



**CANADIAN FEDERATION
OF INDEPENDENT BUSINESS.**

2400 College Avenue, Suite 101
Regina, Saskatchewan S4P 1C8

May 1, 2009

Ms. Wynne Young, Deputy Minister
Advanced Education, Employment and Labour
11th Floor, 1945 Hamilton Street
Regina, Saskatchewan
S4P 2C8

Dear Ms. Young:

On behalf of the Canadian Federation of Independent Business (CFIB) and our 5,250 members in Saskatchewan, I welcome the opportunity to share the views of Saskatchewan small business owners on the important issues of minimum age of employment, and when it is appropriate for a young person to enter the workforce.

As you may know, CFIB is a not-for-profit, non-partisan political action organization funded solely by our 105,000 independent business owners across the country (5,250 members in Saskatchewan). Our membership represents a broad range of industry sectors including retail, hospitality, manufacturing, business services, construction, wholesale, agriculture, finance, transportation, and education. These members are regularly surveyed in order to determine their positions and priorities. In addition, a CFIB representative meets with each one of our members at least once a year, which provides another opportunity to collect information about the priorities and concerns of small- and medium-sized enterprises (SMEs).

Running a small business is not easy: owners take personal risks, often operate on small margins and work long hours. On average, the majority of Saskatchewan's small business owners work at least 50 hours per week, and many - a quarter - work over 60 hours per week. As well a staggering 98 per cent of small business owners contribute to charitable or community causes in one form or another.

In this submission CFIB will provide survey results of our members' views on the issue of minimum age. It is important to remember small business owners are fundamentally no different than residents when it comes to their commitment to their community and their priorities for the future. They are concerned about public safety, about their tax levels and saving for their future, and about having well-resourced and accessible public services for those who need them. They are not beholden to shareholders and stock markets, but to their community and their employees.

Saskatchewan small business owners welcome recent changes to lower minimum age of employment from 16 to 15 in five sectors

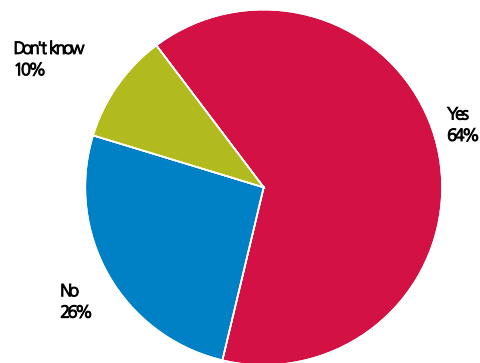
As you know, in Saskatchewan the Minimum Wage Regulations under the Labour Standards Act restrict the employment of young workers in the following five sectors – restaurants, hotels, hospitals, nursing homes, and educational institutions. CFIB welcomed the government’s recent decision to lower the minimum age of employment in these five sectors to age 15 from 16 and also agreed with the provision that the employed 15-year olds not work more than 16 hours per week. While we understand this change is a pilot project and will be reviewed in May 2009, CFIB would strongly recommend this change be made permanent.

CFIB recently surveyed its Saskatchewan members on a number of issues and when we asked our members should the minimum age of employment be set at age 15 for all workplaces in Saskatchewan, 64 per cent of respondents supported such a move, 26 per cent were opposed, and a further ten per cent said they did not know (see Figure 1).

In media commentary following the government’s decision on December 23, 2008, CFIB said: *“It’s going to be good news for business owners. It will also help them deal with labour shortages in those sectors. It is also good news for young people as it will provide them with valuable work experience and also an opportunity to earn some extra spending money.”*

Figure 1:

Should the minimum age of employment be set at age 15 for all workplaces in Saskatchewan?



Source: CFIB Pre-Budget Survey, January 2009

Majority of Saskatchewan small business owners support an absolute minimum age of employment with certain restrictions

When the Ministry of Advanced Education, Employment and Labour launched consultations on the issue of an absolute minimum age of employment on January 23, 2009, CFIB publicly welcomed the consultation and said: *“This is a discussion we do need to have. If in fact we are going to have a minimum age of employment, what should that be and what parameters should be around that.”*

CFIB agrees with the provincial government that the highest priorities, when reviewing the minimum age of employment, must be the health and safety, education and overall well-being of Saskatchewan young people.

