

**Written Submission for Pre-Budget Consultations in Advance of the  
Upcoming Federal Budget**

Submitted to Department of Finance Canada by the Women's Legal  
Education and Action Fund (LEAF)



**LEAF**  
**FAEJ**

WOMEN'S LEGAL  
EDUCATION & ACTION FUND  
FONDS D'ACTION ET D'ÉDUCATION  
JURIDIQUE POUR LES FEMMES

August 25, 2025

## **Recommendations**

- **Recommendation 1:** That the government create an independent federal Gender-Based Violence Commissioner to monitor the implementation of Canada's National Action Plan on Gender-Based Violence and future efforts to end gender-based violence, with an annual budget of \$3 million.
- **Recommendation 2:** That the government amend the *Employment Insurance Act* in order to address gender-based discrimination.
- **Recommendation 3:** That the government provide operational funding of \$50 million over five years, starting in 2026-27, to support national gender equality organizations advancing systemic change for women, girls, trans and non-binary people in Canada.

Investing in Canada requires investing in women, girls, and trans and non-binary people, and in national organizations advancing their rights. We cannot have a strong economy or a resilient society without addressing the ongoing gender-based violence epidemic. In addition, in the face of ongoing tariff threats and looming layoffs, we need to ensure new parents at risk of losing their jobs are not left without essential financial supports simply because they took time off work to care for a child.

Our budget submission makes three recommendations that are modest in annual cost and have the potential for significant returns on investment.

**Recommendation 1: That the government create an independent federal Gender-Based Violence Commissioner to monitor the implementation of Canada’s National Action Plan on Gender-Based Violence and future efforts to end gender-based violence, with an annual budget of \$3 million.<sup>1</sup>**

A government focused on strengthening the economy, spending less on government operations, and helping Canadians get ahead cannot ignore the financial costs of Canada’s gender-based violence (GBV) epidemic. Those costs are borne by individuals, families, and communities – but also by our healthcare, social services, and justice systems. In 2009, for example, intimate partner violence cost approximately \$7.4 billion, with sexual violence costing \$4.8 billion.<sup>2</sup>

The federal government is rightly following through on prior investments committed to ending GBV through the National Action Plan on Gender-Based Violence (NAPGBV), providing \$539.3 million to provinces and territories via bilateral agreements lasting through March 2027.<sup>3</sup> There is, however, currently no independent mechanism providing oversight or accountability for this work. With no funding currently committed beyond

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<sup>1</sup> For a more detailed overview of the features of a federal GBV Commissioner, see Amanda Dale, “What It Takes: Establishing a Gender-Based Violence Accountability Mechanism in Canada”, *Women’s Legal Education and Action Fund*, <https://www.leaf.ca/publication/what-it-takes-establishing-a-gender-based-violence-accountability-mechanism-in-canada/>.

<sup>2</sup> See Ting Zhang, Josh Hoddenbagh, Susan McDonald, and Katie Scrim, “An Estimation of the Economic Impact of Spousal Violence in Canada, 2009”, *Government of Canada*, last modified April 17, 2023, <https://www.victimsworld.gc.ca/res/r517.html>; Josh Hoddenbagh, Tina Zhang, and Susan McDonald, “An Estimation of the Economic Impact of Violent Victimization in Canada, 2009”, *Government of Canada*, last modified December 14, 2021, [https://justice.gc.ca/eng/rp-pr/cj-jp/victim/rr14\\_01/p0.html](https://justice.gc.ca/eng/rp-pr/cj-jp/victim/rr14_01/p0.html).

<sup>3</sup> See Women and Gender Equality Canada, “Bilateral Agreements to End Gender-Based Violence,” *Government of Canada*, last modified December 10, 2024, <https://www.canada.ca/en/women-gender-equality/gender-based-violence/intergovernmental-collaboration/bilateral-agreements.html>.

2027, the federal government urgently needs to bridge this gap to maximize results from the investments that have already been made.

**We recommend the creation of a federal GBV Commissioner, a human rights ombuds-type role with a specific focus on gender-based violence, to monitor the implementation of Canada’s NAPGBV and future efforts to end GBV in Canada.**

There is currently significant uncertainty about the funding of the NAPGBV. Establishing a federal GBV Commissioner will not remove the need for future investments, but will help ensure that existing investments in the NAPGBV are as productive as possible. The creation of such an office would also bring Canada in line with other jurisdictions with similar offices, including the United Kingdom, Australia, New Zealand, and Finland.

The GBV Commissioner would be independent and separate from existing ministries, ideally appointed through an open process, selected by a parliamentary committee, appointed by Parliament, and reporting to Parliament. It would have a powerful persuasive role, full powers of review for matters within federal jurisdiction, and the ability to intervene in court cases related to its mandate.

