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November 7, 2017

The Hon. Kathleen Wynne  
Premier of Ontario  
Queen's Park  
Toronto, Ontario

Dear Premier Wynne:

At the meeting of SPNO's local social planning council membership from across the province last week, we discussed *Bill 148, The Fair Wages, Better Workplaces Act* now entering the final stages of the legislative process. We know that you and your Cabinet are giving final consideration this week to this legislation including proposed amendment coming out of Committee.

First of all, our membership wishes to commend you and your Government for holding fast to your commitment to raising the minimum wage in a two-stage process to \$15 an hour in 2019. We know that you have weathered a lot of resistance from some parts of the business community on this matter. This new minimum wage standard will not only have a major impact on poverty reduction but will also contribute to the growth of local economies across the province. Your resolve on this critically important measure is greatly appreciated.

Employment standards and working conditions are as important as fair wages. *Bill 148* begins to recognize this with provisions for the protection of Ontarians who are precariously employed, such as paid leave for illness and emergency, although the number of annual paid leave days should be extended from two to at least seven.

There are several critically important proposed amendments that our membership urges you *not* to incorporate in the final version of *Bill 148* that will go to the Legislature for the final vote. First, in its previous submissions to the Standing Committee on Finance and Economic Affairs (July 20), SPNO expressed its support for equal pay for work of equal value for part-time and temporary employees doing comparable work to full-time permanent employees. The proposal to base seniority on "hours of work accumulated" versus the commonly recognized practice of "date of hire", places a severe disadvantage for workers in nonstandard employment in terms of achieving wage equality with permanent employees doing the same work. This amendment undermines the intent of your original equal pay provision and we urge you to revoke this change.

Secondly, on-call employees require more stability and predictability in their work schedules. Bill 148 introduced some provisions to help in this regard. However, exceptions for certain vaguely defined conditions (“emergencies”) and exemptions for certain employers which is opened up for expansion, again would undercut the intent to protect especially temporary workers. We urge you to reject these provisions as well.

There are additional concerns we have such as assurance of allocating the resources necessary for enforcement of the new employment standards and providing better access to union protection for certain classes of workers. The SPNO supports these and other proposals in the latest submission of the Workers’ Action Centre to the Standing Committee on Finance and Economic Affairs on October 30, 2017.

Finally, while not for immediate action as your Government prepares to bring the final version of Bill 148 before the Legislature, we have requested previously that some consideration be given to the problem of nonstandard employment in the non-profit sector. Legislation on fair workplaces and better jobs will positively affect the working conditions in the nonprofit community services sector. However, the role of Government as funder and regulator of the sector creates a unique and different situation that demands changes in Government practice to allow for the creation of fair and decent jobs in the sector. In terms of a non-legislative commitment, SPNO has recommended previously in its submissions on the ESA that the Minister of Labour convene and join a table of representatives from the nonprofit community services sector and the funding sector to support and promote decent employment in community services with a special focus on a human resource development strategy to help the sector attract younger workers wishing to join their career paths with the social missions of community services organizations. This request was made again most recently in a letter (October 27, 2017) to the Minister of Labour from one of our members, Community Development Halton, on behalf of all of our 19 members organizations across the province.

We hope that our preceding suggestions on the final form of Bill 148 may receive favourable consideration in the final deliberations with your colleagues this week and look forward to the passage of major legislative reform on fair wages and employment standards in the coming weeks.

Sincerely,



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