



January 27, 2023

Minister Trevor Holder
Chestnut Complex
P. O. Box 6000
Fredericton, NB
E3B 5H1
Via email: trevor.holder@gnb.ca

Dear Minister Holder,

RE: Bill 27 re: Amending the Employment Standards Act

On behalf of the Saint John Region Chamber of Commerce, our fellow chambers, The Coalition of New Brunswick Employers, and their member associations from across New Brunswick, we are writing to you to voice concern as the proposed 10 paid sick day amendments, up from 5 unpaid sick days currently, will have significant negative consequences on employers in New Brunswick and on the provincial economy as a whole.

Along with various business, trade and industry associations in New Brunswick we represent nearly 300,000 hard working employees in the province.

As New Brunswick moves on from the COVID-19 pandemic, our provincial economy is looking to take advantage of a growing global economy and trade. However, unlike other provinces in Canada, we are facing persistent and unique obstacles. Our provincial growth is limited by ongoing supply chain disruptions plus labour and skills shortages. Coupled with these challenges is rising inflation, threats of economic recession, and global instability. While many of these global challenges affect all Canadian provinces, New Brunswick has unique problems that must be addressed. Employers in New Brunswick are facing a difficult cost environment for the foreseeable future. Inflationary pressure, a significant minimum wage increase in 2022, CPI increases, EI expansion, plus increasing carbon taxes and property taxes add to a costly and uncompetitive business landscape.

Given all of the stress that New Brunswick employers currently encounter, Bill 27 to amend The Employment Standards Act does not take into account the high cost of doing business in New Brunswick. Employers clearly need to keep costs low to remain competitive and as such believe that the market should decide the outcome of sick day requirements. Furthermore, to put this additional cost on employers now would threaten the economic growth that the province has seen recently.

As you are aware, only two other Canadian provinces have legislated paid sick leave – British Columbia with five days and Prince Edward Island with one day. Our province needs to maintain competitiveness with other jurisdictions including provinces, not only for our current employers but also for the government's own planned investment attraction. The days of New Brunswick's having a low-cost

jurisdiction overall is in the past ... the increased cost associated with paid sick days would add to increased competitive pressure.

We would be happy to discuss this further with you, either as a group or with specific members, as we bring a unique perspective on this subject. The potential impact on employers throughout New Brunswick is too great to implement this drastic change without proper consultation. As you are so very aware, it is the private sector that is responsible for economic growth in the province and this amendment will set our province back, clearly in the opposite direction of creating jobs and increasing the wealth of the province.

We ask that the government not pass Bill 27.

Submitted by:

Saint John Region Chamber of Commerce

Fredericton Chamber of Commerce

Moncton Chamber of Commerce

Members of the Coalition of NB Employers