

**A feminist and inclusive perspective on
Bill C-50 – *Canadian Sustainable Jobs Act***

BRIEF SUBMITTED JOINTLY BY

**The David Suzuki Foundation, The National Association of
Women and the Law, and Oxfam Canada**

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List of Recommendations

- #1:** Include individuals on the Sustainable Jobs Partnership Council with expertise on women’s rights and economic contributions in the labour market, including expertise on the care economy.
- #2:** Include individuals on the Sustainable Jobs Partnership Council with expertise on the impact of climate change on women, 2SLGBTQ+ people and other vulnerable populations.
- #3:** Require meaningful consultations with women’s rights organizations and advocates, including women’s trade union representatives and women’s committees.
- #4:** Recognize the gendered impacts of the climate crisis and the importance of addressing violence against women.
- #5:** Include representation of migrant worker organizations on the Council.
- #6:** Stipulate that the Government of Canada is committed to seeing all individuals in Canada benefit from and contribute to the building of a net-zero economy.
- #7:** Integrate all ratified ILO Conventions on fundamental principles and rights at work.
- #8:** Expand guiding principles to include rights at work, restriction of pollution from fossil fuels in frontline communities, intergenerational equity, and eradication of poverty.
- #9:** Incorporate principles of sustainable jobs and sustainable development and the right to a healthy environment.
- #10:** Replace the term “economic growth” with “sustainable development” in the legislation.
- # 11:** Include animal agriculture as a key sector that Canada should transition away from, alongside other polluting industries.
- #12:** Strengthen the accountability framework within the legislation by requiring regular engagement with marginalized groups, gender- and sex-disaggregated data collection, and public reporting in an accessible manner.

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Overview

The devastating impacts of the climate crisis on people and the planet are not gender neutral. Yet women's rights and voices are usually left out or disregarded in climate-related policy-making processes, resulting in climate solutions that are inequitable, patriarchal and fail to address women's aspirations and priorities.

It is important that Bill C-50, which is Canada's proposed legislative framework to support the "creation of sustainable jobs for workers and economic growth in a net-zero economy", avoid these pitfalls by ensuring a feminist, intersectional and equitable approach to just transition.

To make Bill C-50 more gender-inclusive, we recommend:

1. Ensuring that **women's work**, including their work in the care economy, is adequately understood and addressed to **reduce gender inequalities** in paid and unpaid work in Canada;
2. Addressing **the gendered impact of the climate crisis** by engaging in meaningful consultations, listening to experts, and recognizing the link between the climate crisis and **violence against women**;
3. Protecting and including **migrant workers**, who are an **important part of Canada's economy**, through a human rights-based approach;
4. Integrating **fundamental principles and rights at work** recognized in ILO (International Labour Organization) conventions ratified by Canada;
5. Aligning the Bill and Canada's just transition with **sustainable development** goals;
6. Ensuring strong **monitoring, transparency, and accountability** in the implementation of Canada's just transition plans.

Introduction: a feminist approach to just transition

The devastating impacts of the climate crisis on people and the planet are not gender neutral. A growing body of evidence, and the Paris Agreement itself, underscore the necessity of a just transition that is gender-responsive, just, and low carbon. Women and girls have less access to resources and, in many contexts, are excluded from virtually all key decision-making processes, including those about the just transition. Women's rights and voices are usually left out or disregarded in climate-related policy-making processes, resulting in climate solutions that are inequitable, patriarchal and fail to address women's aspirations and priorities. It is critical that any legislation or policy frameworks in Canada apply a **gender-lens** to **ensure that women have a seat at the table** and are included in the decent work agenda, that potential negative impacts are known up front and mitigated, and that **Canada is accountable** to workers and diverse equity-seeking populations.