**We recommend an annual budget of \$3 million for the GBV Commissioner.** This would allow appropriate staffing to advance robust linkages with other ombuds offices; a meaningful and integrated Intersectional Survivor, Advocacy, and Support Sector Advisory Body; advanced research and evaluation capabilities; and productive relationships with related federal entities.

A GBV Commissioner would ensure that existing funds committed to Canada’s NAPGBV are spent efficiently, and that the value of these investments are maximized, including through:

- **Better resource allocation:** identifying priority populations, outcome measurements, gaps, and redundancies in service provision
- **Enhanced monitoring and oversight:** supporting continuous improvement in strategies and interventions, particularly the use of federal funds intended to be dedicated to GBV initiatives in the provinces and territories, as evaluated in collaboration with affected communities
- **Improved recommendation implementation:** through tracking, research, data and engagement, helping to ensure the effective implementation of policies and recommendations

GBV has a staggering financial cost – amounting to potentially billions per year – not to mention its innumerable emotional, physical, and social costs. As the federal government

aims to spend less so that Canada can invest more, we are adamant that an investment in a GBV Commissioner is an essential investment in Canada and in Canadians. It is not only crucial to improving efficiency and results from existing government investments, but is also a necessary step towards reducing the costs of GBV and moving towards a safer, stronger Canada.

**Recommendation 2: That the government amend the *Employment Insurance Act* in order to address gender-based discrimination.**

Canada is navigating a period of economic uncertainty sparked by U.S. tariffs – both ones that have been already implemented and ongoing threats of those to come. It has been well documented that women bear the brunt of economic crises.<sup>4</sup> As part of the federal government’s efforts to support workers in Canada through this turbulent time, it must address longstanding gaps in the *Employment Insurance Act* (EIA) that have disproportionate economic impacts on women.

Currently, individuals who receive maternity and parental benefits and subsequently lose their jobs are ineligible for Employment Insurance (EI) regular benefits. This disproportionately affects women, particularly those in precarious, part-time, and low-income employment – many of whom are racialized and migrant workers.

While the government’s current temporary EI measures – waiving the EI waiting period, suspending the allocation of separation earnings, and adjusting the unemployment rate in certain regions – are a positive step towards supporting workers impacted by the tariff crisis, additional measures that address discriminatory gaps in the *Employment Insurance Act* are urgently needed to ensure that no one is left behind.

**Building off the advocacy by MAC Montreal on this issue,<sup>5</sup> we urge the federal government to immediately amend the *Employment Insurance Act* as follows to ensure that people who receive parental and maternity benefits – primarily women – who lose their jobs during or soon after parental leave can access EI regular benefits:**

- **Repeal Subsection 12(6) of the *Employment Insurance Act*** to remove the 50-week cap on combining Employment Insurance regular benefits and special benefits for maternity or parental leave.

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<sup>4</sup> See Robert Blanton, Shannon Blanton, and Dursun Peksen, “The Gendered Consequences of Financial Crises: A Cross-National Analysis” (24 October 2018), <https://www.cambridge.org/core/journals/politics-and-gender/article/gendered-consequences-of-financial-crises-a-crossnational-analysis/D1AC21136BC81F7EAE7710379CE06A44>.

<sup>5</sup> See “Mouvement Action-Chômage”, <https://macmtl.qc.ca/femmes/>.

- **Amend Subsection 10(10) of the *Employment Insurance Act*** to add maternity and parental leave benefits as a reason to extend the benefit period to 104 weeks.

These amendments would significantly benefit many new parents and their families, while the costs would be minimal. The government reports that from 2006 to 2019, an average of 3,300 women per year were impacted by the 50-week limit on coupling regular and special benefits.<sup>6</sup> This was compared to less than 500 men – a difference that reflects the gendered reality of childcare. Meanwhile, the NDP estimates that extending benefits for these workers would cost the government \$15 million per year – less than 0.01% of what EI paid out in 2019.<sup>7</sup>

Tariff-induced layoffs have already begun, with manufacturing jobs alone down 55,000 since January 2025.<sup>8</sup> Economists have warned that more job losses across industries are to come, as the ripple effects of the tariff crisis threaten an economic slowdown.<sup>9</sup> Further, some Canadians face additional layoff risks that are not just tariff-driven – potential upcoming cuts to the federal government workforce could result in the loss of up to 57,000 jobs as the government aims to reduce spending.<sup>10</sup> Under the current EI framework, new parents laid off in the coming weeks and months while or shortly after having been on parental leave will be left without income replacement at a time when they and their families need it most.

