



Honourable Harry Bains, Minister of Labour  
P.O Box 9064 Stn Prov Govt  
Victoria BC V8W0E2

March 31, 2019

*Via email: ESARreview@gov.bc.ca*

Re: Response to Employment Standards Act - Consultation Paper

Dear Minister Bains,

I am writing in response to your Ministry's call for submissions to the Employment Standards Act - Consultation Paper.

Specifically, we are responding to Theme 1 – Increasing protection of child workers:

*For Input: What is your view on increasing protections for child workers? Should government categorize some work as hazardous/unsuitable for children?*

First Call: BC Child and Youth Advocacy Coalition has been calling for improvements to the Employment Standards Act to better protect children and youth for over fifteen years.

Our research has led us to recommend modernizing the legislative and regulatory framework to raise the general work start age to 16, prohibit tasks that are leading to injuries, and prohibit those under eighteen from working on potentially hazardous work sites. Data about worksites and tasks commonly associated with injuries are well documented by WorkSafeBC.

BC has the lowest child-related employment standards in North America and is the only province that has virtually no restrictions on the occupations, tasks, or time of day a child can work.

We can see from years of injury data provided by WorkSafeBC that kids as young as 12 are getting injured on the job. They're getting injured working in construction, manufacturing, resources and in the service sector.

One study we carried out with adolescents found 9% of participants said their first jobs were in construction – this is a sector that is prohibited to those under 16-years in all other provinces. In the same study, 43% of the youth we spoke to reported sustaining workplace injuries.

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Every single year over the past ten years children too many children under 14-years were injured on the job. Over a ten-year period Worksafe BC paid over five million dollars in disability benefits to over 800 individuals and health care claims to 2,000 more.

We need a gradual, safety-focused approach to work entry that protects the health and wellbeing of children and youth and supports them to focus on education.

We know the majority of British Columbians agree. A public opinion survey we conducted last spring indicated the majority supported a work start age of 16 – an age consistent with Canada’s 2016 commitment made when the Prime Minister ratified the International Labour Organization’s Convention 138.

We ask you to champion changes consistent with international standards and bring in new legislation this spring.

I attach the open letter we submitted to your office in February signed by my colleague Adrienne Montani, First Call’s Provincial Coordinator, and over twenty organizations representing thousands of members and supporters.

Since we submitted that letter to your office, a number of other groups signed on including:

- CCEC Credit Union
- Citizens for Accessible Neighbourhoods
- Parents Advocacy Network for Public Education
- BC Poverty Reduction Coalition
- New Westminster and District Labour Council
- Richmond Poverty Response Committee
- The Centre for Israel and Jewish Affairs – Pacific Region
- Vancouver and District Labour Council

It’s time to modernize provincial employment standards and recognize the vulnerabilities of children and adolescents. Twelve is too young to work at jobs meant for adults.



Helesia Luke  
Communications and Development Coordinator

Email attachments:

- First Call and Partners Open Letter to Minister Bains (submitted February 8, 2019)
- First Call Child Employment Standards Policy Recommendations (submitted August 31, 2018)
- Public Opinion Survey Commissioned by First Call: Mustel Group Survey Report (June 2018)
- First Call’s Freedom of Information Request: WorkSafeBC Data Tables on Under 15 Accepted Injury Claims (April 2018)

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