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Living Water Resorts

Submission

**“Preventing the Looming LMIA Pandemic:
A Policy Proposal to Preserve Jobs within Canada’s Tourism Industry
through the Continued Employment of Temporary Foreign Workers”**

to the

**House of Commons
Standing Committee on Citizenship and Immigration**

March 27, 2021



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Members of the Standing Committee on Citizenship and Immigration
Ottawa, Ontario

March 26, 2021

**Preventing an LMIA Pandemic: Living Water Resorts Submission
re Temporary Foreign Workers and LMIA Restrictions**

Dear Committee Members:

Thank you for the opportunity to share our concerns about restrictions imposed on the hiring of Temporary Foreign Workers via the Labour Market Impact Assessment (LMIA).

This Government's 2020 policy change poses a looming LMIA pandemic for my resort and the Canadian resort industry. This change will unnecessarily prolong our industry's recovery from the ravages of COVID we experienced during the past year.

I am the owner of Living Water Resorts, located in Collingwood, Ontario. Our resort is the Town's largest employer and during peak season we employ 500+ people at the resort.

I have owned the resort for 29 years. During those years the resort has grown significantly. Today, we offer 700+ acres of fresh experiences for our guests: the fairways of our Cranberry Golf Course, exploring Georgian Bay from our marina, re-energizing at our Living Shore Spa, dining at our Lakeside Seafood & Grill – Collingwood's only waterfront dining experience or celebrating a wedding at our waterfront Bear Estate.

Last year's change in the LMIA Ministerial Instructions requires that all Canadian Accommodations industry properties, including Living Water Resorts, must reside within a region with unemployment of less than 6% in order to hire Temporary Foreign Workers. Living Water Resort resides within a region of 7.5% unemployment. Effectively, this means we cannot hire Temporary Foreign Workers.

At this time of year, we typically begin our search for local Canadian workers and Temporary Foreign Workers to fill the required entry-level positions at the resort. This spring we need to hire 40 Temporary Foreign Workers and continue employing 14 Temporary Foreign Workers.

That is an excruciating problem as we are unable to attract local Canadian workers to entry-level positions as room attendants despite our caring labour practices. This has been challenging for our industry as well as the Agricultural industry for many years.



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The hiring of Temporary Foreign Workers in past years has enabled our resort and other resorts across Canada to operate. Without Temporary Foreign Workers, we cannot maintain our guest rooms and keep the hotels clean.

This change in LMIA Ministerial Instructions will, without any doubt, lead to job loss for local Canadian workers and not employ local workers as intended.

This is a flawed policy change that needs to be adjusted ... immediately.

In this briefing document, we provide a simple adjustment to the Ministerial Instructions that will allow Living Water Resorts, and all Canadian Accommodation resorts, to avoid an LMIA pandemic. The change we propose will allow for us to continue employing Temporary Foreign Workers thereby ensuring the continued operations of the resorts.

No Temporary Foreign Workers, no clean hotel rooms, no hotel rooms open, close the hotel, layoff staff. Suffer the many consequences.

It's that simple and it applies to any resort in Canada that relies on Temporary Foreign Workers.

We are encouraged by Minister Qualtrough's assurance that this policy can be changed: *"The Department continues to monitor the labour market situation across all regions and will consider policy adjustment as the situation evolves and the evidence warrants."*

To use Minister Qualtrough's words, the situation has evolved and the evidence does warrant a change.

We encourage you to read the submission and recognize the effectiveness of the solution we propose. We are hopeful that following your review you will recommend the change in Ministerial Instructions that we have proposed and are endorsed by major resort industry associations.

Members of the Committee, we thank you for your consideration.

Yours sincerely,



Larry Law
CEO & Founder
Living Waters Resorts

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Executive Summary

Living Water Resorts of Collingwood, Ontario and Canada's resort industry are facing a looming pandemic crisis created by our Government's 2020 changes in the Local Market Impact Assessment (LMIA) used to admit Temporary Foreign Workers (TFW) to Canada.

All of our resort's efforts over the past 12 months to counter COVID's devastation are jeopardized by this looming LMIA pandemic.