There are those that oppose such changes and point to the need to ensure the safety of youth, as well as ensure education remains the main focus for those of school age. While CFIB agrees work

safety and a focus on education is extremely important, we believe it is also important to provide young people with opportunities to gain valuable work experience.

It is our understanding that an absolute minimum age of employment exists in other jurisdictions under specific conditions: Alberta – 12 years of age; Manitoba – 12 years of age except in special circumstances; British Columbia – 12 years of age except with Director’s permission.

Currently in Saskatchewan there is no legal requirement for young people to obtain parental consent prior to seeking employment. Parental consent is required in British Columbia and Alberta for young people under the age of 15 to work.

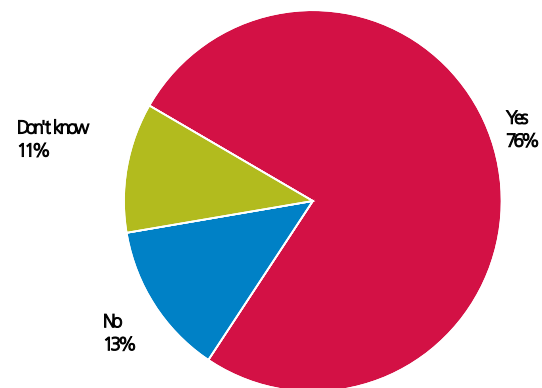
The examples of restrictions outlined in the discussion paper provided by the Ministry of Advanced Education, Employment and Labour included: parental consent, mandatory work readiness training, maximum hours of work on a school day, maximum hours of work during a school week and supervision requirements.

CFIB’s recent survey also asked a question regarding youth between ages 12 and 14 being allowed to work. The results revealed the majority of Saskatchewan respondents (76 per cent) agreed youth between the ages of 12 and 14 who wish to work should be required to provide proof of parental permission and complete an employment readiness program prior to being eligible for employment. Only 13 per cent of Saskatchewan respondents disagreed, and 11 per cent did not know (see Figure 2).

Given these results, CFIB believes changes are required to help address the continued labour shortages experienced by Saskatchewan employers across the province. Positive economic growth in Saskatchewan has brought new challenges, such as the growing concern over the shortage of qualified labour. In fact, the number of members identifying labour shortages as a concern has increased 53 per cent in the last six years, from 43 per cent in 2002 to 66 per cent today. Our demographics suggest the shortage of qualified labour is a problem that is not going to go away anytime soon.

Figure 2:

Should youth between the ages of 12 and 14 who wish to work be required to provide proof of parental permission and complete an employment readiness program prior to being eligible for employment?




Source: CFIB Pre-Budget Survey, January 2009

The long-term vacancy rate among Canada's small businesses also continues to grow with Saskatchewan reporting the highest rate in 2007, taking the lead from Alberta. CFIB estimates 18,000 of these unfilled positions in small- and medium-sized firms were in Saskatchewan. By sector, the hospitality sector had the second highest long-term vacancy rate in Saskatchewan.

CFIB believes that any amendments made should not be overly bureaucratic and should balance the need for students to attain the highest level of education possible while garnering valuable work experience that does not interfere with the successful completion of their studies.

Thank you for the opportunity to share our members' views on this important issue. We trust you will seriously consider CFIB's recommendation and make the necessary changes. Please do not hesitate to call our office at (306) 757-0000 if you, or your staff, have any questions.

Sincerely,



Marilyn Braun-Pollon
Vice-President, Saskatchewan and Agri-Business

- cc. The Hon. Brad Wall, Premier of Saskatchewan
Hon. Rob Norris, Minister of Advanced Education, Employment and Labour
Hon. Lyle Stewart, Minister of Enterprise and Innovation
Mr. Dale Botting, Deputy Minister, Enterprise and Innovation
Mr. Mike Carr, Associate Deputy Minister, Advanced Education, Employment and Labour