

Written Submission for the 2026 Pre-Budget Consultations

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



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FAEJ

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

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Acknowledgement

Building Canada strong requires ending the ongoing gender-based violence (GBV) epidemic. We are grateful for the recent announcement of \$607.4 million of funding over four years to advance the next phase of the National Action Plan to End Gender-Based Violence, demonstrating Canada's commitment to continued coordinated action to prevent GBV, and build safer communities across the country.¹

Budget Recommendations

- **Recommendation 1:** That the government strengthen the Employment Insurance system to protect Canadian workers who have family care responsibilities during the tariff crisis.
- **Recommendation 2:** That the government commit to investing in key infrastructure to address the GBV epidemic by:
 - (a) Funding the renewal of a comprehensive Federal GBV Strategy to address GBV at the national level with ongoing funding of \$44 million annually.
 - (b) Creating an independent federal GBV Commissioner to monitor the implementation of the National Action Plan to End Gender-Based Violence and future efforts, with an annual budget of \$3 million.
- **Recommendation 3:** That the government commit to providing operational funding of \$10 million per year for five years, starting in 2027-28, to support leading national women's rights organizations to protect women's rights, address the GBV epidemic, and increase women's economic security and prosperity.
- **Recommendation 4:** That the government commit to renewing stable, multi-year funding to the Canada Black Justice Strategy's 10-year Implementation Plan to address the systemic factors that expose Black women, trans, and non-binary people to disproportionate justice system contact.

¹ Government of Canada. "Minister Valdez announces \$607.4 million to advance the next phase of the National Action Plan to End Gender-based Violence", (16 July 2026), online: *Government of Canada* <<https://www.canada.ca/en/women-gender-equality/news/2026/07/minister-valdez-announces-6074-million-to-advance-the-next-phase-of-the-national-action-plan-to-end-gender-based-violence.html>>.

Building Canada strong cannot be done without investments in national infrastructure rooted in equality, a cornerstone of Canadian identity. LEAF's budget submission makes four recommendations, with promising returns on investment, that contribute to the government's goal of a resilient economy that is uniquely Canadian.

Recommendation 1: That the government strengthen the Employment Insurance system to protect Canadian workers who have family care responsibilities during the tariff crisis.

Workers with family care responsibilities – who are overwhelmingly women – face barriers to accessing employment insurance (EI) due to longstanding gaps in the *Employment Insurance Act*. Workers are the backbone of the Canadian economy, yet these workers, who on top of their contributions to the Canadian economy provide invaluable care work for their families and communities, are often left without income support after job separation. This issue is especially urgent at a time when Canadians continue to navigate a struggling labour market weakened by U.S. tariffs, including a potential loss of up to 87,000 jobs from new U.S. tariffs.²

Taking on family care responsibilities can impede a person's access to EI by:

- Pushing them to work part-time instead of full-time, making it more difficult to reach the number of hours needed to qualify for EI
- Disqualifying them from receiving EI regular benefits if they lose their job right before, during, or soon after parental leave

Women are disproportionately impacted as the primary bearers of household and family care responsibilities,³ which only grow when affordable childcare is inaccessible. Indeed, women are twice as likely than men to be working part-time⁴ and are five times more likely to cite childcare, personal, or family responsibilities as their primary reason for doing so.⁵ Women, trans, and non-binary people are also all more likely than cis men to be single

² “Tens of thousands of jobs, half a point off GDP: Canada-U.S. trade war by the numbers”, (24 Aug 2026), online: *CBC News* <<https://www.cbc.ca/news/business/trade-war-by-the-numbers-9.7318683>>.

³ Melissa Moyser & Amanda Burlock, “Time use: Total work burden, unpaid work, and leisure” (30 July 2018), online: *Statistics Canada* <<https://www150.statcan.gc.ca/n1/pub/89-503-x/2015001/article/54931-eng.htm>>.

⁴ Statistics Canada, “Proportion of workers in full-time and part-time jobs by gender, annual” (9 January 2026), online: *Statistics Canada*: <<https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1410032703>>.

⁵ Statistics Canada, “Part-time employment by reason, annual (x 1,000)” (9 January 2026), online: *Statistics Canada*: <<https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1410002901&pickMembers%5B0%5D=1.1&pickMembers%5B1%5D=3.3&pickMembers%5B2%5D=4.1&cubeTimeFrame.startYear=2021&cubeTimeFrame.endYear=2025&referencePeriods=20210101%2C20250101>>.

parents, making them the sole or main provider of childcare.⁶ Further, because they're overrepresented in low-waged work,⁷ women, trans, and non-binary people often do not receive sufficient income replacement when they do qualify for EI.