- Living Water Resorts, is a four-season resort comprised of two resort hotels (445 rooms), an award-winning Spa and Restaurants (3), wedding/meeting venues and a golf course.
- The resort has hired new Temporary Foreign Workers (TFW's) each year as room attendants and custodians at the resort: this year the resort needs 40 TFW's to join 14 at the resort
- The 2020 change in LMIA criteria prevent the hiring of Temporary Foreign Workers.
- The policy change was based on a flawed assumption as stated by Minister Qualtrough:
 - ***"... In places where the unemployment rate is high, it is expected that employers will have less difficulty in filling these positions ..."***
- That assumption is deeply flawed, erroneous and results in results contrary to its intention
- We are forced to rely upon the hiring of local Canadian workers who do not want to work in the entry-level positions
- Without these workers, our resort has no option but to close 160 rooms and layoff 100+ workers (local Canadian workers) and lose \$32,000 revenue per night
- In addition, we have completed the construction of a \$50 million addition comprised of 86 suites in our Living Water Resort waterfront hotel that require 20 workers to clean rooms
- The addition was launched before the 2020 Ministerial Instructions preventing our hiring of Temporary Foreign Workers
- This addition would not have broken ground with those Ministerial Instructions in place
- The success of this expansion is threatened by the LMIA pandemic
- In the upcoming summer season when Canadians are looking for safe travel alternatives following 12 months of complying with stay-at-home orders, Living Water Resorts will not be able to provide guests with rooms.
- Rather than providing a safe, healthy resort experience we'll be advising our guests to continue staying at home as the change by Government policy forces us to close rooms
- The LMIA pandemic will spread to the local community as diminished tourism – 117,900 fewer tourists per year – will see reduced tourism spending in local shops, restaurants and other services. This, in turn, will drive a greater dependence on Government financial support and an unnecessary and prolonged recovery from COVID.
- **In the end, the well-meaning intentions to preserve jobs for local Canadian workers by not admitting TFW's causes the unemployment of local Canadian workers.**

2) About Living Water Resorts

Living Water Resorts is located in Collingwood, Ontario. The four-season resort is comprised of two resort hotels (445 rooms), Spa, Restaurants (3), wedding/meeting venues and a golf course.

The resort was purchased out of bankruptcy proceedings 30 years ago by Larry Law, CEO and Founder. It continues to be a privately owned resort that has grown substantially. Today, it employs 500+ full-time and part-time staff members when operating at full capacity compared with 20 staff members 30 years ago. The resort has added a new hotel, award-winning Spa, the award-winning Lakeside Seafood and Grill, and a banquet/conference facility both of which are Collingwood's only waterfront locations.

Larry Law is widely recognized as a responsible businessman who serves his staff, resort visitors and local community with a caring heart.

Evidence of our resort's commitment to caring is widely known.

Following the pandemic's emergence when our resort was completely closed, Collingwood Mayor Brian Saunderson asked Mr. Law to serve on the Town of Collingwood's Economic Support & Recovery Task Force to provide leadership to deal with the impact of COVID-19. Irrespective of the constant pressures of empty rooms and our bankers, he gladly accepted this opportunity to serve our Town and help to identify a way forward for local businesses.

In 2019, the resort was humbled to receive Tourism Canada's Distinguished HR Service Award for its caring support of its Mexican temporary workers who were the victims of human trafficking. A conversation with one of the Mexican workers following our positive intervention personally confirmed Living Water Resorts commitment to be a caring resort. He told Mr. Law, *"I went to sleep as a slave and woke up as a free man"*.

More recently, Mr. Law received the Order of Collingwood and the Rotarian of the Year awards reflecting the contribution by Living Water Resorts to our communities. Our caring team at Living Water Resorts never allows an opportunity to care and contribute to pass.

During the 12 months of the pandemic, Living Water Resorts implemented support programs for 300+ laid-off staff when both resort hotels, restaurants and spa were closed until the early summer.

After 30 years of growing our resort, creating jobs, contributing to the local community and providing 700 acres of fresh spaces for our guests to enjoy, we are highly concerned with any threat that comprises our ability to continue caring for all.

The pandemic wreaked financial and emotional duress on our team. Nevertheless, with resilient guest demand and Government support, we did achieve a modest recovery before the January provincial lockdown.

3) Past Efforts to Hire Local Canadian Workers

Before 2020, Living Water Resorts regularly hired Temporary Foreign Workers in compliance with the requirements of the Local market Impact Assessment.

We typically hire 20+ new Temporary Foreign Workers each spring to have sufficient time for training before the busy summer season. These 20+ workers join a number of other TFW's who remain at the resort from the previous year's hiring. Approximately 35 TFW's in total.