We urge immediate action to ensure that no parent faces economic insecurity simply for taking leave to care for their children. By addressing gaps in the *Employment Insurance Act* that have disproportionate impacts on women, the government can take a decisive step towards equal access to economic security – a crucial foundation for a healthy, thriving economy.

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<sup>6</sup> See Employment and Social Development Canada, “Evaluation of the Employment Insurance Maternity and Parental Benefits”, *Government of Canada*, last modified April 26, 2023, <https://www.canada.ca/en/employment-social-development/corporate/reports/evaluations/ei-maternity-parental-benefits.html>.

<sup>7</sup> Saba Aziz, “Canada’s EI system is ‘unfair’ for new parents, NDP and labour unions say” (15 February 2024), *Global News*, <https://globalnews.ca/news/10296521/canada-ei-rules-new-parents-ndp-letter/>.

<sup>8</sup> Tiff Macklem, “The impact of US trade policy on jobs and inflation in Canada” (18 June 2025), *Bank of Canada*, <https://www.bankofcanada.ca/2025/06/the-impact-of-us-trade-policy-on-jobs-and-inflation-in-canada/>.

<sup>9</sup> See Katherine Scott, “Which Canadian workers will be hit hardest by a trade war with the United States?” (17 February 2025), *Canadian Centre for Policy Alternatives*, <https://www.policyalternatives.ca/news-research/which-canadian-workers-will-be-hit-hardest-by-a-trade-war-with-the-united-states/>; Florence Jean-Jacobs, “Which Sectors of the Economy Are Most Vulnerable to Trump’s Tariffs?” (17 January 2025), *Desjardins*, <https://www.desjardins.com/content/dam/pdf/en/personal/savings-investment/economic-studies/canada-tariff-vulnerability-17-january-2025.pdf>.

<sup>10</sup> David Macdonald, “A stiff price to pay: Predicting federal job losses due to Carney’s cuts” (24 July 2025), *Canadian Centre for Policy Alternatives*, <https://www.policyalternatives.ca/news-research/a-stiff-price-to-pay-predicting-federal-job-losses-due-to-carneys-cuts/>.

**Recommendation 3: That the government provide operational funding of \$50 million over five years, starting in 2026-27, to support national gender equality organizations advancing systemic change for women, girls, trans and non-binary people in Canada**

National gender equality organizations provide invaluable research, legal expertise, policy analysis, and advocacy to advance gender equality in Canada. Elected officials, government departments, House of Commons and Senate committees, and other political and policy actors regularly call on these organizations to help inform federal level policy and legislation. This expertise helps the government do more while spending less on its own operations, but requires national organizations to have sufficient capacity.

All gender equality organizations experience funding precarity and require a continued funding commitment at the scale that the current moment requires. At the same time, organizations with a national scope face distinct funding challenges. Cuts to federal funding for national gender equality organizations in 1998 resulted in an end to crucial operational funding. This funding has never been reinstated, despite the fact that other national organizations ([including over 60 national sporting associations](#)) receive operational funding from the federal government. Further, given their national scope, these organizations (with very few exceptions) cannot access funding from other levels of government or from many other funding bodies,<sup>11</sup> nor does the National Action Plan to End Gender-Based Violence include funding for national-level work.

**With operational funding of \$10 million a year over five years, national gender equality organizations can be well-positioned to contribute to the government’s goal of a stronger, safer Canada, including through:**

- Helping address the ongoing gender-based violence epidemic
- Supporting the participation of women, trans, and non-binary people in the labour market and economy
- Pushing back against growing extremist movements rooted in misogyny and hate

At a time when Canada is facing a series of national crises with disproportionate impacts on women, girls, trans, and non-binary people, it is imperative that the federal government invests in national gender equality organizations as part of its response. An investment of \$10 million per year over five years would enable national organizations to continue their vital work, helping strengthen government policy and legislative responses and enabling all Canadians to get ahead.

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<sup>11</sup> See “Resetting Normal: Funding a Thriving Women’s Sector”, *Canadian Women’s Foundation*, <https://canadianwomen.org/wp-content/uploads/2020/05/Resetting-Normal-Report-Womens-Sector.pdf>.

**About the Women's Legal Education and Action Fund (LEAF)**

LEAF is a national, charitable, non-profit organization that works towards ensuring the law guarantees substantive equality for all women, girls, trans, and non-binary people. LEAF has long-standing expertise in gender-based violence, including both prevention and legal responses. LEAF has developed expertise in the gendered and intersectional impacts of social benefit and insurance schemes by intervening in key cases and by making submissions to Parliament. Learn more about LEAF at [www.leaf.ca](http://www.leaf.ca).