



HOUSE OF COMMONS
CHAMBRE DES COMMUNES
CANADA

WORKERS IN THE SEASONAL INDUSTRY AND THE EMPLOYMENT INSURANCE PROGRAM

**Report of the Standing Committee on Human Resources,
Skills and Social Development and the Status of Persons
with Disabilities**

Robert Morrissey, Chair

**MARCH 2026
45th PARLIAMENT, 1st SESSION**

Published under the authority of the Speaker of the House of Commons

SPEAKER'S PERMISSION

The proceedings of the House of Commons and its Committees are hereby made available to provide greater public access. The parliamentary privilege of the House of Commons to control the publication and broadcast of the proceedings of the House of Commons and its Committees is nonetheless reserved. All copyrights therein are also reserved.

Reproduction of the proceedings of the House of Commons and its Committees, in whole or in part and in any medium, is hereby permitted provided that the reproduction is accurate and is not presented as official. This permission does not extend to reproduction, distribution or use for commercial purpose of financial gain. Reproduction or use outside this permission or without authorization may be treated as copyright infringement in accordance with the *Copyright Act*. Authorization may be obtained on written application to the Office of the Speaker of the House of Commons.

Reproduction in accordance with this permission does not constitute publication under the authority of the House of Commons. The absolute privilege that applies to the proceedings of the House of Commons does not extend to these permitted reproductions. Where a reproduction includes briefs to a Standing Committee of the House of Commons, authorization for reproduction may be required from the authors in accordance with the *Copyright Act*.

Nothing in this permission abrogates or derogates from the privileges, powers, immunities and rights of the House of Commons and its Committees. For greater certainty, this permission does not affect the prohibition against impeaching or questioning the proceedings of the House of Commons in courts or otherwise. The House of Commons retains the right and privilege to find users in contempt of Parliament if a reproduction or use is not in accordance with this permission.

Also available on the House of Commons website
at the following address: www.ourcommons.ca

**WORKERS IN THE SEASONAL INDUSTRY AND
THE EMPLOYMENT INSURANCE PROGRAM**

**Report of the Standing Committee on
Human Resources, Skills and Social
Development and the Status of Persons with
Disabilities**

**Robert Morrissey
Chair**

MARCH 2026

45th PARLIAMENT, 1st SESSION

NOTICE TO READER

Reports from committees presented to the House of Commons

Presenting a report to the House is the way a committee makes public its findings and recommendations on a particular topic. Substantive reports on a subject-matter study usually contain a synopsis of the testimony heard, the recommendations made by the committee, as well as the reasons for those recommendations.

STANDING COMMITTEE ON HUMAN RESOURCES, SKILLS AND SOCIAL DEVELOPMENT AND THE STATUS OF PERSONS WITH DISABILITIES

CHAIR

Robert Morrissey

VICE-CHAIRS

Rosemarie Falk

Andréanne Larouche

MEMBERS

Caroline Desrochers

Jessica Fancy

Garnett Genuis

Laila Goodridge

Natilien Joseph

Annie Koutrakis

Colin Reynolds

OTHER MEMBERS OF PARLIAMENT WHO PARTICIPATED

Scott Aitchison

David Bexte

Marianne Dandurand

Marie-Hélène Gaudreau

Marilène Gill

Michael Guglielmin

Vincent Neil Ho

Robert Oliphant

Arnold Viersen

CLERK OF THE COMMITTEE

Alexandre Longpré

LIBRARY OF PARLIAMENT

Research and Education

Eleni Kachulis, Analyst

Vanessa Preston, Analyst

STANDING COMMITTEE ON HUMAN RESOURCES, SKILLS AND SOCIAL DEVELOPMENT AND THE STATUS OF PERSONS WITH DISABILITIES

44th PARLIAMENT – 1st SESSION

CHAIR

Robert Morrissey

VICE-CHAIRS

Tracy Gray

Louise Chabot

MEMBERS

Scott Aitchison

Chad Collins

Michael Coteau

Rosemarie Falk

Peter Fragiskatos

Wayne Long

Kyle Seeback

Tony Van Bynen

Bonita Zarrillo

OTHER MEMBERS OF PARLIAMENT WHO PARTICIPATED

Yvan Baker

Serge Cormier

Michelle Ferreri

Peter Fonseca

Irek Kusmierczyk

Philip Lawrence

Marco Mendicino

Clifford Small

Tako Van Popta

Dominique Vien

Kevin Waugh

CLERK OF THE COMMITTEE

Ariane Calvert

LIBRARY OF PARLIAMENT

Research and Education

Antoine Dedewanou, Analyst

Eleni Kachulis, Analyst

Vanessa Preston, Analyst

THE STANDING COMMITTEE ON HUMAN RESOURCES, SKILLS AND SOCIAL DEVELOPMENT AND THE STATUS OF PERSONS WITH DISABILITIES

has the honour to present its

SIXTH REPORT

Pursuant to its mandate under Standing Order 108(2), the committee has studied workers in the seasonal industry and the Employment Insurance program and has agreed to report the following:

TABLE OF CONTENTS

SUMMARY	1
LIST OF RECOMMENDATIONS	3
WORKERS IN THE SEASONAL INDUSTRY AND THE EMPLOYMENT INSURANCE PROGRAM	5
Introduction	5
Background Information	6
About the Employment Insurance Program	6
Seasonal Industries and the Role of Employment Insurance	7
Access to Employment Insurance for Workers in Seasonal Industries	9
Variable Entrance Requirement	9
Hours of Insurable Employment	11
Employment Insurance Economic Regions	12
Access to Employment Insurance for Temporary Foreign Workers	13
Employment Insurance Benefits and Workers in Seasonal Industries	14
Best Weeks	14
Benefit Rate	16
Duration of Benefits	16
The Employment Insurance “Black Hole”	16
Maximum Weeks of Benefits	18
Temporary Employment Insurance Measure for Seasonal Claimants	18
Facilitating Off-Season Work	21
Other Considerations	24
Premium Rates	24
Training	25
Comprehensive Reform	26
Conclusion	26

APPENDIX A: LIST OF WITNESSES	27
APPENDIX B: LIST OF BRIEFS	29
REQUEST FOR GOVERNMENT RESPONSE	31
DISSENTING OPINION OF THE CONSERVATIVE PARTY OF CANADA	33

SUMMARY

Seasonal industries are an important part of Canada's economy and can be critical to the vitality of the regions where they operate. However, the off-season can bring about financial difficulties for workers in these industries. The Employment Insurance (EI) program is a key federal mechanism supporting workers who face a period of unemployment during their industry's off-season, particularly in regions with highly seasonal economies.

Over the course of five meetings, the House of Commons Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities heard from industry and worker representatives about the situation of workers in seasonal industries, and ways the EI program could be changed to better meet their needs.

Through oral and written testimony, witnesses told the committee about the importance of the EI program to seasonal industries and the regions where they operate, and the challenges workers in seasonal industries face in relation to EI. In this report, the committee summarizes key testimony and makes recommendations to the federal government on changes to the EI program aiming to improve its accessibility and adequacy for workers in seasonal industries, as well as better encourage employment during the off-season.

LIST OF RECOMMENDATIONS

As a result of their deliberations committees may make recommendations which they include in their reports for the consideration of the House of Commons or the Government. Recommendations related to this study are listed below.

Recommendation 1

That Employment and Social Development Canada study the impact of lowering the insurable employment threshold for workers in seasonal industries to qualify for Employment Insurance regular benefits, regardless of regional unemployment rates; and that it report its findings to the committee within one year of this report’s adoption in the House of Commons. 12

Recommendation 2

That the Government of Canada consider implementing a standard divisor for workers in seasonal industries, regardless of the unemployment rate in their economic region. 16

Recommendation 3

That the Government of Canada amend the record of employment form to include an option to identify whether a worker has experienced a seasonal layoff. 21

Recommendation 4

That the Government of Canada permanently increase the number of weeks of Employment Insurance regular benefits available to workers in seasonal industries, aiming to solve the Employment Insurance “black hole” issue; and that, until this is implemented, the government continue to renew the temporary measure providing additional weeks of regular benefits to seasonal claimants in select regions. 21

Recommendation 5

That the Government of Canada take measures to encourage workers in seasonal industries to pursue employment during the off-season, such as allowing them to keep more of their earnings through the Working While on Claim program; and that the government review the Employment Insurance program requirements relating to valid job separation for workers in the seasonal industry, ensuring that these requirements do not unintentionally penalize workers who pursue employment during the off-season.

