to successfully tackle its skills gap and ensure its economic growth, we have to give special attention to the largest cohort of labour force entrants each year: young people. Across the country, there is a growing sense that Canada needs to better align its education and training systems to labour market needs. One practical way to improve that alignment is through work-integrated learning such as co-op programs, internships and field placements during post-secondary education.

While financial supports are not the only strategy to encourage employer participation, they are an important tool for government to recognize and encourage the valuable role of work placements during students' educational experience. Currently, Ontario and Manitoba offer refundable tax credits to employers who hire co-op students in paid placements. The Canadian Chamber recommends the federal government provide financial incentives to employers to offer paid work-integrated learning placements to students during post-secondary education, giving special consideration to small and medium-sized businesses and to those who have not previously offered work placements.

I have also written to Minister Duncan regarding this resolution since your mandate letter indicates you will be working together regarding helping employers create more co-op placements.

A copy of the complete text of these resolutions is attached. I would welcome an opportunity to discuss these policy issues with you in person.

Sincerely,

A handwritten signature in black ink, appearing to read "Perrin Beatty". The signature is fluid and cursive, with a large initial "P" and a long horizontal stroke extending to the right.

Perrin Beatty
President and Chief Executive Officer

Attachments