



**Mennonite New Life Centre**  
1774 Queen St E  
Toronto ON  
M4L 1G7

To: Tonia Grannum, Clerk  
Fax: 416-325-3505

December 2, 2009

**RE: Proposed Amendments to Bill 210**

Dear Committee Members,

The Mennonite New Life Centre wishes to support the detailed written submission on Bill 210 made by the Caregivers' Action Centre, the Workers' Action Centre and Parkdale Community Legal Services.

As a settlement agency serving newcomers of diverse backgrounds and immigration statuses, we are deeply concerned about the heightened vulnerability of temporary workers, whether they be live-in caregivers, seasonal agricultural workers, foreign temporary workers or resident workers employed through temp agencies. With the exponential growth in the temporary foreign worker population, it is not uncommon to hear stories of temporary foreign workers who pay exorbitant recruitment fees only to find out upon arrival that the promised job in Canada does not exist, or that the hours and work conditions were grossly misrepresented.

Bill 210 offers some welcome protections for live-in caregivers, prohibiting recruiters and employers from charging recruitment and related fees or withholding personal documents, and extending the time limit for workers to file a complaint. **We believe that these same protections should be extended to seasonal agricultural workers and temporary foreign workers, who face similar vulnerabilities to live-in caregivers because their immigration status is tied to their employer, as well as to resident workers.**

The vulnerability of temporary workers makes it critical to take a comprehensive approach to enforcement. The international scope of temporary worker recruitment creates many opportunities for employers to offload responsibility to a third party overseas. Furthermore, temporary workers are often hesitant to file a complaint because they fear reprisals, loss of income and employment and are apprehensive of how it may affect their immigration status now or in the future. For this reason, we support the following two recommendations from the joint submission made by the Caregivers' Action Centre, the Workers' Action Centre and Parkdale Community Legal Services:

- 1) Employers and recruitment agencies must be jointly liable for any prohibited direct or indirect fee charged to workers regardless of where and how the fee was levied.
- 2) Extend Bill 210's three and a half year time limit on complaints about contraventions of the Act to include complaints respecting unpaid wages and *ESA* entitlements.

Ultimately, while we recognize this is outside the scope of the current bill and provincial jurisdiction, we would like to see new channels for temporary foreign workers to apply for permanent residence status, reducing their vulnerability to exploitation and abuse by employers. I urge you to address this concern with your federal counterparts.

On behalf of the Mennonite New Life Centre, I thank you for your attention to this critical issue, and urge you to continue to expand protections for temporary foreign workers.

Sincerely,

Tanya Chute Molina  
Executive Director