The hiring process via a trained outside expert in this field begins with the payment of \$1,000 per individual Application Government Processing fee. A \$30,000 expense plus the expense of using the external agent.

Our preference would be to hire local Canadian workers and avoid these fees and expenses.

In our 2019 applications *Reason for LMIA Applications* we cited reasons for our need to hire TFW's:

- "We cannot find enough cleaners/room attendants locally"
- "We are experiencing a labour shortage for room attendants. We need attendants to clean and maintain hotel rooms to sell the 353 [now 445 rooms] rooms throughout the year."
- "Short-staffed in-room attendants are impacting our operations as the quality of the service we provide do not meet our guest and company expectations. With the support of room attendants, we can maintain competitive in the market."

In response to the "*Benefits to the Canadian labour market*" we stated:

- Filling a labour shortage to provide better services to meet our guest and company expectations;
- Better service will attract and retain more guests and thus increase tourism dollars for the company and in the local economy
- Consequently, create more job opportunities

We affirmed in the application, the hiring of Temporary Foreign Workers will NOT lead to job losses or a reduction in work hours now or in the foreseeable future for Canadian permanent resident employees or the Canadian workforce

We offer local Canadian workers:

- \$14.55 to \$16.00 per hour
- 37.5 hours per week, 7.5 hours per day
- Shifts 8 am to 4 pm, 9 am 5 pm or 10 am to 6 pm
- Monday to Sunday
- 10 days vacation
- Dental Insurance, Extended Medical Insurance

- Discounts for meals, resort amenities
- Employee events including Thanksgiving Dinner, Easter luncheon & Christmas party (adult and children), Family BBQ
- Pastoral services for personal development
- Free use of pools, gyms
- Staff accommodation within walking distance @ \$350 per month
- A fun and caring company

We have tried without success to attract local Canadian workers with:

- Web and print advertising
- Posting on job boards, social media
- Hosting job fairs (See Appendix)
- Offering incentive referrals

The result of our 2019 local hiring initiatives for 20+ entry-level positions is particularly insightful:

- Only 23 Canadian/permanent residents applied compare to our target of 100+
- 9 were not interviewed because they did not show for an interview or took a job elsewhere
- 14 interviewed
- 9 offered a position
- 6 Canadian/permanent residents declined the LWR job offer
- 3 Canadian/permanent residents were hired (13% Hired/Application ratio)

Room cleaning is essential safety for our guests. The safe operation of the Living Water resort hotels requires substantially more than 3 new workers.

That is why we must rely on employing Temporary Foreign Workers.

4) The 2020 Change in LMIA Ministerial Instructions

Following the 2020 COVID outbreak, changes were introduced to Temporary Foreign Worker hiring practices to prioritize the employment of local Canadian workers.

This policy change to the LMIA process, executed by Ministerial Instructions (see below), was based on a specific assumption communicated by Minister Qualtrough to our CEO Larry Law:

- ***“...In places where the unemployment rate is high, it is expected that employers will have less difficulty in filling these positions ...”*** with local Canadian workers.

The change was intended to ensure, in the words of Minister Qualtrough, that *“Canadians and permanent residents are considered first by employers”* by introducing a 6% unemployment threshold that stops the hiring of any TFW’s in any region in Canada.

Collingwood’s unemployment rate as determined by Statistics Canada is currently 7.5%, exceeding the 6% threshold in the 2020 Ministerial Instructions.

The result for any resort hotel in our region, according to Ministerial Instructions, for Low-wage positions in Accommodation and Food Services and Retail Trade sectors, is:

“We [LMIA review] will refuse to process your LMIA application”.

2020 Ministerial Instructions

“As a result of public policy considerations as determined in Ministerial instructions, we may refuse to process your Labour Market Impact Assessment application for:

- Certain [positions in the accommodation and food services and retail trade sectors](#)

Positions in Accommodation and Food Services and Retail Trade sectors:

- In an [economic region with an unemployment rate](#) of 6% or higher (as defined by the Program-specific Statistics Canada data used by Service Canada for the purposes of the Temporary Foreign Worker Program)
- In the [Accommodation and food services sector](#) (North American Industry Classification System (NAICS) code 72) or [Retail trades sector](#) (NAICS codes 44 to 45);
- and classified under the National Occupational Classification (NOC) codes 6541, 6611, 6622, 6711, 6721, 6731, 6732, 6733, 7611 and 8612

We will refuse to process your LMIA application when all three conditions apply.