23

Recommendation 6

That the Government of Canada undertake, without delay, a comprehensive reform of the Employment Insurance system in order to adapt it to the current realities of the labour market, particularly those of regions and industries with a strong seasonal component, by reviewing eligibility criteria, the duration of benefits, and the method used to calculate benefits, with the objective of ensuring an adequate, predictable, and equitable income replacement that respects the dignity of workers.

26



WORKERS IN THE SEASONAL INDUSTRY AND THE EMPLOYMENT INSURANCE PROGRAM

INTRODUCTION

Seasonal industries are an important part of Canada's economy and can be critical to the vitality of the regions where they operate. The Employment Insurance (EI) program is a key federal mechanism supporting workers who face a period of unemployment during their industry's off-season, particularly in regions with highly seasonal economies.

On 8 October 2024, the House of Commons Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities (HUMA or the committee) adopted the following motion:

That, pursuant to Standing Order 108(2), the Committee undertake a study of the situation of workers in the seasonal industry with regard to necessary improvements and changes to the employment insurance program to meet the needs of these workers, who often face job insecurity and financial difficulties for themselves and their families; that the Committee devote three meetings, including two to hear witnesses; that it invite the Minister of Employment, Workforce Development and Official Languages and public servants to answer the Committee's questions for one hour, as well as groups defending the rights of the unemployed and other relevant witnesses; and that the committee report its recommendations to the House.¹

Over the course of five meetings between 31 October and 3 December 2024, the committee heard from 13 witnesses in relation to this study, including industry and worker representatives. It also received eight written briefs. The study had not been completed when the 44th Parliament was dissolved.

On 16 September 2025, the committee adopted a motion to finalize the study:

That, pursuant to Standing Order 108(2), the Committee report its findings to the House on the study on workers in the seasonal industry and the employment insurance program that was undertaken during the

1 House of Commons Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities (HUMA), [Minutes](#), 8 October 2024.



1st Session of the 44th Parliament and that the evidence and documents gathered by the Committee be taken into consideration during the current session; that, pursuant to Standing Order 109, the Committee request that the government table a comprehensive response to the report.²

This report provides an overview of testimony received by the committee and makes recommendations to the Government of Canada on ways to increase the accessibility of EI benefits for workers in seasonal industries, improve the adequacy of EI benefits for these workers, and facilitate employment during the off-season. The committee thanks all those who participated in the study for their important contributions.

BACKGROUND INFORMATION

About the Employment Insurance Program

The EI program provides temporary income support in the event of a job loss (through regular benefits) or other life events, including the birth of a child, illness, a family member's risk of death, or a child or adult family member's critical illness (through special benefits).³ It also offers employment programs under the umbrella of Employment Benefits and Support Measures, as well as other supports for workplaces facing a temporary decrease in business activity beyond the control of the employer.

The program's parameters are primarily set out in the *Employment Insurance Act* (EIA),⁴ the *Employment Insurance Regulations* (EIR),⁵ the *Employment Insurance (Fishing) Regulations* (EIR (Fishing)),⁶ and the *Insurable Earnings and Collection of Premiums Regulations*.⁷

2 HUMA, [Minutes](#), 16 September 2025.

3 See, for example, Government of Canada, "[What these benefits offer](#)," *EI maternity and parental benefits*; "[What these benefits offer](#)," *EI sickness benefits*; and [EI caregiving benefits](#).

4 [Employment Insurance Act](#) (EIA), S.C. 1996, c. 23.

5 [Employment Insurance Regulations](#) (EIR), SOR/96-332.

6 [Employment Insurance \(Fishing\) Regulations](#) (EIR (Fishing)), SOR/96-445.

7 [Insurable Earnings and Collection of Premiums Regulations](#), SOR/97-33.

The Canada Employment Insurance Commission (CEIC) is responsible for overseeing the EI program, while Employment and Social Development Canada (ESDC) and Service Canada carry on the administration of the EI program on behalf of the Commission.⁸

Seasonal Industries and the Role of Employment Insurance

Line Sirois, Chief Executive Officer of Action-Chômage Côte-Nord, referred to seasonal industry as “an inherent aspect of the Canadian economy,” and a “characteristic feature” of certain sectors of the economy, such as forestry, agriculture and tourism.⁹ The committee also heard about the fishing industry in Atlantic Canada.¹⁰ Witnesses spoke to the situation of certain regions where economies are highly seasonal. For example, Line Sirois noted that workers in seasonal sectors make up approximately a quarter of the labour force on Quebec’s upper north shore.¹¹ Given this, some witnesses emphasized that it is regions or industries, not workers, that are seasonal in nature.¹²

The committee heard about the stabilizing role EI can play for highly seasonal economies,¹³ with Beth Potter, President and Chief Executive Officer of the Tourism Industry Association of Canada, stating, “EI allows individuals to bridge the gap between seasonal employment, providing financial stability and helping to keep local economies afloat.”¹⁴

The committee also learnt about the challenges faced by seasonal industries relating to financial pressures, environmental changes, and recruitment and retention. Philip Mondor, President and Chief Executive Officer of Tourism HR Canada, told the committee that cost-related challenges, such as inflationary pressures, are impacting small businesses’ ability

8 Government of Canada, [Canada Employment Insurance Commission \(CEIC\)](#).

9 HUMA, [Evidence](#), 31 October 2024, 1100 (Line Sirois, Chief Executive Officer, Action-Chômage Côte-Nord).

10 HUMA, [Brief](#), Fish, Food and Allied Workers Union – Unifor (FFAW-Unifor).

11 HUMA, [Evidence](#), 31 October 2024, 1100 (Sirois). See also, for example, HUMA, [Evidence](#), 19 November 2024, 1225 (Mandy Symonds, President, Southern Nova Scotia Seasonal Workers Alliance); HUMA, [Evidence](#), 3 December 2024, 1110 (Julie Brassard, Chief Executive Officer, Mouvement Action-Chômage de Charlevoix); HUMA, [Brief](#), Confédération des syndicats nationaux (CSN).

12 HUMA, [Evidence](#), 31 October 2024, 1100 (Sirois); HUMA, [Evidence](#), 31 October 2024, 1205 (Angella MacEwen, Senior Economist, National Services, Canadian Union of Public Employees).

13 HUMA, [Evidence](#), 31 October 2024, 1205 (MacEwen).

14 HUMA, [Evidence](#), 7 November 2024, 1105 (Beth Potter, President and Chief Executive Officer, Tourism Industry Association of Canada).



to hire staff.¹⁵ Beth Potter spoke to “the increased cost of doing business” including “everything from the supply chain to the additional taxes and fees [tourism operators are] required to pay at different levels of government.”¹⁶ The committee also heard about increasing costs for inputs such as fertilizer in the agriculture sector,¹⁷ and fuel and bait in the lobster industry.¹⁸

Witnesses spoke to how the increasing cost of living is impacting demand in their industries, with Paul Pinchbeck, President and Chief Executive Officer of the Canadian Ski Council, referring to “a fixed number of ski days... in everyone’s wallet”¹⁹ and Rhonda Tulk-Lane, Chief Executive Officer of the Atlantic Chamber of Commerce, telling the committee that limited disposable income is hindering people’s ability to travel within Atlantic Canada, noting: “It’s just too hard with the price of gas.”²⁰

In addition, the committee heard about the impact of climate change and extreme weather events on seasonal industries,²¹ and the importance of EI in mitigating the economic risks associated with these events. For example, the Tourism Industry Association of Canada noted in its brief that:

EI is an essential tool that helps mitigate the economic volatility experienced by many tourism workers. The seasonal nature of some tourism jobs, combined with unexpected disruptions like wildfires or economic downturns, means that those workers are particularly vulnerable.²²

15 HUMA, [Evidence](#), 26 November 2024, 1245 (Philip Mondor, President and Chief Executive Officer, Tourism HR Canada). See also HUMA, [Evidence](#), 31 October 2024, 1215, 1245 (Janet Krayden, Agricultural Workforce Expert, Canadian Mushroom Growers’ Association).

