

June 5, 2020

The Honourable Bill Morneau  
Minister of Finance, Government of Canada  
90 Elgin Street  
Ottawa, Ontario K1A 0G5

**RE: Canada Emergency Wage Subsidy Consultation**

Dear Minister Morneau,

Thank you for your continued leadership during the COVID-19 pandemic. As the situation evolves, the Ontario Chamber of Commerce (OCC) is receiving concerns from the business community and communicating them to all levels of government.

The Canada Emergency Wage Subsidy (CEWS) is a critical measure to support employers and employees throughout these challenging times, and we appreciate government's willingness to listen and respond to input from stakeholders.

Going forward, we recommend the following improvements to ensure the CEWS achieves its desired impact on employment and economic well-being:

- Introduce a pro-rated subsidy when revenue loss is less than 30 percent. This will be important as the economy continues to reopen and businesses' operations pick up. While they may no longer be experiencing a year-over-year revenue loss of at least 30 percent, many will continue to need assistance as they try to recover.
- Allow businesses (many of which are not-for-profits and/or small businesses) that use third-party payroll providers to qualify for the CEWS. For example, some chambers of commerce are currently ineligible because municipalities are processing their payrolls. A similar issue exists for health care providers that rely on cost-sharing arrangements to pay staff, making many health care workers ineligible for the CEWS despite meeting all other program requirements.
- Allow companies that acquired other businesses earlier in 2020 – and therefore saw an increase in consolidated revenue for the months in 2020 prior to the COVID-19 crisis – to base their revenue calculations on what they were prior to the acquisition.
- Allow companies with several business units to apply for the CEWS on a unit-by-unit basis.
- Adjust the CEWS so that it becomes a tool to transition workers and employers off the Canada Emergency Response Benefit (CERB).

Public health and safety are priorities for Canadian businesses. We will continue to monitor and assess new developments pertaining to COVID-19 closely and work with our members, partners, and all levels of government to support workers and businesses across Canada.

Sincerely,



Rocco Rossi  
*President and CEO*  
*Ontario Chamber of Commerce*

CC: The Honourable Mary Ng, Minister of Small Business, Export Promotion and International Trade,  
Government of Canada