



Tel: 902 368 4510
<http://www.peistatusofwomen.ca>
info@peistatusofwomen.ca

Advisory Council on the
Status of Women

PO Box 2000
Charlottetown
Prince Edward Island
Canada C1A 7N8

SUBMISSION FROM THE PEI ADVISORY COUNCIL ON THE STATUS OF WOMEN :
The Temporary Foreign Worker Protection Act Employer Registry
and Administrative Penalties Consultation

July 17, 2025

The Prince Edward Island Advisory Council on the Status of Women (PEIACSW) is a nine-member, government-appointed arms-length government agency with a mandate to advise government and educate the public on matters that relate to the status of Prince Edward Island women.

The PEI Advisory Council on the Status of Women acknowledges all women-identifying people in our understanding of “women,” including cis women, trans women, and gender minorities.

We acknowledge that the work of the PEI Advisory Council on the Status of Women takes place on the island district of Epekwitk in Mi’kma’ki, the traditional territory of the Mi’kmaq and their home today and since time immemorial. Epekwitk is covered by the historic treaties of Peace and Friendship.

The PEI Advisory Council on the Status of Women is pleased to make the following submission to the Temporary Foreign Worker Protection Act Employer Registry and Administrative Penalties Consultation. In addition to the following recommendations, the council is aligned with the PEI Migrant Workers Action Team and supports their recommendations and the research and relationships on which they are based.

All those employed through the temporary foreign worker program risk facing a range of vulnerabilities and challenges. As such, we see no reason for any exemptions from registration for any particular sector or for any particular types of hires. In particular, we expect employers in agriculture, health care and caring work, fisheries and seafood processing, and sales and services to be required to register.

As part of the registration process, the names of any in-house recruiters should be provided. In order to ensure all appropriate in-house recruiter information is provided, a clear and consistent definition of what is meant by in-house recruiters must be outlined.

We recommend that after initial registration, employers be required to renew their registration annually, at which time they should be required to update and provide additional information. Additional information should include updated numbers of temporary foreign workers employed, copies of work contracts for all temporary foreign workers, and rental leases when housing is provided by the employer.

Regular proactive inspections should take place to ensure employers continue to be in compliance with the act. These inspections should include conversations with temporary foreign workers, and all efforts to ensure these conversations are safe and confidential must be made. Staffing within the department must be increased to effectively enact these regular inspections, with all those conducting inspections being properly trained.

Administrative penalties should be implemented in cases where non-compliance persists. These penalties should be sufficient to deter non-compliance and increase based on the frequency and severity of the violations. Additionally, the ability for employer licenses to be suspended or revoked should also be considered. Should an employer temporarily or permanently lose their license, all efforts should be made to support any temporary foreign workers impacted. Possible measures to support these workers include ensuring records of employment (ROEs) are accurately completed and submitted by the employer to ensure access to Employment Insurance (EI), and writing letters of support to the Federal Government to issue open work permits for impacted workers.

The employer registry and a list of all employers found to be in non-compliance must be made publicly available online. All publicly available information should be easily accessible and free to access. Similar to other Provinces, such as BC, the province should work with the Federal government to ensure employers are registered with the Province before any Labour Market Impact Assessments (LMIAs) are issued.

We thank you for the opportunity to provide this submission. Please let us know if you have any questions or require further information.

Sincerely,



Hsiao Yu Kate Liu , Chair of the PEI Advisory Council on the Status of Women

cc: Hon. Jenn Redmond, Minister Responsible for the Status of Women
Michelle Harris-Genge, Director of the PEI Interministerial Women's Secretariat
Members and staff of the PEI Advisory Council on the Status of Women