A feminist approach to climate justice is about challenging the economic, social and political systems that have created the climate crisis, and holding countries, companies and individuals accountable for their climate commitments. A just transition must **challenge the structural underpinnings of gender inequality and the economy**, and reconsider how economies are organized, valued, and measured. A just transition must include addressing the inequalities between the global North and South, the legacy of colonialism, and the centrality of care in our

economic systems. A feminist approach is about empowering women and other equity-seeking groups to strengthen their resilience to climate change, while advancing their leadership in shaping solutions and ensuring that climate policies are inclusive and fair. Without a feminist approach, we risk leaving half of Canada's population behind.

In light of those considerations, we make the following six proposals to amend Bill C-50 and make it more gender-inclusive.

1. Women's work and the care economy

Recommendation #1: Include individuals on the Sustainable Jobs Partnership Council with expertise on women's rights and women's economic contributions in the labour market, including expertise on the care economy.

The **relationship between climate change and the care economy** has been largely neglected in climate policy-making. However, climate change stands to exacerbate the existing care crisis both in Canada and globally. The social and economic impacts of COVID-19 have reaffirmed that care work is essential to the functioning of society and is the basis of all subsequent economic activity.

With health being featured as a core COP theme for the very first time at COP28 in Dubai (UAE), it is clear that **climate change is increasingly being recognized as a human health crisis**, and that consequently, it must equally be approached as a care crisis. **Climate change stands to worsen the care crisis** by increasing the total care requirements of society and making providing care more difficult.¹

Care work, whether paid or unpaid, is primarily realized by women, including immigrant women², who face serious pay equity issues, especially in old age. In the context of climate change, it is important to recognize the degree to which **care-related sectors generally have lower GHG emissions, captured in the notion of "care jobs as green jobs"**. Low- or no-emissions job strategies and investments must be included in the just transition, and the bill must include the needs and contributions of women workers.

2. The gendered impact of the climate crisis

Recommendation #2: Include individuals on the Sustainable Jobs Partnership Council with expertise on the impact of climate change on women, 2SLGBTQ+ people and other vulnerable populations.

¹ MacGregor, Sherilyn, Seema Arora-Jonsson, Maeve Cohen, and James Morrissey (eds.). 2022. "Caring in a changing climate: Centering care work in climate action." Oxfam Research Brief. Accessible online at: https://webassets.oxfamamerica.org/media/documents/2022_02_OXF_Caring_in_a_Changing_Climate_FINAL.pdf?_gl=1*1ktklte*_ga*MjEzNzQxOTc4MS4xNzAwMDIxNzQ4*_ga_R58YETD6XK*MTcwMDAyMTc0OC4xLjAuMTcwMDAyMTc0OC42MC4wLjA.

² <https://www150.statcan.gc.ca/n1/pub/75-006-x/2022001/article/00001-eng.htm>

Recommendation #3: Require meaningful consultations with women’s rights organizations and advocates, including women’s trade union representatives and women’s committees.

Recommendation #4: Recognize the gendered impacts of the climate crisis and the importance of addressing violence against women.

Women are disproportionately affected by the climate crisis. Worldwide, 80% of climate migrants are women.³ Women are 14 times more likely to die during a climate disaster.⁴ Indigenous, racialized and disabled women in particular are disproportionately harmed by systems of poverty, making them more vulnerable to the consequences of the climate crisis.

Women also experience an epidemic of gender-based violence, which is aggravated by the climate crisis and extractive industries. Violence against women increases during climate-related disasters, like floods and wildfires, due to increased stress, economic instability and disruptions in infrastructures and services. Moreover, resource extraction projects, sometimes known as “man camps”,⁵ worsen the climate crisis and are linked with increases in gender-based violence. Canada’s just transition must be informed by expertise regarding these gendered impacts of the climate crisis.

3. Migrant workers and workers outside of Canada

Recommendation #5: Include representation of migrant worker organizations on the Sustainable Jobs Partnership Council.

Recommendation #6: Stipulate that the Government of Canada is committed to seeing all individuals in Canada benefit from and contribute to the building of a net-zero economy.