Note: Due to the serious economic impacts resulting from Covid-19, all economic regions in Canada are now considered to have unemployment rates of at least 6% or above.”

LWR Note: All three conditions apply to Living Water Resorts and other resort operators

5) 2021 Challenge to Operation: A Local Canadian Worker Predicament

Today, we are operating in an Ontario Red Zone with one hotel fully open, one closed and limited amenities open. However, we are seeing increasing inquiries and reservations for summer visits. That is vital as summer is critical to our success and future ability to operate.

We plan to reopen the currently closed hotel, our other two restaurants and our Spa at full safe capacity for the summer season. Of course, those plans are subject to Provincial guidelines.

Despite this sunny optimism, an ominous dark cloud looms on the horizon.

The dark cloud that threatens our recovery from the ravages of COVID and our future success is the 2020 COVID-driven policy change in Ministerial Instructions regarding the application of the Labour Market Impact Assessment (LMIA) as outlined on page 6.

Regrettably, the policy change does the opposite of what it intended: it drives unemployment.

The well-meaning policy objective to employ Canadians by ensuring they would be first in line to accept jobs is based upon the flawed notion that Canadians want those jobs.

Unfortunately, this policy assumption while laudatory, is terribly, terribly ill-suited in our context and the context of entry-level jobs in the resort industry.

As we know from several years of trying to hire sufficient numbers of Canadian workers, Canadians do not wish to work at entry-level room attendant positions and custodial positions that we and members of the resort industry need to fill.

Here is a simple explanation of the flawed policy change.

- Living Water Resorts, like many Canadian resorts, needs Temporary Foreign Workers to perform necessary housekeeping, cleaning and sanitizing functions.
- TFW's provide cleaning services for our two hotels and their combined 445 rooms.
- Despite rigorous, extensive hiring efforts, for several years we find ourselves unable to attract enough local Canadian workers

Over the past six months, we have communicated on numerous occasions about this flawed policy change to the Prime Minister, Minister Qualtrough, Minister Mendicino, Minister Ng, member of the Standing Committee, backbenchers who represent tourism resort constituencies, MP Shaun Chen, Premier Doug Ford and Collingwood Mayor Brian Saunderson and our local MP Terry Dowdall.

Our consistent message is that the Accommodation and Food Services and Retail Trade sectors 6% threshold for LMIA approval simply does not work for Living Water Resorts and the Canadian resort industry.

6) The Economics of the Looming LMIA Pandemic

The 2020 change in Ministerial Instructions creates a looming “LMIA Pandemic”. Introduced in early 2020, this change was not under scrutiny during 2020 when the tourism industry closed many beds to visitors.

However, at this time when there is optimism as we look toward the summer season, the LMIA pandemic poses a real threat to the industry’s recovery.

The widespread certainty of business losses, unemployment of local Canadian workers and increased reliance on government support programs.

In 2021 Living Water Resorts needs 40 TFW’s to join our workforce and the 14 TFW’s currently at Living Water to clean and maintain 216 rooms (4 rooms to one worker ratio)

Impact of Living Water Resorts and Other Canadian Resorts

The closing of 216 rooms will cause:

- An estimated \$43,000 per night revenue loss to Living Water Resorts (conservatively based on an average of \$200 per night).
- Equivalent to an annual \$15,550,000 revenue loss.
- The direct layoff – 100+ in the resort operations team.
- The collateral damage of indirect layoff in our Spa, three restaurants, and other amenities

Living Water Resorts serves as a proxy for any resort property across Canada that relies on Temporary Foreign Workers to supplement its workers to operate.

Living Water Resorts is merely the “canary in the coal mine” as a harbinger of the potential LMIA Pandemic.

Impact on the Town of Collingwood

Besides the above, the repercussions for our local economy, which is barely recovering from COVID, would be brutal:

- 117,900 fewer nightly tourists in Collingwood on an annualized basis
- Fewer visitors will result in dramatically reduced retail and dining spending we prudently estimate at \$11,790,000 (\$100 per day per visitor)
- Layoffs at neighbouring retail, dining and other services
- Increased dependence upon Government financial support
 - Unnecessarily prolonged recovery from COVID

7) Living Water Resort Proposed Solution

Living Water Resorts is proposing a simple change in the 2020 Ministerial Instructions that establish the criteria for admission of Temporary Foreign Workers via the LMIA review process.

