



March 28, 2019

Attention: The Honourable Minister of Labour for British Columbia Harry Bains, MLA
Submitted Via Email: ESARReview@gov.bc.ca

The Honourable Harry Bains, MLA
BC Minister of Labour
PO Box 9064, Stn Prov Govt
Victoria, BC, V8W 9E2

Dear Minister Bains,

RE: BCLI Employment Standards Act Reform Project; Sick and Family Responsibility Leave; Statutory Holiday Pay

My name is Peter Bourke, Executive Director of the Columbia Valley Chamber of Commerce, and I am writing you to express my concern with proposed changes to Sick Leave and Statutory Holiday Pay. I am aware that you are considering many different sources, but I am specifically concerned with what is outlined in the B.C. Law Institute's Employment Standards Act Reform Project.

Businesses like those in our region have been facing mounting costs over the past two years. Increases in the minimum wage, the new Employer Health Tax, and other business costs are stunting growth and reducing businesses' capacity to investment in our local community. Further costs to business resulting from gratuitous sick leave and statutory holiday pay laws would only serve to reinforce these negative trends.

The BCLI Employment Standards Act Reform Project Committee has outlined several options to reform sick leave. They range from keeping the existing system of 5 unpaid leave days, to a substantial change of 10 paid sick leave days. The cost associated with the latter option is extremely worrying to employers like those in our region. This would not only go well beyond the standard across Canadian jurisdictions but could also discourage employers from hiring additional workers and instead opt for contract arrangements. To that end, we firmly support the current sick leave policy and ask that it remain unchanged or similar to its current incarnation.

I also want to express my opposition to a recommendation by the Committee to relax the eligibility requirements for statutory holiday pay. The new law would only require employees to work or earn wages on 16 of the 60 days preceding a statutory holiday to be eligible for statutory holiday pay, as opposed to 15 of 30 days preceding statutory holidays that is in place currently.



Statutory holidays and paid sick leave are expensive for employers. To improve B.C.'s investment and business climate, a proper balance between promoting employee welfare and reducing business costs is crucial. When businesses do not thrive and are faced with cutting labour costs, the employees are the first to feel it. I urge you to consider the above input so that businesses in B.C. can continue to drive our economy forward with strength.

Sincerely,

A handwritten signature in black ink, appearing to read 'PT', with a long, sweeping underline.

Peter Bourke

Executive Director – Columbia Valley Chamber of Commerce