



**Canadian Vehicle
Manufacturers' Association**
Association canadienne
des constructeurs de véhicules

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October 14, 2016

Hon. John C. Murray, Co-Chair
Changing Workplaces Review
Employment, Labour and Corporate
Policy Branch
Ontario Ministry of Labour
400 University Avenue, 12th Floor
Toronto, ON M7A 1T7

C. Michael Mitchell, Co-Chair
Changing Workplaces Review
Employment, Labour and Corporate
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Ontario Ministry of Labour
400 University Avenue, 12th Floor
Toronto, ON M7A 1T7

Re: Ministry of Labour – Changing Workplaces Review – Special Advisor’s Interim Report

Dear Sirs:

The Canadian Vehicle Manufacturers’ Association (CVMA), representing FCA Canada Inc., Ford Motor Company of Canada, Limited, and General Motors of Canada Company, appreciates that stakeholders are being asked to comment on the Interim Report. The CVMA members appreciate the opportunity to provide comments on the issues and options contained in the Interim Report and the potential impact on the automotive industry in Ontario.

From our review of the Interim Report, CVMA has noted a number of issues under the Labour Relations Act (LRA) and Employment Standards Act (ESA) where we wish to provide input from a large advanced manufacturing employer perspective. These issues of interest, as identified in the Interim Report, include, but are not limited to temporary help agencies, franchisees and franchisor, expansion of the successor provisions, administrative penalties, misclassification of employees, exemptions, employer and scope of liability, and employee leaves including paid sick leaves and doctors notes.

We expect to have our submission to you shortly to outline these concerns and provide our perspectives in more detail.

CVMA trusts that our submission will be taken into consideration in the review of the comments.

Yours sincerely,

Mark A. Nantais
President

cc: S. Dennis, Ministry of Labour
M. Crouse, Ministry of Labour

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