16 HUMA, [Evidence](#), 7 November 2024, 1150 (Potter).

17 HUMA, [Evidence](#), 31 October 2024, 1215 (Krayden).

18 HUMA, [Evidence](#), 19 November 2024, 1240 (Symonds).

19 HUMA, [Evidence](#), 31 October 2024, 1125 (Paul Pinchbeck, President and Chief Executive Officer, Canadian Ski Council).

20 HUMA, [Evidence](#), 19 November 2024, 1215 (Rhonda Tulk-Lane, Chief Executive Officer, Atlantic Chamber of Commerce).

21 See, for example, HUMA, [Evidence](#), 31 October 2024, 1140 (Fernand Thibodeau, Spokesperson, Seasonal Workers Help and Support); HUMA, [Evidence](#), 19 November 2024, 1230 (Symonds); HUMA, [Evidence](#), 26 November 2024, 1245 (Brodie Berrigan, Senior Director, Government Relations and Farm Policy, Canadian Federation of Agriculture).

22 HUMA, [Brief](#), Tourism Industry Association of Canada (TIAC). See also HUMA, [Evidence](#), 7 November 2024, 1105 (Potter).

Witnesses also spoke to how environmental changes and events, from shorter ski seasons to floods and wildfires, can impact workers' ability to obtain the hours of employment needed to qualify for EI.²³

Finally, witnesses discussed the challenges businesses face in recruiting and retaining workers in seasonal industries, the role EI plays in this, and potential consequences for local communities. Beth Potter and Julie Brassard, Chief Executive Officer of Mouvement Action-Chômage de Charlevoix, explained that workers' inability to qualify for EI to get through the off-season can result in them leaving the seasonal industry and potentially the region.²⁴ Line Sirois linked this challenge to population decline on Quebec's north shore.²⁵ Philip Mondor further elaborated:

In many cases, these tourism businesses are the economic and employment anchors of their community. Without them, the communities will see a further migration of the population to larger centres. Workers who are able to access EI as supplemental income in the off-season help keep these people in those rural and remote communities, so EI is important not just for the employment needs of tourism businesses that most often are the single anchor employer in the region, but is also essential to sustaining populations in those areas.²⁶

ACCESS TO EMPLOYMENT INSURANCE FOR WORKERS IN SEASONAL INDUSTRIES

Variable Entrance Requirement

To qualify for EI regular benefits, a claimant must have experienced an interruption of earnings from employment through no fault of their own (for example, due to a shortage of work, seasonal or mass layoffs), for a minimum of seven consecutive days. They must also have accumulated a certain number of hours of insurable employment during their qualifying period,²⁷ based on the rate of unemployment in their economic

23 HUMA, [Evidence](#), 31 October 2024, 1110 (Pinchbeck); HUMA, [Evidence](#), 31 October 2024, 1145 (Sirois); HUMA, [Evidence](#), 3 December 2024, 1110 (Brassard); HUMA, [Brief](#), CSN.

24 HUMA, [Evidence](#), 7 November 2024, 1135 (Potter); HUMA, [Evidence](#), 3 December 2024, 1115 (Brassard). See also HUMA, [Brief](#), FFAW-Unifor.

25 HUMA, [Evidence](#), 31 October 2024, 1125 (Sirois).

26 HUMA, [Evidence](#), 26 November 2024, 1215 (Mondor).

27 The qualifying period is, in most cases, the 52-week period preceding the start of the benefit period. If another benefit period started during the 52 previous weeks, the qualifying period is shorter and begins at the start of the last benefit period. EIA, s. 8(1).



region of residence.²⁸ This is referred to as the Variable Entrance Requirement or VER.²⁹ The EI program also includes a benefits regime tailored to self-employed fishers. Fishers may access regular fishing benefits as well as EI special benefits based on earnings rather than insurable hours of employment.³⁰

The number of hours of insurable employment required to qualify for EI regular benefits, based on the regional rate of unemployment, ranges from 420 hours in regions with unemployment rates of more than 13%, to 700 hours in regions with unemployment rates of 6% and under.³¹ Unemployment rates in the 62 EI economic regions are updated monthly on the federal government website.³²

A brief submitted by the Office of the Commissioner for Workers at the CEIC raised concerns that the scale of unemployment rates used for the VER is outdated, noting that it was first developed in the 1990s based on the national unemployment average at the time.³³ The brief explained that a mechanism was not provided for automatically adjusting this scale, making it “unusable in recent years when unemployment rates plummeted in all regions.”³⁴ This concern about falling unemployment rates was echoed by witnesses such as Angella MacEwen, Senior Economist, National Services, Canadian Union of Public Employees,³⁵ and Julie Brassard.³⁶ The Office of the Commissioner for Workers advocated for revising the unemployment rate scale – which is also used to determine the number of

28 EIA, ss. 7(1) and 7(2); and EIR, s. 14(1).

29 Employment and Social Development Canada (ESDC), “[1.2.2 Required number of hours to qualify – variable entrance requirement](#),” *Digest of Benefit Entitlement Principles Chapter 1 - Section 2*.

30 See EIR (Fishing); Government of Canada, [Digest of Benefit Entitlement Principles Chapter 15 – Fishing Benefits](#); and Government of Canada, “[What these benefits offer](#),” *EI fishing benefits*.

31 EIA, s. 7(2). Note that the number of insurable hours required to qualify for benefits is increased in cases of violations regarding prior EI claims. See EIA, s. 7.1(1). Note as well that in March 2025, as a part of series of temporary EI measures to improve access for “workers whose jobs are affected by the continued threat of tariffs” on Canadian goods by the United States, the federal government artificially increased the EI unemployment rate for all regions with rates under 13.1%. This measure applied to all claims beginning between 6 April 2025 and 11 October 2025 and had the effect of reducing the hours required to qualify for regular benefits and increasing the weeks of entitlement. ESDC, [Backgrounder on Employment Insurance measures introduced to support Canadian workers and employers](#).

32 Government of Canada, [Unemployment Rates for the EI Economic Regions](#).

33 HUMA, [Brief](#), Office of the Commissioner for Workers.

34 HUMA, [Brief](#), Office of the Commissioner for Workers. See also HUMA, [Evidence](#), 26 November 2024, 1205 (Pierre Laliberté, Commissioner for Workers, As an Individual).

35 HUMA, [Evidence](#), 31 October 2024, 1205 (MacEwen).

36 HUMA, [Evidence](#), 3 December 2024, 1110 (Brassard).

weeks of regular benefits available to claimants – “according to current labour market data.”³⁷

Some witnesses pointed out that falling unemployment rates do not necessarily indicate that it is easier to find a job. Angella MacEwen noted that a lower unemployment rate can reflect a decrease in labour market participation as well as the presence of “temporary migrant workers.”³⁸

Hours of Insurable Employment

Many witnesses recommended the adoption of a single, lower entrance criterion, either universally or specifically for workers in seasonal industries. Unifor and the Fish, Food, and Allied Workers Union – Unifor (FFAW-Unifor) recommended a threshold of 360 hours for all workers, noting that this would “benefit those who struggle in seasonal work to qualify due to external circumstances such as a delayed fishing season, natural disasters, and pandemics.”³⁹ Others called for a threshold of 420 hours.⁴⁰

While the Office of the Commissioner for Workers asserted that this change likely would “have no significant impact on the financial equilibrium and would not lead to an excessive increase in costs,”⁴¹ the CEIC’s Commissioner for Employers stated that “[e]mployers do not support a change to 420 hours as this would place a significant financial burden on the EI Account, which would then need to be paid for through increased premiums.” The Commissioner for Employers advocated for retaining the current system, asserting that “[m]aintaining the regional variation in the number of hours required to qualify for EI and basing that variation on the unemployment rate grounds the EI Program in labour market realities. It is not only the most cost effective but helps to maintain workers’ attachment to the labour force where possible.”⁴²

37 HUMA, [Brief](#), Office of the Commissioner for Workers.

38 HUMA, [Evidence](#), 31 October 2024, 1205 (MacEwen). See also HUMA, [Brief](#), FFAW-Unifor and HUMA, [Evidence](#), 26 November 2024, 1210 (Laliberté).

39 HUMA, [Brief](#), FFAW-Unifor; HUMA, [Brief](#), Unifor. See also HUMA, [Evidence](#), 31 October 2024, 1230 (MacEwen).

