

PROVINCIAL ACTION NETWORK
ON THE STATUS OF WOMEN
PANSOW

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May 5, 2023

To The Honourable Andrew Furey, Premier of Newfoundland and Labrador
The Honourable Siobhan Coady, Deputy Minister and Minister of Finance
The Honourable Pam Parsons, Minister Responsible for Women and Gender
Equality
The Honourable Bernard Davis, Minister of Environment and Climate Change
and Minister Responsible for Labour

On behalf of the Provincial Action Network of the Status of Women in Newfoundland and Labrador, please accept this submission as part of the Interdepartmental Working Committee on Pay Equity and Transparency's consultations on the regulations for [Bill 3 An Act Respecting Pay Equity for the Public Sector and Pay Transparency for the Public and Private Sectors](#). Since our members have participated in both in-person and virtual consultation sessions over the last month, we are now sharing a collective submission on behalf of Status of Women Councils across the province.

Regretfully, this late-stage consultation process occurred after Bill 3 received Royal Assent, without the opportunity to consult on the legislative drafting itself. Consultations on regulations alone are not enough to address the gaps in Bill 3 as it stands. With that said, we submit that Bill 3 be re-drafted to better serve women and marginalized workers in Newfoundland and Labrador.

In solidarity with the recent report from the Newfoundland and Labrador Federation of Labour, [Newfoundland and Labrador Needs an Equality Reset](#), this submission recommends a reset and re-write of Bill 3. In support of this report's ten amendments, we emphasize in particular the following recommendations for re-drafting Bill 3:

- Pay Equity and Pay Transparency must be enshrined as fundamental human rights explicitly in the legislation itself.
- Pay Equity and Pay Transparency legislation must apply to both the public and private sectors in their entirety. This should not be enacted in a delayed, stepped model as it is written currently in Bill 3.
- Pay Equity and Pay Transparency must both apply to women-dominated workplaces, following the Federal Task Force's "proxy" method.
- Exemptions for contract workers should be removed from the legislation to ensure protections for precarious workers.
- To be effective, this legislation requires support and monitoring mechanisms through an independent oversight agency. This cannot be reasonably conducted through a singular, appointed Pay Equity Officer.

In summary, we submit that the legislation be redrafted and that Unions, both labour and feminist organizations are included in this process. Our current Pay Equity and Pay Transparency legislation is not "[a piece of progressive legislation that we can all be proud of](#)" - but it could be, if re-drafted in a consultative manner.

Re-writing Bill 3 is the only way to uphold pay equity as a fundamental human right in Canada, and to ensure that legislation in Newfoundland and Labrador is truly proactive, effective and wide reaching. In our shared efforts and commitment to social and economic gender equity, we hope this submission is considered carefully.

Sincerely,

Provincial Action Network on the Status of Women