Bill C-50 affirms that “the Government of Canada is committed to seeing **Canadians** benefit from and contribute to the building of a net-zero economy;” and “to collaborating with **Canadian workers**, Indigenous peoples, trade unions, employers, industry, business, communities and provinces and territories, which all have a role to play in building a net-zero economy.” The emphasis on Canadians and Canadian workers leaves out a significant number of individuals that make up Canada’s workforce yet do not possess Canadian citizenship.

Given the critical contributions to the Canadian economy made by temporary foreign workers and permanent residents in Canada, as well as workforces in other countries linked to Canadian-

³ OHCHR, “Climate change exacerbates violence against women and girls” (12 July 2022). Accessible online at: <<https://www.ohchr.org/en/stories/2022/07/climate-change-exacerbates-violence-against-women-and-girls>>.

⁴ UNDP, “Women are hit hardest in disasters, so why are responses too often gender-blind?” (24 March 2022). Accessible online at: <<https://www.undp.org/blog/women-are-hit-hardest-disasters-so-why-are-responses-too-often-gender-blind>>.

⁵ National Inquiry into Missing and Murdered Indigenous Women and Girls, *Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls Volume 1a*, (Canada: The National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019) at 585.

regulated supply chains, it is imperative that the *Canadian Sustainable Jobs Act* take an inclusive, non-discriminatory approach. The Bill should stipulate the Government of Canada’s commitment to seeing **all workers and communities** benefit from the building of a net-zero economy in Canada, and to collaborating with **all workers** in Canada, not exclusively Canadian workers.

4. Fundamental principles and rights at work

Recommendation #7: Integrate all ILO Conventions on fundamental principles and rights at work that Canada has ratified.

Recommendation #8: Expand guiding principles to include (1) rights at work, (2) respect and promotion of the right to a healthy environment, (3) restriction of pollution from fossil fuels in frontline communities, (4) safeguarding of intergenerational equity, and (5) eradication of poverty.

The ILO Guidelines referred to in Bill C-50 emphasize that **just transition policies must respect, promote, and realize fundamental principles and rights at work**. The Bill makes reference to rights at work, without defining what is included under the scope of the term. **It is critical to explicitly incorporate into the preamble of Bill C-50 the ILO Conventions on fundamental principles and rights at work**. In particular, we suggest referring to the **Equal Remuneration Convention** of the ILO, ratified by Canada in 1972, which clearly identifies the obligation for “equal remuneration for men and women workers for work of equal value”, without discrimination.⁶

Additionally, while the guiding principles specify that a sustainable jobs approach should be inclusive and address barriers to employment faced by equity-seeking groups, there is no mention of ensuring that the benefits of decarbonization are shared with underprivileged communities. **The principles outlined are narrow in scope** and do not recognize the need to restrict fossil-fuel pollution in frontline communities, the need to ensure greater job security for all workers affected by global warming and climate change policies, including women and people of diverse gender identities, or the need to safeguard intergenerational equity.

5. Sustainable development

Recommendation #9: Incorporate principles of sustainable jobs, sustainable development and the right to a healthy environment.

Recommendation #10: Replace the term “economic growth” with “sustainable development” in the legislation.

⁶ International Labour Organization, Equal Remuneration Convention, 1951 (No. 100). Accessible online at: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_Ilo_Code:C100

Recommendation #11: Include animal agriculture as a key sector that Canada should transition away from, alongside other polluting industries.

It is important to note that **Bill C-50 does not provide a definition of “sustainable jobs”**. Its focus on economic growth instead of sustainable development and its failure to incorporate in a meaningful way the objective of sustainable development are not in alignment with either the ILO Guidelines or the Paris Agreement.