40 HUMA, [Evidence](#), 31 October 2024, 1115 (Thibodeau); HUMA, [Evidence](#), 31 October 2024, 1125 (Sirois); HUMA, [Evidence](#), 19 November 2024, 1230 (Symonds); HUMA, [Evidence](#), 26 November 2024, 1235 (Laliberté); HUMA, [Evidence](#), 3 December 2024, 1130 (Brassard); HUMA, [Brief](#), CSN; HUMA, [Brief](#), Office of the Commissioner for Workers.

41 HUMA, [Brief](#), Office of the Commissioner for Workers.

42 HUMA, [Brief](#), Commissioner for Employers.



Alternatively, some witnesses recommended lowering the number of hours required specifically for individuals in seasonal positions, or for workers in highly seasonal regions.⁴³

Taking into consideration the testimony received regarding the hours of insurable employment, the committee recommends the following:

Recommendation 1

That Employment and Social Development Canada study the impact of lowering the insurable employment threshold for workers in seasonal industries to qualify for Employment Insurance regular benefits, regardless of regional unemployment rates; and that it report its findings to the committee within one year of this report’s adoption in the House of Commons.

Employment Insurance Economic Regions

Unemployment rates for the purposes of the EI program are calculated for 62 designated economic regions.⁴⁴ Several witnesses called for an update to the EI economic regions to better reflect labour market conditions,⁴⁵ or for their abolishment altogether.⁴⁶ Angella MacEwen and Fernand Thibodeau, Spokesperson, Seasonal Workers Help and Support, both spoke to a situation in which highly seasonal communities may be lumped in with areas “with a completely different economic profile,” affecting the unemployment rate used to determine EI eligibility and duration.⁴⁷ The Office of the Commissioner for Workers highlighted that “some rural areas are disadvantaged by being associated with the same region as an urban centre, where employment opportunities are often greater.”⁴⁸ Line Sirois illustrated the contrasting circumstances of seasonal claimants in two regions with similar seasonal unemployment rates, but different overall unemployment rates:

The seasonal unemployment rate on the upper north shore [of Quebec] is ... similar to the rate in the Gaspé, while the benefit level is lower than in the Gaspé, given that it has major industrial operations ... As things stand now, people will need to have worked more hours to qualify for employment insurance in some regions even though they are

43 HUMA, [Evidence](#), 31 October 2024, 1145 (Pinchbeck); HUMA, [Evidence](#), 7 November 2024, 1135 (Potter); HUMA, [Brief](#), TIAC.

44 Government of Canada, [Canada’s Employment Insurance Economic Regions](#).

45 HUMA, [Evidence](#), 31 October 2024, 1115 (Thibodeau); HUMA, [Evidence](#), 31 October 2024, 1205 (MacEwen); HUMA, [Brief](#), Office of the Commissioner for Workers.

46 HUMA, [Evidence](#), 31 October 2024, 1125 (Sirois).

47 HUMA, [Evidence](#), 31 October 2024, 1205 (MacEwen); HUMA, [Evidence](#), 31 October 2024, 1115 (Thibodeau).

48 HUMA, [Brief](#), Office of the Commissioner for Workers.

similar in socio-economic or demographic terms. Seasonal jobs, however, are time-limited. This is the very picture of a vicious circle.⁴⁹

Pierre Laliberté, Commissioner for Workers (appearing as an individual), expressed concern about the lack of adjustments to the EI economic regions based on changes to the labour market and told the committee that “the Employment Insurance Commission is in charge of conducting the review every five years. ... Since 2000, however, our recommendations have not been taken up by the government.”⁵⁰

Access to Employment Insurance for Temporary Foreign Workers

Witnesses also noted the role of the Temporary Foreign Worker Program (TFWP),⁵¹ including the Seasonal Agricultural Worker Program,⁵² in meeting labour needs in the agriculture sector.⁵³ However, some raised concerns about the inability of temporary foreign workers to access EI regular benefits when they return to their home country, despite having paid into the EI program while working in Canada.⁵⁴ United Food and Commercial Workers Union Canada advocated for “[a]n expanded EI regime open to seasonal agricultural workers from foreign countries that drops the arbitrary requirement surrounding looking for work in Canada,” noting this “has the potential to maintain a consistent supply of knowledgeable and committed farmworkers who are financially secure during the off season.”⁵⁵ Unifor also recommended “[e]nsuring migrant workers have access to EI.”⁵⁶

Further, the Canadian Mushroom Growers’ Association raised the issue of work permit processing errors made by Immigration, Refugees and Citizenship Canada, stating these

49 HUMA, *Evidence*, 31 October 2024, 1100 (Sirois).

50 HUMA, *Evidence*, 26 November 2024, 1205, 1225 (Laliberté).

51 ESDC, *Temporary Foreign Worker*.

52 ESDC, *Hire a temporary worker through the Seasonal Agricultural Worker Program: Overview*.

53 HUMA, *Evidence*, 31 October 2024, 1200 (Krayden); HUMA, *Evidence*, 26 November 2024, 1210 (Allan Melvin, President, Nova Scotia Federation of Agriculture, Canadian Federation of Agriculture); HUMA, *Evidence*, 26 November 2024, 1240 (Berrigan); *Brief*, United Food and Commercial Workers Union (UFCW) Canada.

54 HUMA, *Evidence*, 26 November 2024, 1210 (Melvin); HUMA, *Brief*, UFCW Canada.

55 HUMA, *Brief*, UFCW Canada.

56 HUMA, *Brief*, Unifor.



represent “costly errors to the farm and to the TFWP [agricultural stream] employee who is then not allowed to work because they are out of status with no access to EI.”⁵⁷

EMPLOYMENT INSURANCE BENEFITS AND WORKERS IN SEASONAL INDUSTRIES

When discussing the adequacy of EI benefits for workers in seasonal industries, witnesses described the economic pressures facing workers, including the rising cost of living.⁵⁸ The committee heard about workers who had to rely on food banks after running out of EI benefits before their seasonal jobs resumed.⁵⁹ Witnesses also spoke about insufficient or unaffordable housing in their communities,⁶⁰ citing the case of a senior who had to return to seasonal work as a result of high housing costs.⁶¹ With a view to improving EI benefits for workers in the seasonal industry, many witnesses made specific recommendations to the committee about the amount and duration of these benefits.

Best Weeks

In the case of EI regular benefits, weekly benefits are equal to 55% of the claimant’s insurable earnings during their variable best (i.e., highest-paid) weeks over the qualifying period, up to a maximum amount. The number of best weeks used to calculate weekly benefits varies depending on the regional rate of unemployment; it can range from 14 weeks for regions with an unemployment rate of more than 13%, to 22 weeks for regions with an unemployment rate of 6% or less.⁶² Best weeks are also referred to as the divisor.⁶³

57 HUMA, [Brief](#), Canadian Mushroom Growers’ Association.

58 See, for example, HUMA, [Evidence](#), 7 November 2024, 1125 (Potter); and HUMA, [Evidence](#), 3 December 2024, 1120 (Brassard).

59 HUMA, [Evidence](#), 19 November 2024, 1225 (Symonds); HUMA, [Evidence](#), 3 December 2024, 1120 (Brassard).

60 HUMA, [Evidence](#), 31 October 2024, 1145 (Pinchbeck); HUMA, [Evidence](#), 31 October 2024, 1150 (Sirois); HUMA, [Evidence](#), 31 October 2024, 1150 (Thibodeau); HUMA, [Evidence](#), 19 November 2024, 1240 (Symonds).

