



“Connecting our Community to the Work of Building a Healthy Food System”

Changing Workplaces Review
Employment Labour and Corporate Policy Branch
Ministry of Labour
400 University Ave., 12th Floor
Toronto, ON M7A 1T7

Re: Changing Workplaces Review

September 18, 2015

To Mr. C. Michael Mitchell and the Honourable John C. Murray,

Thank you for inviting the public to provide input for the Changing Workplaces Review. Please consider these comments from the Waterloo Region Food System Roundtable in your process.

The Roundtable consists of 22 members representing diverse sectors of the local food system, including farmers, food distributors, food retailers, restaurants, food service managers, university researchers, consumers, food banks, and health professionals. Our goal is to help create a healthy food system in Waterloo Region, in which “all residents have access to, and can afford to buy, safe, nutritious, and culturally-acceptable food”. We advocate for the right to food and for policies and programs that address food insecurity. In Waterloo Region, 13 percent of all residents, or 61,000 people, experience food insecurity, according to a 2015 report by Cancer Care Ontario. While this is a complex issue, research shows that in most cases food insecurity is an outcome of low income. Therefore, supporting decent jobs with decent pay is a key way to promote food security.

Our recommendations focus on the Employment Standards Act (2000), and our conversations were informed by the document *Still Working on the Edge* released by the Workers Action Centre in March 2015. We have taken into account the perspectives of our members, including workers and employers in the agriculture and food sector, to come up with these recommendations.

All of us support the need to find ways to address the number of people in precarious working situations, and we want to see increased employment standards by enforcing existing regulations and addressing gaps in the ESA which enable in precarious working conditions. On the other hand, we recognize the concerns of farmers and business owners who fear additional regulations which can be unnecessarily costly and time-consuming for honest employers. We all would like to see companies who choose to abuse the system forced to comply with the ESA. We would also like to close loopholes which allow employers to take advantage of employees. However, all of this this needs to be done in a way which does not inadvertently punish compliant companies or unnecessarily burden small businesses.

Current gaps leave the ESA open to misinterpretation and abuse, resulting in exclusion of workers from ESA protection, especially those in non-standard employment relationships. This shifts risks and costs onto workers and creates inequalities through misclassification and exemptions. We want to see these

gaps addressed to reduce abuses and increase fairness in the workplace. For example, the definition of employee should be expanded to ensure all workers - including those non-standard work relationships - are protected by the basic minimum standards of the ESA. We also like the idea that part-time, temporary, casual, and contract workers should receive the same wages, pro-rated benefits, and working conditions as full-time workers who do the same job.

On behalf of the Waterloo Region Food System Roundtable, we hope that you will consider our comments for the Changing Workplaces Review. We believe in an Ontario with fair workplaces where working enables people to get out of poverty. We believe improvements in employment standards will promote decent work in Ontario and help alleviate food insecurity.

Sincerely,

A handwritten signature in blue ink that reads "P. Bryk". The signature is fluid and cursive.

Paula Bryk, co-chair

A handwritten signature in black ink that reads "Joel Knight". The signature is bold and stylized.

Joel Knight, co-chair