Without incorporating, in its definitions or guiding principles, the realization of rights at work or sustainable development, the current formulation of Bill C-50 does not provide critical reference points for “sustainable jobs” beyond economic growth.⁷ As a result, the proposed legislation falls short of recognizing “the intrinsic relationship that climate change actions, responses and impacts have with equitable access to sustainable development and eradication of poverty,”⁸ as underscored in the Paris Agreement. **The eradication of poverty is not at all addressed in Bill C-50.** This omission has a disproportionate impact on vulnerable groups who are more likely to experience poverty, including single mothers, trans people, Black and other racialized people, Indigenous people, refugees and recent immigrants.⁹

Additionally, Bill C-50 sets out, in preamble, principles that will guide “Canada’s approach to building a net-zero economy”. It is concerning that the principles enlisted do not include respect and promotion of the **right to a healthy environment**, which the Government of Canada has a duty to protect when administering the *Canadian Environmental Protection Act*, the legislation under which it derives its authority to regulate greenhouse gas emissions.

Finally, sustainable development and just transition must go beyond a single focus on oil and gas and address other industries that disproportionately produce greenhouse gas emissions. Animal agriculture, in particular, has devastating impacts on climate change¹⁰, is a driver of pandemics, and features one of the highest rates of occupational injury and exploitation of marginalized workers.¹¹ Therefore, divesting subsidies from this industry and implementing plans to help farmers transition to plant-based food production could be invaluable in addressing the climate crisis in a feminist and intersectional way.

⁷ On the problems with the economic growth model in the context of planetary boundaries and finite resources, see for example Anders Wijkman & Johan Rockström, *Bankrupting nature: Denying our planetary boundaries* (Routledge, 2013).

⁸ *Paris Agreement, being an Annex to the Report of the Conference of the parties on its twenty-first session, held in parties from 30 November to 13 December 2015--Addendum Part two: Action taken by the Conference of the parties at its twenty-first session*, 12 December 2015, UN Doc FCCC/CP/2015/10/Add.1, 55 ILM 740.

⁹ Census in Brief Disaggregated trends in poverty from the 2021 Census of Population. Census of Population, 2021. Available online at: <https://www12.statcan.gc.ca/census-recensement/2021/as-sa/98-200-x/2021009/98-200-x2021009-eng.pdf>

¹⁰ Oliver Milman, Meat accounts for nearly 60% of all greenhouse gases from food production, study finds, *The Guardian* (13 September 2021). Accessible online at: <https://www.theguardian.com/environment/2021/sep/13/meat-greenhouses-gases-food-production-study>

¹¹ Human Rights Watch, “*When We’re Dead and Buried, Our Bones Will Keep Hurting*” *Workers’ Rights Under Threat in US Meat and Poultry Plants*, Human Rights Watch (2021). Accessible online at: <https://www.hrw.org/report/2019/09/04/when-were-dead-and-buried-our-bones-will-keep-hurting/workers-rights-under-threat>

6. Monitoring, transparency, and accountability

Recommendation #12: Strengthen the accountability framework within the legislation by requiring regular engagement with marginalized groups, gender-disaggregated data collection, and public reporting in an accessible manner.

Strong monitoring, transparency, and accountability is needed. A bold, intersectional, and actionable accountability framework must accompany action plans to ensure impact and action. Local agendas of frontline communities, including feminist grassroots groups and Indigenous peoples, should inform commitments made under the sustainable jobs framework and action plan(s). **Data must be accessible, jargon-free, and disaggregated by gender**, including those identifying as non-binary. Historically excluded groups must be involved in the design and implementation of key actions. Regular reporting and a mechanism for meaningful engagement on said reporting is paramount for transparency and accountability.

Detailed proposed amendments

Proposed additions are in red and bold.

