



March 18<sup>th</sup>, 2017

Hon. Christina Gray  
Minister of Labour  
Government of Alberta  
107 Legislature Building  
Edmonton, AB T5K 2B6

**RE: Employment Standards Code Review Feedback**

Dear Minister Gray,

The Alberta Liquor Store Association (ALSA) represents over 1,400 liquor retailers across 350 communities the Province. Over 65% of liquor stores are small mom and pop family owned and operated businesses. The liquor industry is responsible for hiring over 12,000 Albertans while contributing to the economy in the communities in which we live.

ALSA had the opportunity to participate in the *Employment Standards Code Review Session* on April 3<sup>rd</sup>, which provided for a very brief discussion on a list of important issues. The issues being discussed are indeed very important and as such we would like to share some further feedback from our members.

**Current Situation**

Small liquor store owners are currently under pressure from several economic factors: A recessing economy, low oil prices, increased costs via carbon tax, people leaving for other Provinces to find work and the increase in minimum wage within a short period of time.

Many small businesses in Alberta are hanging on due to the current economic pressures, seeing their profit margins decline on a monthly basis. Some stores report experiencing 10% -20% reduction in sales. Any additional costs or legislation could make the situation much worse and force family owned business out of business or forcing them to eliminate jobs.

**Family/Work Balance**

The focus on family and work balance is something our members feel is important to provide employees and strive to offer flexibility in schedules to retain good employees.

However, one must not forget the family and work balance for the owners of small business and family operated business. Many mom and pop stores have family members that operate the stores and while they provide flexibility to their employees to attend family events, owners themselves will not be able to benefit from these activities as they would have to close the store in order to do so.

If legislation drastically increases the number of job protected leaves and paid leaves, it will result in businesses hiring more part time and contract positions as they cannot afford the cumulative increase in costs.



### **Earned Sick Leave**

ALSA and its members provide flexible schedules to accommodate employees who are sick by adjusting the work schedule as needed to give them the time they need to recuperate. If sick leave is legislated, it could result in abuse of these days which may not be used for the purpose intended. If legislation does go through, we would recommend mandatory doctor's note to avoid misuse of sick days.

### **Maternity, Parental, and Compassionate Care Leaves, Unpaid, Job-Protected Leaves for Family Responsibilities or Personal Emergencies**

ALSA recommends a minimum of 90 days qualification/probationary period before employees can take these leaves. Government must also provide clear definitions of what qualifies the employee for the leave, the length of time permitted, and supporting documentation required.

### **Consultation Timeline**

As mentioned many small liquor stores have limited staff and have owners operating the business. As such, the five week consultation timeline has not allowed for meaningful consultation or discussion with our members. Many stores have asked for more time to complete financial assessments on the impact on these proposed changes, so they can better ascertain how they will be affected.

ALSA appreciates the opportunity to provide further feedback on the Employment Standards Code Review. Our Association and our members believe in supporting the communities in which we live and work and strive to provide jobs that allow Albertans to raise their families.

We recognize the Government's efforts in updating the employment standards in Alberta, however would request for a longer period of consultation and implementation phase of these changes. With our current economic situation and financial pressures on liquor stores, a reprieve in more changes and regulations would be welcomed. We want to make sure our members can get back on their feet so they can once again contribute to Alberta's economy at full capacity.

Best regards,

A handwritten signature in black ink, appearing to read 'Ivonne Martinez'.

Ivonne Martinez  
President