61 HUMA, [Evidence](#), 19 November 2024, 1240 (Symonds).

62 EIA, s. 14(2).

63 Government of Canada, “[How much you could receive](#),” *EI regular benefits*.

Witnesses explained the challenges facing workers with a divisor on the higher end, such as 20 or 22.⁶⁴ Julie Brassard described the situation in her region as follows:

Our seasonal workers obviously don't get 22 weeks of work. In most cases, they get 15. The divisor used to calculate their best weeks benefit rate includes all their weeks. If they worked for 15 weeks, all their earnings are added up and the total is divided by 22. Then it is multiplied by 55%. As a result, a lot of people receive EI benefits of \$150 or \$200 a week.⁶⁵

The Office of the Commissioner for Workers pointed out that, as with the unemployment rate scale used for the VER, the scale for best weeks “[reflects] the reality of the time in which [it was] introduced.” However, a decline in unemployment rates has “reduced the number of weeks included in the calculation of the best weeks, resulting in a net decrease in weekly benefits paid.” In light of this, the Office of the Commissioner for Workers recommended that this scale be revised.⁶⁶

Rather than a variable scale, several witnesses supported the use of a standard divisor of 12 weeks, in general or specifically for workers in seasonal industries.⁶⁷ Julie Brassard suggested 10 or 15 weeks, noting that this way, “the calculation will at least include the weeks when people worked full time and earned the best incomes,” in recognition of the fact that seasonal work in the tourism industry is often part-time at the beginning and end of the season.⁶⁸ Pierre Laliberté recommended “[setting] the number of best weeks at 14 for everyone.”⁶⁹

Also on the topic of divisors, FFAW-Unifor recommended “[maintaining] the divisor as determined by the rate of unemployment at the start of the working season throughout for consistent and stable benefit eligibility criteria.” In its brief, the organization described an “unforeseen financial crisis” for seasonal fishery workers in Newfoundland and Labrador in 2023, when the unemployment rate in their EI economic region fell “just as the fishing season was winding down,” suddenly changing the divisor, raising the

64 HUMA, [Evidence](#), 19 November 2024, 1210 (Symonds); HUMA, [Evidence](#), 3 December 2024, 1130 (Brassard).

65 HUMA, [Evidence](#), 3 December 2024, 1130 (Brassard).

66 HUMA, [Brief](#), Office of the Commissioner for Workers.

67 HUMA, [Evidence](#), 31 October 2024, 1115 (Thibodeau); HUMA, [Evidence](#), 31 October 2024, 1125 (Sirois); HUMA, [Evidence](#), 3 December 2024, 1135 (Brassard); HUMA, [Brief](#), CSN; HUMA, [Brief](#), Unifor.

68 HUMA, [Evidence](#), 3 December 2024, 1135 (Brassard).

69 HUMA, [Evidence](#), 26 November 2024, 1235 (Laliberté). See also HUMA, [Brief](#), Office of the Commissioner for Workers.



threshold for the minimum number of insurable hours, and decreasing the number of weeks of benefits workers could access.⁷⁰

Considering the above-noted testimony, the committee recommends the following:

Recommendation 2

That the Government of Canada consider implementing a standard divisor for workers in seasonal industries, regardless of the unemployment rate in their economic region.

Benefit Rate

Witnesses also made recommendations about the benefit rate – for example, increasing the current rate of 55% to 70%⁷¹ or 75%, either universally or specifically for workers in seasonal industries.⁷² In addition, some witnesses recommended implementing a benefit floor, with Unifor and FFAW-Unifor suggesting a \$500 floor for seasonal claimants.⁷³ However, the Commissioner for Employers warned that increasing the benefit rate to 70% for all claimants would be unaffordable, citing a potential increase in the EI premium rate and “significant debt” resulting from COVID-era claims and temporary measures, and asserting that “[we] cannot consider adding any costs to the EI Account while this debt exists.”⁷⁴

Duration of Benefits

The Employment Insurance “Black Hole”

The committee heard about the EI “black hole,” referring to a situation in which some workers in seasonal industries have an insufficient number of weeks of benefits to get them through the off-season.⁷⁵

70 HUMA, [Brief](#), FFAW-Unifor.

71 HUMA, [Evidence](#), 31 October 2024, 1125 (Sirois); HUMA, [Evidence](#), 19 November 2024, 1230 (Symonds).

72 HUMA, [Brief](#), FFAW-Unifor; HUMA, [Brief](#), Unifor.

73 HUMA, [Evidence](#), 31 October 2024, 1230 (MacEwen); HUMA, [Brief](#), FFAW-Unifor; HUMA, [Brief](#), Unifor.

74 HUMA, [Brief](#), Commissioner for Employers.

75 HUMA, [Brief](#), CSN; HUMA, [Brief](#), Office of the Commissioner for Workers.

An eligible claimant can receive 14 to 45 weeks of EI regular benefits in a benefit period,⁷⁶ based on the regional unemployment rate and the number of hours of insurable employment accumulated during the qualifying period. The lower the regional unemployment rate, the lower the maximum number of weeks of benefits and the higher the number of hours of insurable employment required to obtain the maximum number of weeks. The higher the unemployment rate, the lower the number of hours of insurable employment required to obtain the maximum number of weeks.⁷⁷ In addition, a temporary measure, first established in 2018, provides eligible seasonal claimants with additional weeks of EI regular benefits.

While Julie Brassard told the committee that the seasonal gap “varies greatly from one person to another,”⁷⁸ the committee heard that decreases in unemployment rates had exacerbated the issue,⁷⁹ with Line Sirois indicating that for some workers, the period without benefits can last as long as 18 weeks.⁸⁰

Several witnesses referenced the disproportionate effect of the black hole on women, in part due to women being more likely to work in lower-earning or part-time jobs and to be unable to leave their region to work due to care responsibilities for children and aging parents.⁸¹

Fernand Thibodeau told the committee that the black hole “leads to further devitalization of our regions. People are tired of constantly living in a precarious situation, and young people are moving away. It amounts to deportation by stealth.”⁸²

76 The benefit period refers to the period during which EI benefits may be paid to claimants who qualify to receive them. Generally, this is a 52-week period. This does not mean that benefits will be paid in each week, but rather that the benefits for which the claimant qualifies must be paid during this period. EIA, ss. 9 and 10(2). Note that in September 2025, the federal government announced a temporary measure providing extra weeks of EI regular benefits to “long-tenured” workers, applying to claims starting between 15 June 2025 and 11 April 2026. Mark Carney, Prime Minister of Canada, [*Prime Minister Carney launches new measures to protect, build, and transform Canadian strategic industries*](#), News release, 5 September 2025; Government of Canada, [*Temporary Employment Insurance measures to respond to major changes in economic conditions*](#).

77 EIA, s. 12(2) and Schedule I.

78 HUMA, [*Evidence*](#), 3 December 2024, 1125 (Brassard).

79 HUMA, [*Evidence*](#), 31 October 2024, 1115 (Thibodeau); HUMA, [*Evidence*](#), 31 October 2024, 1205 (MacEwen).

80 HUMA, [*Evidence*](#), 31 October 2024, 1100 (Sirois).

81 HUMA, [*Evidence*](#), 31 October 2024, 1100, 1155 (Sirois); HUMA, [*Evidence*](#), 31 October 2024, 1155 (Thibodeau); HUMA, [*Evidence*](#), 31 October 2024, 1155 (Pinchbeck); HUMA, [*Evidence*](#), 19 November 2024, 1230 (Symonds); HUMA, [*Evidence*](#), 3 December 2024, 1140 (Brassard).

82 HUMA, [*Evidence*](#), 31 October 2024, 1115 (Thibodeau).



Maximum Weeks of Benefits

The Office of the Commissioner for Workers recommended “a substantial revision of the duration of payments,” with resulting flexibilities extended to all workers.⁸³ Other witnesses proposed specific changes, with FFAW-Unifor and Unifor advocating for 50 weeks of benefits for all workers;⁸⁴ Mandy Symonds, President, Southern Nova Scotia Seasonal Workers Alliance recommending 20 to 25 weeks of benefits for those who meet the minimum hours threshold;⁸⁵ and Fernand Thibodeau and Line Sirois recommending 35 weeks of benefits.⁸⁶

Temporary Employment Insurance Measure for Seasonal Claimants

In 2018, the federal government introduced Pilot Project No. 21, which provided eligible seasonal claimants residing in one of 13 high seasonal EI claim regions with up to five additional weeks of regular benefits, to a maximum of 45 weeks.⁸⁷ The parameters of the pilot project have since been replicated in the EIA as a temporary measure,⁸⁸ and extended by successive government legislation.⁸⁹ As of March 2026, the temporary measure is valid for benefit periods taking place between 26 September 2021 and 24 October 2026.⁹⁰ For benefit periods starting between 10 September 2023 and 7 September 2024, nine additional weeks of benefits may have been available, rather than five.⁹¹

83 HUMA, [Brief](#), Office of the Commissioner for Workers.

84 HUMA, [Brief](#), FFAW-Unifor; HUMA, [Brief](#), Unifor.

85 HUMA, [Evidence](#), 19 November 2024, 1230 (Symonds).

86 HUMA, [Evidence](#), 31 October 2024, 1115 (Thibodeau); HUMA, [Evidence](#), 31 October 2024, 1135 (Sirois).

87 [Regulations Amending the Employment Insurance Regulations \(Pilot Project No. 21\)](#), SOR/2018-228, 2 November 2018, in *Canada Gazette*, Part II, 14 November 2018, p. 4177.