Proposed amendments
<p>Preamble</p> <p>...</p> <p>Whereas the Government of Canada is committed to seeing all individuals in Canada benefit from and contribute to the building of a net-zero economy; [recommendation #6]</p> <p>...</p> <p>Whereas the Government of Canada recognizes and supports the International Labour Organization’s Resolution Concerning Sustainable Development, Decent Work and Green Jobs adopted by the International Labour Conference in June 2013 and the associated guidelines on sustainable economies endorsed by the International Labour Organization’s Governing Body through a decision adopted on November 5, 2015, as well as the International Labour Organization’s Conventions on fundamental principles and rights at work which Canada has ratified, including Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), Right to Organise and Collective Bargaining Convention, 1949 (No. 98), Forced Labour Convention, 1930 (No. 29), Abolition of Forced Labour Convention, 1957 (No. 105), Equal Remuneration Convention, 1951 (No. 100), Discrimination (Employment and Occupation) Convention, 1958 (No. 111), Minimum Age Convention, 1973 (No. 138), and Worst Forms of Child Labour Convention, 1999 (No. 182). [recommendation #7]</p> <p>Whereas the Government of Canada recognizes the gendered impacts of climate change and is committed to upholding women’s rights and addressing gender-based violence in the process of building a net-zero economy. [recommendation #4]</p> <p>...</p> <p>Whereas the Government of Canada’s approach to building a net-zero economy will be guided by the following principles:</p> <p>...</p>

(b) policies and programs in support of sustainable jobs should

(i) support the creation of jobs that are compatible with a net-zero emissions economy and with sustainable development, and that restrict pollution in frontline communities,

(ii) support the creation of decent work, meaning good-paying, high-quality jobs that involve the realization of the rights at work recognized in the International Labour

Organizations' Conventions ratified by Canada — including jobs in which workers are represented by a trade union — as well as job security, social protection and social dialogue,

(iii) safeguard intergenerational equity,

(iv) recognize local and regional needs,

(v) account for the cultural values, strengths and potential of workers and communities, and

(vi) provide an environment in which enterprises, workers, investors and consumers can contribute to achieving sustainable and inclusive economies and societies; [recommendation #8]

(c) a sustainable jobs approach should be inclusive and address barriers to employment with an emphasis on eradicating poverty and encouraging the creation of employment opportunities for groups underrepresented in the labour market, including women, persons with disabilities, Indigenous peoples, Black and other racialized individuals, 2SLGBTQI+ and other equity-seeking groups; it should ensure that the benefits of the transition to a net-zero economy are equitably shared and support populations most affected by climate change disruptions, and [recommendation #8]

(d) international cooperation should seek to fulfill Canada's obligations under Article 9 of the Paris Agreement, foster more equality between the Global North and the Global South, and foster strengthened global efforts to advance the creation of sustainable jobs and ensure a level playing field and inform Canadian approaches to support workers and communities in the shift to a net-zero economy; [related to recommendation #3 with regard to workers outside of Canada]

...

Whereas the Government of Canada recognizes the right to a healthy environment, adopted in 2023 into the *Canadian Environmental Protection Act*; [recommendation #9]

Purpose

3 The purpose of this Act is to facilitate and promote sustainable development, the creation of sustainable jobs and support for workers and communities in Canada in the shift to a net-zero economy through a framework to ensure transparency, accountability, engagement and action by relevant federal entities, including those focused — at the national and regional level — on matters such as skills development, the labour market, rights at work, economic development and emissions reduction. [recommendation #9]

Responsibilities

7 The Council's responsibilities include

(a) advising the Minister and specified Ministers on strategies and measures to encourage a transition away from animal agriculture as well as growth in good-paying, high-quality jobs — including jobs in which workers are represented by a trade union — in a net-zero economy; [recommendation #11]

(b) advising the Minister and specified Ministers on ways to address labour force impacts, support workers and create opportunities for workers in the shift to a net-zero economy;

- (c) advising the Minister and specified Ministers on the collection and overall quality of data related to economic growth and the labour market in a net-zero economy;
- (d) advising the Minister and specified Ministers on the effectiveness of relevant policies and programs, **including their effect on women working within and outside of the formal economy, the impacts of specific industries on women's economic equality, and their impact on violence against women, notably Indigenous women;** [related to recommendation #1]
- (e) engaging relevant partners and stakeholders in accordance with the terms of reference, **including engaging in consultations with women's rights organizations and advocates, including women's trade union representatives and women's committees;** and [recommendation #3]
- (f) addressing any matter or undertaking any activity provided for in the terms of reference or requested by the Minister under section 14 or 15.

