

COPA

Changing Workplace Review, ELCPB
400 University Ave., 12th Floor
Toronto, Ontario M7A 1T7
CWR.SpecialAdvisors@ontario.ca

Via Mail and Email

September 21, 2016

Re: The Changing Workplaces Review – Interim Report
Attn: Special Advisors

Dear Sirs:

The Canadian Office Products Association ("COPA") is a national trade association and the official voice representing our members in the office products sector across Canada. We provide advice and assistance to Federal and Provincial ministries concerning the office products sector. The association was incorporated in the Province of Ontario and is governed by a volunteer Board of Directors. Our national office is located in Toronto, Ontario.

COPA has been a proud membership community for the nation's resellers and manufacturers of office products for over 80 years. Today, along with providing discount programs and delivering the industry's largest conference and networking events, COPA is heavily involved in developing research and training initiatives. Through these initiatives, COPA is able to supply the type of information members require to strategically position themselves within an ever-fluctuating market.

We congratulate the Ministry of Labour for undertaking this much overdue and needed review of both the Ontario Labour Relations Act and the Ontario Employment Standards Act. Regrettably, we were not made aware of this review until recently and did not have the opportunity to provide you with any input for formulating your interim report and the presenting options for consideration.

As an industry and sector, it is becoming more and more difficult for our members to meet the challenges of the competitive marketplace. Our labour market in the early 90's has changed significantly over the past twenty plus years. Referring back to the law as in 1993 – 1995 is not being progressive. We believe a formal and broader consultative with various employer associations would be beneficial to the process. We would appreciate an opportunity to meet with you and discuss in greater detail our concerns with some of the options you are proposing. The nature of our work includes businesses that sell products for the office to the end consumer (known as dealers), as well as firms that manufacture and/or distribute those products (known as suppliers and wholesalers). COPA also includes companies classed as manufacturers' sales agents. We require a market place that balances employer, employee, and customer responsibilities and obligations.

We have reviewed the number of options outlined in the "Interim Report". We believe that further consultation and engagement with employer organizations would be of great value to you. We believe that there are a number of proposed options for change that will have significant implications for our industry and for our membership.

Specific Proposed Changes of Concern

Provisions described within the Ontario Employment Standards Act:

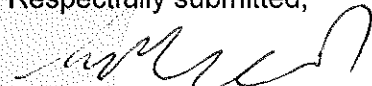
1. Definition of an Employee
2. Definition of an Employer
3. Exemptions, Special Rules and General Process as it specifically relates to "managers and supervisors" and the "student exemption from the three hour rule"
4. Leaves of Absence
5. Enforcement and Administration
6. Use of "Binding" Settlements
7. Remedies and Penalties
8. Increase powers of the Office of the Worker Advisor

Provisions described within the Ontario Labour Relations Act:

1. Related and Joint Employers
2. Card Based Certification
3. Off site, Telephone and Internet Voting
4. Successor Rights
5. Replacement Workers

We would appreciate the opportunity to meet with you and discuss specifically these concerns and alternative options that would be more appropriate for the office products sector. Please contact **Sam Moncada** at **905-624-9462 ext. 228** or **smoncada@copa.ca** to set up some time to meet.

Respectfully submitted,



Sam Moncada
President, COPA