The value of unpaid care work, not just for Canadian families but for Canada as a whole, cannot be overstated. In 2019, the economic value of unpaid household work in Canada was between \$516.9 billion and \$860.2 billion – which amounts to 25.2% - 37.2% of the country's GDP that same year.⁸

The government must recognize the invaluable contributions of workers who provide the household and caregiving labour foundational to building Canada strong from coast to coast to coast. **Building off the advocacy by MAC Montreal on this issue,⁹ we urge the federal government to make the following reforms to the Employment Insurance system so that family caregivers are protected during the tariff crisis:**

1. Setting 420 hours Canada-wide to qualify for a basic regular or special EI claim.
2. Providing a minimum weekly benefit and increasing the current 55% replacement rate to at least 66.6%.
3. Allowing parents to access their full entitlement to both EI regular and parental benefits if they lose their jobs right before, during, or soon after parental leave. This is particularly pressing as the Federal Court of Appeal recently ruled that not doing so is discriminatory, and that the government must rewrite the law to make it comply with the *Charter*. To comply with the decision, the government should:
 - a. Repeal Subsection 12(6) of the *Employment Insurance Act (EI Act)* to remove the 50-week cap on combining EI regular benefits and special benefits for maternity or parental leave.
 - b. Amend Subsection 10(10) of the *EI Act* to add maternity and parental leave benefits as a reason to extend the benefit period to 104 weeks.

By implementing these reforms, the Canadian government can help keep money in the pockets of Canadians, sustain local economies, and reduce the severity of recessions,

⁶ Avery Beall, France-Pascale Ménard, Jean-François Roy, and Karen Rauh, “Socioeconomic outcomes of transgender and non-binary people in Canada” (released on 16 October 2025), *Statistics Canada*, online: <<https://www150.statcan.gc.ca/n1/pub/91f0015m/91f0015m2025001-eng.htm>>.

⁷ Jessica Gill, “Employees with low pay, 2024” (18 August 2025), online: Statistics Canada <<https://www150.statcan.gc.ca/n1/pub/14-28-0001/2025001/article/00002-eng.htm>>; 6 Avery Beall, France-Pascale Ménard, Jean-François Roy, and Karen Rauh, “Socioeconomic outcomes of transgender and non-binary people in Canada” (released on 16 October 2025), online: Statistics Canada <<https://www150.statcan.gc.ca/n1/pub/91f0015m/91f0015m2025001-eng.htm>>

⁸ Sandy Besporstov & Amanda Sinclair, “Estimating the economic value of unpaid household work in Canada, 2015 to 2019” (17 March 2022), online: *Statistics Canada* <<https://www150.statcan.gc.ca/n1/pub/13-605-x/2022001/article/00001-eng.htm>>.

⁹ See “Mouvement Action-Chômage”, <<https://macmtl.qc.ca/femmes/>>.

while demonstrating Canada's commitment to confronting systemic barriers and advancing equal access to income support. These reforms are more important now than ever as Canada looks to weather the consequences of U.S. tariffs and build at home.

Recommendation 2: Investing in key infrastructure to address the GBV epidemic.

We cannot build a strong Canada without ending the gender-based violence (GBV) epidemic, the costs of which are borne by individuals, families, and communities – but also by our healthcare, social services, and justice systems. For example, every year, sexual violence alone costs survivors \$14.8 billion, with government tax revenues falling by \$55.5 million.¹⁰

We know that this government understands that, and we are grateful for the recent announcement of \$607.4 million of funding over four years to advance the next phase of the National Action Plan to End Gender-Based Violence (the “NAP”), demonstrating Canada’s commitment to preventing GBV and building safer communities across the country.¹¹

Two additional steps would help ensure the impact of the government’s investment in the NAP.

First, renewing a comprehensive Federal GBV Strategy to address GBV at the national level, with ongoing funding of \$44 million annually, would address gaps in supports, including for survivors in rural, remote, and Northern communities. Until every survivor has access to services, and until rates of GBV are declining, we need a coordinated, well-resourced national response that centres those most vulnerable to GBV, including disabled women, Indigenous women, racialized women, trans and non-binary people, and women who are homeless or underhoused.

Second, the establishment of a GBV Commissioner would enable the coordinated action across federal departments, provinces, territories, and community organizations

¹⁰ Ending Sexual Violence Association of Canada & Ripple Strategy. “New report finds sexual violence costs victims \$14.8 billion annually in Canada”, (6 May 2026), online: *Ending Sexual Violence Association of Canada* <<https://endingviolencecanada.org/news/new-report-finds-sexual-violence-costs-victims-14-8-billion-annually-in-canada>>.

