

November 18, 2009

Honourable Murray Coell
Minister of Labour
Government of British Columbia
Room 247, Parliament Buildings
Victoria, BC V8V 1X4

Dear Minister Coell,

Thank you for meeting with us on October 15, 2009 to discuss protecting children from injury and exploitation in the workforce. We are writing to follow-up on our recommendations.

We refer to recommendations in our report *What's Happening to Our Children? A Look at Child Work-Related Injury Claims in BC Over the Past 10 Years* and urge immediate government action on the following points.

1. Develop and enact legislation.

The provincial government must develop and enact legislation to protect children from work-related injuries. This includes bringing BC's legislative and regulatory framework into compliance with the UN Convention on the Rights of the Child. Specifically, renewed legislation should be in full compliance with the intent and standards articulated in Article 32 of the Convention and with the International Labour Organization's Minimum Age Convention (Convention 138), including setting a minimum work start age of 15 years.

In light of anticipated, increased commercial activity related to hosting the Olympics, at the very least, we recommend immediate interim measures that detail prohibited occupations and tasks in the employment of children. We refer you the Government of Alberta's restrictions for 12 to 14 year olds, and 15 to 17 year olds, as an example. Restrictions related to the time of day of allowable work, e.g. late night work, are also urgently needed.

These restrictions must be enforced by the Employment Standards Branch and BC employers must understand and appreciate the special responsibilities that come with employing children.

2. Establish a multi-stakeholder advisory group.

We recommend the government immediately establish a child labour advisory group that includes a broad representation of child and youth advocates, including young people with recent work experience in the higher injury occupations.

This community of individuals and organizations has expertise, experience and perspectives that can assist in crafting legislation and regulation that allow for appropriate first-work opportunities while ensuring children are safe, protected and supported to finish their first phase of schooling.

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3. Gather and monitor data.

As we discussed, it is difficult, if not impossible, in the current circumstances, to gather information about how many children are working and at what occupations and tasks. Knowledge is the foundation of sound decision-making.

We strongly advise the government to find ways to keep track of the employment of children. Each accepted work-related injury claim represents a much higher number of other children working in BC. Understanding how children are participating in the work force is critical to managing their risk of injury and exploitation in an effective manner.

We thank you for your attention to this urgent issue and look forward to hearing from you.

Sincerely,



Adrienne Montani, Provincial Coordinator
First Call: BC Child and Youth Advocacy Coalition
Also on behalf of Helesia Luke and Catherine Evans