This proposed change is specific to entry-level Accommodation and food services sector jobs. Further, this proposal is specific to identified geographic regions in which resort operators are unable to hire local Canadian workers.

This change is a win-win for:

- Living Water Resorts and other resort enabling them to remain open at 100% open capacity
- Resort staff remaining employed
- Our local community: retailers, restaurants, spas, Collingwood main street
- Visitors who want to escape their small condos for a safe destination vacation
- A win for Temporary Foreign Workers currently working at Living Water Resorts and other resort properties (continued employment)

Our proposal is targeted, measurable, and efficient.

Our proposed solution is the addition of a few words to existing Ministerial Instructions. The yellow highlighted text is the resort industry's preferred solution to preventing an LMIA pandemic.

- in an economic region with an unemployment rate of 6% or higher (as defined by the Program-specific Statistics Canada data used by Service Canada for the purposes of the Temporary Foreign Worker Program) excepting the Accommodation and Food Services trade sectors in specific tourism regions as determined by Ministerial instructions (including Collingwood, the Blue Mountains, Niagara ...etc)

Unlike the “priority” exemptions provided by the Government to Agriculture and Agri-Food-Industry from the application of the 6% unemployment threshold, this solution is targeted and limited to specific local regions experiencing difficulties hiring entry-level positions.

This text addition does not fast-track or ignore LMIA application admission requirements.

The proposed change merely opens a window of opportunity that is currently closed for Temporary Foreign Workers who wish to work in Canada in the Accommodation and Food Services Industry.

All new applicants will be subject to the full application review that is currently in place.

Temporary Foreign Applicants must comply with all other admission criteria.

8) Conclusion

Here is the roadmap of an LMIA Pandemic:

No local workers to clean rooms.

No Temporary Foreign Workers to clean rooms.

No clean rooms are available for guests.

Close those rooms.

Layoff hotel room staff.

Layoff other hotel staff – local Canadian Workers.

Close the hotel.

Severe financial losses for hotel operators.

Bankruptcies in Canada's resort industry

Reduced spending in the local community by reduced tourism and laid off hotel workers.

Layoffs at local businesses.

Increased need for Government support payments to the unemployed.

An unnecessary stalled recovery from COVID.

It's that simple and it's not unique to Living Water Resort.

How to avoid the looming LMIA pandemic?

Adopt the targeted Living Water Resorts proposal to provide specific exemptions for specific regions in which Accommodation and food services employers prove they are unable to hire local Canadian workers for the entry-level positions.

9) Appendix

a. Resorts of Ontario

b. Ontario Hotel Restaurant & Motel Association

March 19, 2021

Honourable Minister Carla Qualtrough
Minister of Employment, Workforce Development & Disability Inclusion
House of Commons
Ottawa, Ontario Canada
K1A 0A6

Dear Minister Qualtrough:

Re: Temporary Foreign Worker Challenges – Solution for LMIA admission process

Resorts of Ontario is a provincial organization which represents, serves and promotes the Resort, Lodges, Cottages and Inns, located throughout the province across rural Ontario. These SME businesses are the lifeblood of our rural Province, responsible for generating significant tax receipts and jobs.

We are writing to you today to express concern about the drawbacks of the LMIA admission process and the vital importance of introducing measures to help resorts in Ontario be more successful and surmount workforce challenges. We wish to add our voice to support Living Water Resorts' proposed policy adjustment which would allow LMIA applications for temporary foreign workers in rural resort regions that exceed 6% unemployment, by expanding script on "Positions in Accommodation and Food Services and Retail Trade Sectors" to incorporate "**resort businesses in tourism regions throughout Ontario**".

For the resort sector, employers of Accommodation and Food Services industry have not been very successful in hiring Canadians for entry level positions. This has been a historic and ongoing challenge for our sector throughout rural Ontario. The proposed amendment would remove the barrier we are presently faced with and facilitate our stakeholders' ability to surmount historical workforce challenges, while protecting Canadian jobs.

We believe that this direction will preserve Canadian jobs, help Ontario and Canadian businesses thrive throughout rural resort communities and drive economic growth.