88 See [Budget Implementation Act, 2021, No. 1](#), S.C. 2021, c. 23, Part 4, Division 35; and EIA, s. 12(2.3).

89 [Budget Implementation Act, 2022, No. 1](#), S.C. 2022, c. 10, Part 5, Division 27; [Budget Implementation Act, 2023, No. 1](#), S.C. 2023, c. 26, Part 4, Division 35; [Budget Implementation Act, 2024, No. 1](#), S.C. 2024, c. 17, Part 4, Division 23.

90 [Budget Implementation Act, 2024, No. 1](#), S.C. 2024, c. 17, s. 259; EIA, 12(2.3)(a)(i).

91 This temporarily enhanced support was announced in the *2023 Fall Economic Statement* to respond to “recent anomalies in regional unemployment rates” resulting in longer income gaps for some seasonal workers and is established in the EIR as Pilot Project No. 22. See Department of Finance Canada, [2023 Fall Economic Statement, 2023](#), p. 43; EIR, s. 77.993 and Schedule II.94; and [Regulations Amending the Employment Insurance Regulations \(Pilot Project No. 22\)](#), SOR/2023-272, 8 December 2023, in *Canada Gazette*, Part II, 20 December 2023, p. 3863.

To qualify as a seasonal worker for the purposes of the temporary measure, a claimant must meet the “seasonal worker” criteria (meaning they received regular or fishing benefits from at least three EI claims in the past five years, and at least two of those claims started about the same time of year as their current claim); or must have met the criteria on an EI claim that started between 5 August 2018 and 25 September 2021.⁹²

Witnesses acknowledged that the temporary measure has been helpful for workers,⁹³ with the Confédération des syndicats nationaux (CSN) stating in its brief that “the end of the pilot project would be catastrophic.”⁹⁴ At the same time, witnesses argued that the measure is not sufficient to close the income gap for all workers in the seasonal industry.⁹⁵ For example, FFAW-Unifor highlighted that the additional weeks of benefits are not available to fish harvesters.⁹⁶ Witnesses made recommendations regarding the number of additional weeks, the regions to be included, and the determination of eligibility for seasonal claimants.

Specifically, multiple witnesses recommended that the temporary measure be extended to allow for up to 15 additional weeks of benefits,⁹⁷ with some indicating this should be up to a maximum of 35 weeks⁹⁸ or 45 weeks.⁹⁹

In addition, Pierre Laliberté recommended including a greater number of regions in the temporary measure, particularly northern regions where travel between villages is difficult.¹⁰⁰ In its brief, the Office of the Commissioner for Workers stated that regions

92 Service Canada, [Additional weeks of Employment Insurance regular benefits for seasonal workers in targeted regions](#).

93 HUMA, [Evidence](#), 31 October 2024, 1115 (Thibodeau); HUMA, [Evidence](#), 7 November 2024, 1135 (Potter).

94 HUMA, [Brief](#), CSN.

95 HUMA, [Evidence](#), 31 October 2024, 1115 (Thibodeau); HUMA, [Evidence](#), 31 October 2024, 1205 (MacEwen); HUMA, [Brief](#), Office of the Commissioner for Workers.

96 HUMA, [Brief](#), FFAW-Unifor. A 2024 question period note from ESDC confirms that “[t]he additional weeks of benefits provided by the temporary measures for seasonal claimants are not available to self-employed fishers claiming fishing benefits.” ESDC, [Question Period Note: END OF THE TEMPORARY MEASURE FOR SEASONAL WORKERS IMPACTED BY DECLINING UNEMPLOYMENT RATES](#), 2 October 2024.

97 HUMA, [Evidence](#), 31 October 2024, 1115 (Thibodeau); HUMA, [Evidence](#), 31 October 2024, 1135 (Sirois); HUMA, [Evidence](#), 31 October 2024, 1205 (MacEwen); HUMA, [Evidence](#), 3 December 2024, 1130 (Brassard); HUMA, [Brief](#), CSN; HUMA, [Brief](#), Office of the Commissioner for Workers.

98 HUMA, [Evidence](#), 26 November 2024, 1235 (Laliberté); HUMA, [Brief](#), Unifor; HUMA, [Brief](#), Office of the Commissioner for Workers.

99 HUMA, [Evidence](#), 31 October 2024, 1115 (Thibodeau).

100 HUMA, [Evidence](#), 26 November 2024, 1235 (Laliberté). See also HUMA, [Brief](#), Office of the Commissioner for Workers.



should be included “solely on the basis of the proportion of seasonal jobs in the local employment pool.”¹⁰¹

Witnesses also commented on the best ways to identify seasonal claimants for the purposes of the temporary measure. With regard to eligibility, Unifor recommended that the benefits be available “for all workers in seasonal industries, including those who have not yet accumulated three claims.”¹⁰² Pierre Laliberté argued that the current method requiring a number of previous EI claims excludes young people,¹⁰³ while the CSN stated that it “unfairly penalizes newly hired workers.”¹⁰⁴ Fernand Thibodeau called the current eligibility rules “complicated and arbitrary,”¹⁰⁵ and Line Sirois referred to “numerous administrative tangles and traps hidden in this clumsy, ill-adapted scheme that seems to be designed to deter claimants.”¹⁰⁶

As a result, witnesses recommended identifying seasonal claimants based on the record of employment (ROE)¹⁰⁷ – for example, indicating on the ROE whether a layoff is temporary,¹⁰⁸ or more specifically, indicating “seasonal layoff” or “layoff of a seasonal employer.”¹⁰⁹ The Commissioner for Employers indicated this could include a recall date “to demonstrate a truly seasonal position and the employer's intent to rehire once the season begins again.”¹¹⁰

Finally, the CSN recommended “granting an hours credit to workers who qualify for the pilot project.” As explained above, the number of insurable hours of employment an

101 HUMA, [Brief](#), Office of the Commissioner for Workers.

102 HUMA, [Brief](#), Unifor. See also HUMA, [Brief](#), Office of the Commissioner for Workers.

103 HUMA, [Evidence](#), 26 November 2024, 1255 (Laliberté). See also HUMA, [Evidence](#), 31 October 2024, 1155 (Sirois).

104 HUMA, [Brief](#), CSN.

105 HUMA, [Evidence](#), 31 October 2024, 1115 (Thibodeau).

106 HUMA, [Evidence](#), 31 October 2024, 1100 (Sirois).

107 An employer is required to issue a record of employment (ROE) each time an employee experiences an interruption of earnings. ESDC explains that “Service Canada uses the information on the ROE to determine whether a person is eligible to receive EI benefits, what the benefit amount will be, for how long the benefits will be paid and to ensure that no one misuses EI funds or receives benefits in error.” Various codes are used to designate the reason for issuing the ROE, signifying reasons such as a shortage of work (layoff), illness or injury, or the employee having quit. ESDC, [Record of employment](#); Service Canada, [Employment Insurance: How to Complete the Record of Employment Form](#), 2021.

108 HUMA, [Evidence](#), 31 October 2024, 1115 (Thibodeau).

109 HUMA, [Evidence](#), 26 November 2024, 1255 (Laliberté). See also HUMA, [Brief](#), CSN; HUMA, [Brief](#), Office of the Commissioner for Workers.

110 HUMA, [Brief](#), Commissioner for Employers. See also HUMA, [Evidence](#), 31 October 2024, 1205 (MacEwen).

individual has obtained during the qualifying period impacts their eligibility for EI regular benefits as well as the number of weeks of benefits they may receive.¹¹¹

Considering the testimony, the committee recommends the following:

Recommendation 3

That the Government of Canada amend the record of employment form to include an option to identify whether a worker has experienced a seasonal layoff.

Recommendation 4

That the Government of Canada permanently increase the number of weeks of Employment Insurance regular benefits available to workers in seasonal industries, aiming to solve the Employment Insurance “black hole” issue; and that, until this is implemented, the government continue to renew the temporary measure providing additional weeks of regular benefits to seasonal claimants in select regions.

