



December 8, 2014

The Hon. Jason Kenney  
Minister of Employment and Social Development  
140 Promenade du Portage  
Gatineau, Quebec K1A 0J9

The Hon. Chris Alexander  
Minister of Citizenship and Immigration  
365 Laurier Avenue West  
Ottawa, Ontario K1A 1L1

Dear Ministers,

We write to share our common concerns and those of many of our respective members regarding the changes to the Temporary Foreign Worker Program (TFWP)– particularly with regard to entry-level workers – and the systemic shortage of labour problem in many regions and sectors of the economy. While our organizations represent a wide range of Canadian businesses in terms of size and sector, we are all significant employers and job creators for entry-level employees and those with more junior skill sets. Many of our members with the most acute staffing shortages are located in rural or remote parts of Canada – often in areas with many resource-based companies with large wage and benefits packages.

Firstly, there has been some alleged misuse of the program over recent years, and the coalition agrees that corrective action should be taken when such misuse is proven to be true.

Nevertheless, the TFWP has been crucially important for businesses in certain regions and sectors of the country. Our country has a very well educated workforce with one of the highest levels of post-secondary education attainment in the world. But the country is also strengthened by having a large number of employers in occupations that require different sets of skills – often those not learned at school. While these employers still employ a massive number of Canadians, many are finding the pool of available workers to be shrinking quickly.

While imperfect, the TFWP has provided some crucial relief to the labour market shortages many of these firms have experienced. We know that some may feel employers are using the TFWP as a preference, but we assure you that our members are using the program due to a lack of other options. No firm would go through the expense, paperwork and delays associated with the TFWP if there was a reliable, locally available alternative to fill the position.

Our members have been steadily increasing wages and we wish to challenge many of the thin studies that have been cited to suggest otherwise. Several of the associations listed above will soon provide you with evidence of inaccurate data used by government in public settings.

While the permanent immigration system – and the new Express Entry system – may work well for employers of more senior-level skills, the system brings in very few for employers of more junior skill sets.

The coalition's ultimate goal is to take short, medium and long term steps to address labour shortages, particularly for employers of entry-level workers. While each member of the coalition has a number of specific short and long-term recommendations, we ask for your support in considering the following changes to help support and build a labour force focused on the needs of all Canadian employers:

1. Work with employer organizations on a national study of labour market needs in lower skilled occupational categories, with a special emphasis on rural and remote parts of Canada, and regions with overheated markets (e.g. Alberta).
2. To better understand and address skills, availability and inter-provincial mobility issues, conduct a comprehensive survey of unemployed Canadians on their willingness to consider various sectors, hours and regions. Survey the unemployed on employment and mobility restrictions to address skills/availability mismatch.
3. Give all employers – including employers of lower-skilled occupations – access to the new Express Entry system for permanent immigration.

With regard to the TWFP in particular, we recommend the following:

1. Strongly enforce all agreements by employers with tough measures for any employer found abusing the program.
2. Eliminate any discriminatory policies against employers in lower-skilled occupational categories, including recent measures against the restaurant, hotel and retail sectors.
3. Consider maintaining the 30% cap of TFW hours per worksite indefinitely and consider modifying the 6% regional unemployment rule where demonstrated needs exist. Increase the minimum TFW work permit to two years.
4. Ensure all skill levels of TFWs have access to a national pathway to permanent residence. Ensure TFWs in Canada with applications in process for permanent residency are allowed to remain until processing is complete.
5. Create an Employer Code of Conduct for the TFW Program that employers would be required to meet.

These recommendations will help create a pool of workers for employers to access while preventing abuse of the program and of foreign workers. The members of the coalition pledge to work with the government in developing a workable and fair solution for all sides.

We would like to request a meeting to discuss the above recommendations and how to best proceed, and will contact your offices in the coming days to arrange a suitable date and time. Thank you in advance for your consideration of this request.

Sincerely,



Dan Kelly  
President and CEO  
Canadian Federation of Independent Business



Donna Doohar  
Interim President and CEO  
Restaurants Canada



Diane J. Brisebois  
President & CEO  
Retail Council of Canada



Rob Taylor  
President and CEO (interim)  
Tourism Industry Association of Canada

c.c.: All Members of Parliament