¹¹ Government of Canada. “Minister Valdez announces \$607.4 million to advance the next phase of the National Action Plan to End Gender-based Violence”, (16 July 2026), online: *Government of Canada* <<https://www.canada.ca/en/women-gender-equality/news/2026/07/minister-valdez-announces-6074-million-to-advance-the-next-phase-of-the-national-action-plan-to-end-gender-based-violence.html>>.

necessary to prevent violence and address service gaps.¹² This office would oversee the NAP and the renewed Federal GBV Strategy, strengthen transparency and accountability, and help ensure Canada meets its international obligations. It would also support greater consistency across jurisdictions and help ensure NAP funds are used efficiently. Establishing this role would bring Canada in line with jurisdictions such as the United Kingdom, Australia, New Zealand, and Finland.

GBV has a staggering financial cost – amounting to billions per year – not to mention its innumerable emotional, physical, and social costs. As the federal government aims to build Canada strong, investing in infrastructure to end GBV must be part of the plan. 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 3: Invest in National Women’s Rights Organizations (NRWOs).

NWROs play a major role in Canada’s commitment to confronting systemic barriers by providing invaluable research, legal expertise, policy analysis, and advocacy with the goal of advancing gender equality in Canada. Investing in NWROs means investing in equality – a core Canadian value that is one of the country’s greatest strengths. It’s also a smart economic investment: advancing gender equality could contribute up to \$150 billion to Canada’s GDP.¹³ However, NWROs lack the stable funding they need to sustain their critical work.

NWROs have faced increasing financial precarity over the last couple of decades, starting with federal cuts to their operational funding in 1998. 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.

¹² 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/>>

¹³ Women and Gender Equality Canada. “Facts, stats, and impact: Gender equality”, (9 December 2025), online: *Canada.ca* <<https://www.canada.ca/en/women-gender-equality/gender-equality/facts-stats-impact.html>>.

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,¹⁴ nor does the NAP include funding for national-level work.

With operational funding of \$10 million per year over five years, NWROs can be well-positioned to contribute to a stronger, more resilient Canada, including through:

- Helping address the ongoing GBV epidemic and build safer communities
- 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, which push women, trans, and non-binary people away from leadership and economic opportunities

Elected officials, government departments, House of Commons and Senate committees, and other political and policy actors regularly call on NWROs to help inform federal level policy and legislation. This expertise helps the government do more while spending less on its own operations, but requires NWROs to have sufficient capacity.

NWROs help ensure that equality – a core Canadian value – is embedded within much of the country’s key national infrastructure. Investing in NWROs is an investment in a more equal future that is strong, resilient, and uniquely Canadian.

Recommendation 4: Invest in long-term funding for the Canada Black Justice Strategy (CBJS) implementation.

Building a strong Canada means ensuring that all Canadians can thrive at home, at work, and in their communities. Because misogyny and anti-Black racism, together known as misogynoir, is embedded throughout Canadian society, Black women, trans, and non-binary people often face uniquely challenging barriers to accessing the social and economic supports necessary to thriving, including housing, education, employment, and health care. Misogynoir also means that they disproportionately experience encounters with the justice system and face higher risks of severe outcomes, increasing the risk of violence, undermining community safety, and placing additional strain on Canada’s already overburdened healthcare, social services, and justice systems.

The federal government has recognized that anti-Black racism in the justice system creates barriers for Black communities and requires a coordinated response, providing

¹⁴ The Canadian Women’s Foundation et al. “Resetting Normal: Funding a Thriving Women’s Sector”, (May 2020), online: *The Canadian Women’s Foundation* <<https://canadianwomen.org/wp-content/uploads/2020/05/Resetting-Normal-Report-Womens-Sector.pdf>>.

important initial investment in the CBJs and its 10-year Implementation Plan.¹⁵ The CBJs is a vital instrument for addressing anti-Black racism, identifying concrete ways to address racial and gender-based inequalities in employment, income, housing, education, and health, to ultimately reduce disproportionate justice-system contact.

The successful implementation of the CBJs, however, requires the government to provide predictable, long-term funding to implement these measures. Fragmented, short-term funding will not sustain necessary structural reforms, which require sustained implementation through adapting institutional practices, maintaining community partnerships, and expanding tools such as diversion and culturally-specific supports.

Investing in the long-term funding of the CBJs is an investment in a strong and equitable Canada. It will strengthen community participation in work and education, improve confidence in public institutions, and reduce long-term costs associated with overburdened healthcare, social services, and justice systems. It will also prevent violence, support survivors, and produce the disaggregated data needed to identify and respond to unequal outcomes for Black women, trans, and non-binary people.

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, and the effects of anti-Black racism on Black women, girls, trans, and non-binary people. 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.

¹⁵ “Toward Transformative Change: an Implementation Plan for Canada’s Black Justice Strategy” (Department of Justice Canada, 2025), online: <https://www.justice.gc.ca/eng/cj-jp/cbjs-scjn/ttc-ect/pdf/CS-24-175-Implementation_Plan-EN.pdf>.