FACILITATING OFF-SEASON WORK

Witnesses emphasized the importance of supporting workers in seasonal industries through the EI program while also facilitating and encouraging work during the off-season,¹¹² and not disincentivizing claimants from working.¹¹³

Multiple witnesses pointed to the EI system features they saw as penalizing workers in seasonal industries who pursue other employment during the off-season. For example, an eligibility criterion for EI benefits is valid job separation, meaning a worker has left their employment for a reason considered acceptable by the EI program. Certain circumstances, including reasonable assurance of another employment in the immediate future, may be considered just cause for voluntarily leaving employment.¹¹⁴ However, the Office of the Commissioner for Workers explained:

A seasonal claimant who works a secondary job during the off-season and abandons it to return to their main job the following season has to justify their voluntary departure to Service Canada. In addition to likely causing late payments, many find these controls

111 HUMA, *Brief*, CSN.

112 HUMA, *Brief*, TIAC.

113 HUMA, *Evidence*, 19 November 2024, 1215 (Tulk-Lane); HUMA, *Brief*, Commissioner for Employers.

114 See ESDC, *Employment Insurance (EI): Quitting your job*; and ESDC, *Digest of Benefit Entitlement Principles Chapter 6 - Section 8*.



stressful. Claimants who work two jobs each year and apply for benefits are required to undergo these checks every year, even if their circumstances have not changed.¹¹⁵

Similarly, Pierre Laliberté noted that while a worker can perform temporary work during the off-season and leave it to return to seasonal employment without penalty, the burden of proof is on the claimant. If they take on a permanent job during the off-season, their hours can be rejected.¹¹⁶

Julie Brassard described the situation of workers who take on multiple jobs to obtain more hours of insurable employment, and risk losing the insurable hours obtained from their jobs if they voluntarily leave one.¹¹⁷

Witnesses made a range of recommendations to better facilitate work, including the following:

- Increasing flexibility for Working While on Claim,¹¹⁸ allowing workers in seasonal industries to keep more of their earnings. The Commissioner for Employers noted that employers saw this program as a useful tool and that it “incentivizes workers to work in the shoulder- and off-seasons and would help retain experienced employees in those industries;”¹¹⁹
- “Offering incentives for those who take on temporary positions during low-demand periods;”¹²⁰
- “[Exploring] initiatives that promote job-matching.” The Commissioner of Employers stated that “[e]mployers believe greater effort could be placed on supporting workers in finding seasonal jobs beyond the season in which they typically work (job matching in the off seasons). For example, a seasonal worker who works a summer job could also work during the

115 HUMA, [Brief](#), Office of the Commissioner for Workers.

116 HUMA, [Evidence](#), 26 November 2024, 1255 (Laliberté).

117 HUMA, [Evidence](#), 3 December 2024, 1150 (Brassard). See also HUMA, [Brief](#), Unifor.

118 Working While on Claim provisions allow eligible claimants to work partial hours while receiving EI benefits and keep 50 cents of their benefits for every dollar they earn, up to a maximum of 90% of the weekly insurable earnings used to calculate their EI benefit amount. EIA, s. 19(2); ESDC, [EI regular benefits: While on EI](#); ESDC, [Employment Insurance – Working While on Claim](#).

119 HUMA, [Evidence](#), 31 October 2024, 1225 (MacEwen); HUMA, [Brief](#), Commissioner for Employers.

120 HUMA, [Evidence](#), 7 November 2024, 1110 (Potter).

fall, winter, or spring in other lines of work. Job matching is particularly critical in increasingly tight labour markets.”¹²¹

- Introducing a tourism-specific work-sharing¹²² model that would allow employers to share employees across businesses during slower periods or would extend the work-sharing program throughout the year, or increasing the number of work-sharing agreements available to tourism employers so they could keep workers employed part-time through the off-season, allowing them to access partial benefits while continuing to work.¹²³

Finally, the Commissioner for Employers raised concerns that a uniform 420-hour entrance requirement, as recommended by some witnesses, could reinforce disincentives to work, noting that some employers reported workers requesting to be laid off once they have met the minimum hours requirement for EI. In this vein, the Commissioner for Employers recommended strengthening EI integrity measures; for example, with “greater efforts made to track and validate job search efforts.”¹²⁴

Based on this testimony, the committee recommends the following:

Recommendation 5

That the Government of Canada take measures to encourage workers in seasonal industries to pursue employment during the off-season, such as allowing them to keep more of their earnings through the Working While on Claim program; and that the government review the Employment Insurance program requirements relating to valid job separation for workers in the seasonal industry, ensuring that these requirements do not unintentionally penalize workers who pursue employment during the off-season.

121 HUMA, [Brief](#), Commissioner for Employers.

122 The Work-Sharing Program aims to help employers avoid layoffs when there is a temporary decrease in the normal level of business activity beyond the employer’s control, by providing income support to eligible employees who work a temporarily reduced work week. EIA, s. 24; EIR, ss. 42-49; ESDC, [Work-Sharing Program](#). Note that between 7 March 2025 and 6 March 2026, temporary flexibilities to the Work-Sharing Program were in place “in response to the threat or potential realization of tariffs.” See ESDC, “[Special measures](#),” [Work-Sharing Program](#).

123 HUMA, [Brief](#), TIAC.

124 HUMA, [Brief](#), Commissioner for Employers.



OTHER CONSIDERATIONS

Premium Rates

The EI program is financed by employer and employee contributions in the form of EI premiums. The EI premium rates for employees and employers are set annually by the CEIC.¹²⁵ While one witness advocated for increasing EI premium rates,¹²⁶ some industry and employer representatives argued against an increase or for a decrease.¹²⁷ The Commissioner for Employers stated:

Let me be unequivocal: employers do not support an increase in the EI Premium Rate. Although the rate decreased from 2024, the amount that employers and workers pay in EI continues to go up each year. This is because the EI Premium Rate is multiplied against earnings.¹²⁸

The committee also heard that employers do not support EI program cost increases that would result in higher premium rates, including “lowering entrance requirements, increasing the benefit rate, [or] duration of benefits.”¹²⁹

Beth Potter, as well as the Tourism Industry Association of Canada, advocated for decreasing the EI premium rate from 1.66% (the rate in 2024, when the study was taking place) to 1.58%.¹³⁰ Beth Potter cited the financial pressures facing businesses “with rising costs, increased EI premiums and ongoing bankruptcies” and stated that a decrease to 1.58% “would provide relief for small businesses and their employees, many of whom are young workers and newcomers in accommodation and food services, who rely on this income to support their education.”¹³¹

125 EIA, Parts III and IV. See also ESDC, [Canada Employment Insurance Commission \(CEIC\)](#).

126 HUMA, [Evidence](#), 31 October 2024, 1250 (MacEwen).

127 HUMA, [Evidence](#), 7 November 2024, 1110 (Potter); HUMA, [Evidence](#), 19 November 2024, 1205 (Tulk-Lane); HUMA, [Evidence](#), 26 November 2024, 1215 (Mondor); HUMA, [Brief](#), Commissioner for Employers; HUMA, [Brief](#), TIAC.

128 HUMA, [Brief](#), Commissioner for Employers.

129 Ibid.

130 Government of Canada, “[EI premium rates and maximums](#),” *Calculate payroll deductions and contributions*; HUMA, [Brief](#), TIAC; HUMA, [Evidence](#), 7 November 2024, 1110 (Potter). See also HUMA, [Evidence](#), 26 November 2024, 1215 (Mondor).

