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Executive Director, Labour Policy & Legislation
Ministry of Labour
Box 9594 Stn Prov Govt
Victoria, B.C.
V8W 9R1

August 15, 2025

Re: TIABC Submission on Extended Leave Period

On behalf of the Tourism Industry Association of BC (TIABC), I am pleased to provide information and recommendations on the Ministry of Labour's formal consultation process on the implementation of a 27-week job-protected medical/illness leave that works for B.C.'s tourism economy.

Background

The Tourism Industry Association of BC (TIABC) supports the principle of extending job-protected leave for employees with serious illness or injury to 27 weeks to align with federal EI sickness benefits and other jurisdictions. This change fills a gap in BC's Employment Standards Act and supports workers facing significant health challenges. Ontario brought a comparable 27-week long-term illness leave into force for all employers on June 19, 2025, offering a clear precedent for simple, predictable rollout.

Given the unique characteristics of BC's tourism sector (high seasonality, reliance on seasonal and small-business employers), we respectfully request the Ministry include the recommended measures to ensure practical, workable implementation and to limit unintended harm to operators and employees. Employers need clarity on documentation, continuous service across seasons, and reinstatement when roles are seasonal or casual so workers are protected, and businesses can plan coverage without undue disruption.

TIABC supports the Province's direction to reduce health-system burden by limiting sick notes for short-term absences. Our recommendations here focus on long-term, job-protected leave only. We ask the Ministry to make plain in regulation and guidance that the 27-week leave can require reasonably sufficient medical certification (e.g., from a physician or nurse practitioner), while Bill 11's "no-sick-note for short-term absences" remains intact. This prevents misapplication of Bill 11 to extended leaves and gives small seasonal employers predictable tools for planning coverage.

Context – Seasonal Workers

As employee replacements must often hold regulated certifications and live on-site in remote seasonal settings, we recommend time-limited backfill or placement supports, potential housing, and travel offsets to seasonal tourism operations.

In the case of bear-viewing lodges for example which typically operate from May–October, guides need wildlife-specific training (e.g., Commercial Bear Viewing Association levels, wilderness first aid). If a certified lead guide takes extended leave, a replacement must meet those standards before guiding guests, which can't be done overnight. A small onetime backfill stipend for seasonal lodges would help.

For golf courses and winter mountain resort operations, seasonal greens or lift maintenance teams are small; pulling one certified mechanic into long-term leave pushes mandated safety checks onto overtime. Return to work coaching and a shared regional staffing pool (potentially in partnership with go2HR/WorkBC) could reduce downtime.

Recommendations

1) Clear and predictable timing

- Primary ask: Set one province-wide in-force launch date preceded by a 6–12 month transition focused on education, templates, and compliance support.
- Seasonality alignment clause: If an employer’s operating season starts within 90 days of the in-force date, allow compliance to begin on the first day of that operating season to avoid mid-season policy changes.
- 24-month review: Commit to a formal review (with sectoral data) to assess impacts on seasonal operations and make evidence-based adjustments.

2) Clear medical documentation rules for long-term leave

- For the 27-week leave only, clarify reasonably sufficient proof includes medical certifications from physicians or nurse practitioners.
- Explain how this interacts with Bill 11 (short-term sick-note restrictions), so employers don’t mistakenly apply “no-note” rules to extended leaves.¹

3) Seasonal operations guidance

- Continuous service across seasons: When an employee returns to the same employer within 12 months, count their prior seasonal time as continuous service for eligibility and recall.
- Reinstatement for seasonal or casual roles: If the identical job isn’t operating off-season, give the worker first right of recall to the same role on the next season’s opening. The employer may offer a comparable job in the interim if available (similar duties, skill level, and pay band).
- Fixed-term seasonal contracts: Once the service threshold is met, fixed-term seasonal employees would be eligible for the 27-week leave. If the term ends during leave, allow return before season end if feasible, or recall at next season start where the position resumes.

4) Implementation toolkit for small and remote employers

- Publish a sector-ready toolkit in partnership with WorkSafeBC: model policies, employer FAQs, return-to-work checklists, and sample staff communications, aligned with the seasonality and pronounced variability of the hospitality and tourism industry.

¹ [Bill | Legislative Assembly of BC](#)

5) Targeted transition supports

- Consider temporary staffing placement subsidy support for peak periods, or one-time transition funding/tax credits to offset backfill and onboarding costs for small operators in rural and remote communities.

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