## Eligibility and Benefits

(para. 37): The proposed <u>sickness and maternity benefits</u> are welcomed, but the sickness provision should apply throughout the entire possible duration of unemployment insurance benefits (up to 51 weeks), not just up to 15 weeks.

(para. 38): The proposals re conditions of entry, as far as length of attachment to the labour force are concerned, are an improvement. But the exclusion of regularly employed (usually part-time) people earning under \$25 a week is questioned as being unjust to this group.

(para. 39): The proposed raised <u>level of benefits</u> is welcome but with reservations; it does not go far enough in maintaining the standard of living of the unemployed; increases in the income ceiling for receiving benefits should be adjusted on a regular automatic basis, not intermittently at the will of the government; the effect of taxing the benefits (already recommended by the CWC) will bear heavily on lower-income people if deducted at the time of payment.

(in addition to that for sickness) are questioned: i.e., extension of the waiting period from one to two weeks; the reduction of the maximum benefit from 51 to 43 weeks except when the national or regional rate exceeds 4 per cent; the delay in the commencement of the increased benefit for dependents, and the anomaly that one group (those with least attachment to the labour force) can claim it after 5 months of unemployment while others must wait for 7 months.

## Contributions

(para. 41): The proposed lowering of the employee contributions rate is desirable, but the reference to its adjustment to "the average unemployment rate" should be clarified. The reduced rate for new categories of entrants into the scheme is questioned.

(para. 42-44): The proposal for experience-rating of employer contributions is argued against and its deletion from the revised scheme urged.

(para, 45): The question of <u>federal government</u> contributions has been discussed in detail in para. 21-28, pp. 14-21, of the Submission.

October 1970