



March 19, 2024

Via email: [LBR.Minister@gov.bc.ca](mailto:LBR.Minister@gov.bc.ca)

Honourable Harry Bains, MLA  
Minister of Labour  
PO Box 9064 Stn Prov Govt  
Victoria BC V8W 0E2

**Re: Regulatory process for implementation of *Labour Statutes Amendment Act***

Dear Minister,

We write to underscore the need for a measured approach to the implementation of the *Labour Statutes Amendment Act*, which received Royal Assent on November 30, 2023. Our organization represents over 200 of B.C.'s leading businesses, many of whom use, deliver or depend on app-based services.

We believe it is important that the regulatory process to implement the *Act* not be rushed. We raise these concerns as we have seen rushed announcements and consultations on other files, for example on proposed changes to the *Land Act* and the review of the *Labour Relations Code*. As raised in our [letter to Parliamentary Secretary Routledge of September 29, 2023](#), we reiterate the need to be mindful of cost implications for consumers, delivery drivers and businesses when considering changes to employment regulations affecting app-based platforms.

The regulatory process should allow for sufficient consultation and stakeholder input so that implementation problems and costly service disruptions are avoided. Large ride-hail and delivery platforms operating in B.C. have experienced implementation setbacks in other jurisdictions like New York City where new regulations unwittingly shut down delivery to 10,000 people on Roosevelt Island. The city had to withdraw the regulations and restart the process. Seattle also saw major disruptions for customers and lost revenues for businesses and drivers after the introduction of new employment regulations in January. In Minneapolis, some rideshare companies are considering suspension of service ahead of a new pay ordinance taking effect on May 1.

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From the time the government publishes the final regulations, our understanding is that app-based platforms will need at least eight months to come into compliance. Engineering new features on these platforms takes substantial time because of their scale and complexity; most ride hail and delivery services run on platforms that operate across many countries and are used by millions of drivers. The technology is complicated. Each change needs to be designed, developed and tested before it can be rolled out. Because these changes are so complex, the process cannot begin until the regulations are finalized and the specific requirements are known.

It is our hope that B.C. can minimize costly disruptions to the app-based economy through a consultative regulatory process and an implementation period of at least eight months.

Thank you for your attention to this matter.

Yours sincerely,



Laura Jones  
President and Chief Executive Officer



David Williams, DPhil  
Vice President of Policy

cc: Janet Routledge, MLA, Parliamentary Secretary for Labour  
Trevor Hughes, Deputy Minister of Labour  
John-Michael McColl, Executive Director, Planning & Priorities Secretariat, Office of the Premier