Composition and appointment

8 (2) When making a recommendation respecting the appointment of members, the Minister is to take into consideration

- (a) the importance of having members that reflect Canada's diversity — including its regional diversity — and underrepresented groups;
- (b) the importance of having a balance of members who represent labour, Indigenous organizations and industry; and
- (c) the need for members who have knowledge, expertise or experience in one or more of the following:
 - (i) the key sectors impacted by the shift to a net-zero economy,
 - (ii) the impacts of key sectors, such as oil and gas and animal agriculture, on the climate crisis,** [recommendation #11]
 - (iii) the types of issues facing workers in the shift to a net-zero economy, including issues related to industrial change and technological transformation,
 - (iv) the representation of unionized workers,
 - (v) the needs and contributions of migrant workers** [recommendation #5]
 - (vi) the needs and contribution of female workers, including through the care economy,** [recommendation #1]
 - (vii) the Indigenous knowledge of Indigenous peoples,
 - (viii) climate change and climate policy at the regional, national and international levels,
 - (ix) economic and labour market analysis and forecasting,
 - (x) skills development, training and retraining initiatives at the regional and national levels,
 - (xi) the governance of advisory boards or committees, **and**
 - (xii) the needs of populations and communities most affected by climate change, including women, Indigenous women, and migrant populations.** [recommendation #2]

Sustainable Jobs Action Plan

16 (3) Each Plan must

- (a) outline how the federal government will facilitate and promote **sustainable development**, the creation of sustainable jobs and support for workers and communities in the shift to a net-zero economy over the following five-year period; [recommendation #9]
- (b) set out the measures that the Minister, specified Ministers and other relevant federal ministers have identified to be implemented, the milestones to be achieved by the federal entities for which they are responsible and the ways in which those ministers will implement those measures;

(c) set out how the Minister, specified Ministers and other relevant federal ministers will engage with marginalized communities, collect gender- and sex-disaggregated data, and report progress in an accessible manner; [recommendation #12]

(d) include a summary of available data related to economic growth, Canada's progress on the Sustainable Development Goals, and the labour market in a net-zero economy; and [recommendation #9]

(e) in the case of subsequent Plans, describe the progress made towards achieving the milestones under the previous Plans.

About our organizations

The David Suzuki Foundation is a national, bilingual non-profit organization founded in 1990 and headquartered in Vancouver, with offices in Toronto and Montreal. Our mission is to protect nature's diversity and the well-being of all life, now and for the future. Our vision is that we all act every day on the understanding that we are one with nature. Through evidence-based research, education and policy analysis, we work to conserve and protect the natural environment, and help create a sustainable Canada.

The **National Association of Women and the Law (NAWL)** works to achieve substantive equality and the realization of human rights for all women in Canada through legal education, research, strategic intervention, coalition work, and feminist law reform advocacy, particularly at the federal level. We advance women's rights by writing briefs and discussion papers, appearing before Parliamentary committees, and meeting with decisionmakers to influence the law-making process. Our three current priority areas are violence against women, reproductive justice, and women's rights in the climate crisis.

Oxfam Canada is an affiliate of the international Oxfam Confederation networked in 87 countries as part of a global movement for change. Our mission is to build lasting solutions to poverty and injustice with a focus on improving the lives and promoting the rights of women and girls. We work directly with communities, partners and women's rights organizations to challenge the systems that perpetuate inequality and keep people poor. We believe that ending global poverty begins with women's rights.