131 HUMA, [Evidence](#), 7 November 2024, 1110 (Potter). See also HUMA, [Brief](#), TIAC.

Training

Witnesses also made recommendations related to worker training. Regarding the importance of training to the retention of workers in the agriculture industry, Allan Melvin, President of the Nova Scotia Federation of Agriculture, stated:

Historically, the unique skills required by many agricultural operations place an onus on on-the-job training and other informal educational approaches, such as online education modules produced through [the Canadian Agricultural Human Resource Council], workshops held by equipment manufacturers, and other non-traditional educational arrangements. These sector-specific training opportunities have not always been eligible for EI-funded support, despite the crucial role they play in retention during less labour-intensive seasons.¹³²

Angella MacEwen and Allan Melvin both raised concerns about the decreased allocation for Labour Market Development Agreements in 2024.¹³³ These agreements with the provinces and territories, part of the Employment Benefits and Support Measures set out in Part II of the EIA, enable the provision of EI-funded training and employment assistance.¹³⁴

Angella MacEwen recommended investing in training, pointing to labour market transitions brought about by climate change and artificial intelligence, and highlighted a need, for example, for digital literacy training to increase productivity.¹³⁵ Brodie Berrigan, Senior Director, Government Relations and Farm Policy, Canadian Federation of Agriculture, recommended broadening the list of training activities eligible for EI-funded support, “looking at other types of non-traditional training activities like short-term certifications and online-based training and workshops,” as well as providing wraparound supports for workers, such as “transportation to and from training facilities or training opportunities and employment counselling.”¹³⁶

132 HUMA, [Evidence](#), 26 November 2024, 1210 (Melvin).

133 HUMA, [Evidence](#), 31 October 2024, 1220 (MacEwen); HUMA, [Evidence](#), 26 November 2024, 1210 (Melvin). In Budget 2017, the federal government proposed an additional \$2.7 million for the Labour Market Transfer Agreements, including Labour Market Development Agreements, over six years. This additional funding was not renewed in Budget 2024. See Department of Finance Canada, [Building a Strong Middle Class](#), Budget 2017; and Department of Finance Canada, [Fairness for Every Generation](#), Budget 2024. Note, however, the 2025 federal budget allocated \$570 million over three years, starting in 2025-26, through Labour Market Development Agreements “to support training and employment assistance for workers impacted by tariffs and global market shifts.” Department of Finance Canada, [Canada Strong](#), Budget 2025.

134 ESDC, [About the Labour Market Development Agreements program](#); EIA, Part II.

135 HUMA, [Evidence](#), 31 October 2024, 1220, 1250 (MacEwen).

136 HUMA, [Evidence](#), 26 November 2024, 1245 (Berrigan).



Angella MacEwen also pointed to the eligibility of apprentices to collect EI while pursuing their training, and recommended exploring a similar arrangement for entry-level workers in industries with labour shortages, such as childcare and healthcare.¹³⁷

Comprehensive Reform

Considering the testimony received over the course of this study, the committee recommends:

Recommendation 6

That the Government of Canada undertake, without delay, a comprehensive reform of the Employment Insurance system in order to adapt it to the current realities of the labour market, particularly those of regions and industries with a strong seasonal component, by reviewing eligibility criteria, the duration of benefits, and the method used to calculate benefits, with the objective of ensuring an adequate, predictable, and equitable income replacement that respects the dignity of workers.

CONCLUSION

Over the course of this study, the committee received a wealth of testimony about the challenges facing workers in seasonal industries with regard to the EI program, as well as recommendations for reform. Witnesses discussed the difficulties some workers face in qualifying for benefits during the off-season; the importance of ensuring that the benefits offered are sufficient to support workers during this period; and the need to enable and encourage off-season employment.

Based on findings from this study, the committee sees opportunities for the federal government to re-examine, in relation to workers in seasonal industries, the hours of insurable employment required to qualify for EI regular benefits; the divisor used to calculate the number of weeks of benefits that workers qualify for; and the number of weeks of benefits available to these workers, aiming to resolve the EI “black hole” issue. It also makes recommendations related to the identification of workers in seasonal industries for the purposes of the EI program, and the need to ensure that the program parameters encourage, rather than disincentivize, off-season work.

137 HUMA, *Evidence*, 31 October 2024, 1220 (MacEwen).

APPENDIX A: LIST OF WITNESSES

The following table lists the witnesses who appeared before the committee at its meetings related to this report. Transcripts of all public meetings related to this report are available on the committee’s [webpage for this study](#).

44th Parliament – 1st Session

Organizations and Individuals	Date	Meeting
Action-Chômage Côte-Nord Line Sirois, Chief Executive Officer	2024/10/31	133
Canadian Mushroom Growers' Association Janet Krayden, Agricultural Workforce Expert	2024/10/31	133
Canadian Ski Council Paul Pinchbeck, President and Chief Executive Officer	2024/10/31	133
Canadian Union of Public Employees Angella MacEwen, Senior Economist, National Services	2024/10/31	133
Seasonal Workers Help and Support Fernand Thibodeau, Spokesperson	2024/10/31	133
Tourism Industry Association of Canada Beth Potter, President and Chief Executive Officer	2024/11/07	135
Atlantic Chamber of Commerce Rhonda Tulk-Lane, Chief Executive Officer	2024/11/19	136
Southern Nova Scotia Seasonal Workers Alliance Mandy Symonds, President	2024/11/19	136
As an individual Pierre Laliberté, Commissioner for Workers	2024/11/26	138
Canadian Federation of Agriculture Brodie Berrigan, Senior Director, Government Relations and Farm Policy Allan Melvin, President, Nova Scotia Federation of Agriculture	2024/11/26	138

Organizations and Individuals	Date	Meeting
Tourism HR Canada Philip Mondor, President and Chief Executive Officer	2024/11/26	138
Mouvement Action-Chômage de Charlevoix Julie Brassard, Chief Executive Officer	2024/12/03	139

APPENDIX B: LIST OF BRIEFS

The following is an alphabetical list of organizations and individuals who submitted briefs to the committee related to this report. For more information, please consult the committee's [webpage for this study](#).

44th Parliament – 1st Session

Canada Employment Insurance Commission

Canadian Mushroom Growers' Association

Confédération des syndicats nationaux

Fish, Food and Allied Workers Union

Tourism Industry Association of Canada

Unifor

United Food and Commercial Workers Union Canada

REQUEST FOR GOVERNMENT RESPONSE

Pursuant to Standing Order 109, the committee requests that the government table a comprehensive response to this Report.

A copy of the relevant *Minutes of Proceedings* ([Meetings Nos. 4, 22, 23 and 24](#)) from the 45th Parliament, 1st Session and ([Meetings Nos. 133, 135, 136, 138 and 139](#)) from the 44th Parliament, 1st Session is tabled.

Respectfully submitted,

Robert Morrissey
Chair

Dissenting Report: Creating Jobs in Canada

A central goal of government policy must be to maximize the ability of Canadians to obtain and maintain employment. A job can be both a source of sustenance and a source of meaning.

Many Canadians work to provide for themselves and their families and to be part of a community of meaning in which they contribute to and feel the value of their contributions to society.

This recognition of the importance of work leads Conservatives to propose policies which maximize the ability of every Canadian to get a job. All governments must pay close attention to whether the policies they put in place incentivize or disincentivize the creation of jobs.

The Committee's study on Workers in the Seasonal Industry and the Employment Insurance Program examined important challenges facing Canadians who rely on seasonal employment. Conservatives recognize that seasonal industries – such as fisheries, tourism, agriculture, and forestry – are vital to many regions of the country and that workers in these sectors face unique realities.

In our engagement with that report, it is necessary to make some observations about the nature of the EI program in general. To illustrate a broader policy point, consider two companies generating identical pre-tax profits. Company A employs twice as many workers as Company B. Company A supports twice as many families and contributes more directly to the wellbeing of its community through employment. In this situation, Company A actually pays higher taxes than Company B, since payroll taxes for Employment Insurance and certain other programs are charged per employee. Firms that create more jobs bear a higher payroll tax burden.

It is worth considering in general if it is fair or desirable that companies creating more jobs be asked to pay higher taxes. In a time of high unemployment and especially high youth unemployment, policy makers must consider how to incentivize companies to create more jobs.

Conservatives believe that Canada should certainly not be INCREASING payroll taxes. As Canadian businesses face already high tax and regulatory barriers, economic uncertainty, and ongoing affordability challenges, increasing payroll taxes risks discouraging hiring, particularly in small and seasonal businesses already operating on tight margins.

Conservative respectfully dissent from this report in light of its lack of engagement with issues around the costs associated with the proposed changes and the negative impact that such costs would have on employment. New proposals would have to be paid for, in the absence of other reforms, through an increase in payroll taxes. Increases in payroll taxes, especially in an environment of existing high unemployment, would lead to more job losses, particularly in small and seasonal businesses already operating on tight margins. These further job losses would in turn create more demand for Employment Insurance and further strain the EI fund.

In light of the government's position on this report, Liberals need to clarify their position with respect to EI premium increases. Do they support EI premium increases, or do they propose to fund the new measures introduced in this report through other unspecified means? What exactly is their position on the role of jobs in society and on the impact of payroll taxes on job creation?

Public policy must aim not only to provide temporary income support, but also to foster conditions in which more Canadians can find meaningful, sustained employment. Any changes to Employment Insurance must reflect that principle.