Sincerely,

Grace

Grace Sammut Managing Director Resorts of Ontario
GS/mkd

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March 16, 2021

To Honourable Minister Carla Qualtrough
Minister of Employment, Workforce Development and Disability Inclusion
House of Commons
Ottawa, Ontario, Canada
K1A 0A6

cc. Honourable Marco E. L. Mendicino
Minister of Immigration, Refugees and Citizenship

Re: Workforce Issues – LMIA Recommendation

Dear Minister Qualtrough,

I am writing to you on behalf of the Ontario Restaurant Hotel & Motel Association (ORHMA). Dating back to the 1920's, ORHMA is the largest not-for-profit provincial hospitality association, representing over 11,000 establishments across Ontario. ORHMA is dedicated to fostering a positive business climate for the hospitality industry and represent the industry's interest at all levels of government.

Prior to the COVID-19 pandemic, workforce availability and development were the number one industry issues experienced by operators irrelevant if located in urban, suburban or resort seasonal settings. The need to fill positions were forcing many hospitality operators to freeze investment while experiencing operational challenges affecting service and employee morale.

Even though current unemployment data is showing thousands of workers not yet re-employed, finding workers in some parts of Ontario is very challenging. COVID-19 has amplified this issue and has made it more critical especially in seasonal destinations.

Realizing the complexity of the Temporary Foreign Worker rules, we are supporting one simple suggestion in making amendments to the Labour Market Impact Assessment (LMIA) approval requirements.

The suggestion comes from one of our accommodation members, Living Waters Resort located in Collingwood, which can be found below. This recommendation calls for a text addition to the official government policy statement as highlighted in the attached proposal and noted as follows:

Positions in Accommodation and Food Services and Retail Trade sectors:

*In an economic region with an unemployment rate of 6% or higher (as defined by the Program-specific Statistics Canada data used by Service Canada for the purposes of the Temporary Foreign Worker Program) **excepting the Accommodation and Food Services trade sectors in specific tourism regions as determined by Ministerial instructions (including Collingwood, the Blue Mountains, Niagara ...)***

The inclusion in the yellow highlighted text would render the blue highlighted "refuse" statement null and void. Additional tourism regions can be added as determined.

This simple targeted change offers a fair response to a troubling issue in parts of Ontario and anywhere else the issue is experienced without comprising other regions. A Ministerial directive would add changes as needed.

Thank you,



Tony Elenis
President & CEO

A Simple Proposal to Unblock the LMIA Logjam for the Tourism Industry

One suggestion to “keep it simple” that would enable LMIA approval for TFW’s in regions that exceed 6% unemployment but are unable to find local Canadians to perform the role.

Make one simple text addition to the official government policy statement as illustrated in yellow below.

The inclusion of the yellow highlighted text (or some variant) highlighted in yellow would render the blue highlighted “refuse” statement null and void. Additional tourism regions can be added as determined.

This would end our problem and the problem for the Canadian Tourism industry. This is a specific, targeted change for tourism regions that need this change. Toronto, for example, likely does not have this problem, Ottawa likely not.

A simple, change for the benefit of the resort industry, workers and government. It would also demonstrate the government’s caring heart for all.

Refusal to process a Labour Market Impact Assessment application

Ministerial instructions

As a result of public policy considerations as determined in Ministerial instructions, we may refuse to process your Labour Market Impact Assessment application for:

- certain [positions in the accommodation and food services and retail trade sectors](#)
- [low-wage positions above the current cap](#)
- [most positions in the province of Alberta](#) (unless they are listed as exempt occupations under the Alberta Refuse to Process or if the application is otherwise exempted)
- [in-home caregiver positions where there is a live-in requirement](#)
- any position if you have had a [Labour Market Impact Assessment revoked](#) in the past 2 years

Certain positions in accommodation and food services and retail trade sectors

Positions in Accommodation and Food Services and Retail Trade sectors:

- in an economic region with an unemployment rate of 6% or higher (as defined by the Program-specific Statistics Canada data used by Service Canada for the purposes of the Temporary Foreign Worker Program) **excepting the Accommodation and Food Services trade sectors in specific tourism regions as determined by Ministerial instructions (including Collingwood, the Blue Mountains, Niagara ...)**
- in the Accommodation and food services sector (North American Industry Classification System (NAICS) code 72) or Retail trades sector (NAICS codes 44 to 45); and
- classified under the National Occupational Classification (NOC) codes 6541, 6611, 6622, 6711, 6721, 6731, 6732, 6733, 7611 and 8612

We will refuse to process your LMIA application when all three conditions apply.

Note:

Due to the serious economic impacts resulting from Covid-19, all economic regions in Canada are now considered to have unemployment rates of at least 6% or above.