

October 19, 2016

The Honourable Jean-Yves Duclos,  
Minister of Families, Children and Social Development  
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The Honourable Mr. Duclos:

Thank you for the opportunity to provide views on options to help parents and their families in the context of Employment Insurance (EI) maternity and parental benefits and unpaid leave under the Canada Labour Code. As the national organization supporting families with multiple births (twins, triplets and beyond), Multiple Births Canada is able to provide you with important considerations with respect to your present consultation.

The current method of allocating benefits under Canada's EI Parental Benefits, based solely on the pregnancy and ignoring the number of children, is failing Canada's multiple-birth families. It does not provide them with sufficient time and financial support to adequately care for and bond with two or more babies. Each infant deserves the same attention, care and bonding time with parents that a single-born baby receives. The goal of the parental benefits should be to have multiple-birth infants reach a comparable level of child development as single-born babies, while helping parents address the double (or more) physical demands of caring for newborns.

Compared to parents with a single baby, parents who give birth to two, three or more babies need more time at home for the following reasons:

1. Since mothers of multiples are more likely to have a caesarean delivery and other pregnancy complications, they experience delayed recovery, and difficulty in holding, carrying and caring for infants.
2. Over half of all multiple-birth infants are born early and/or too small, are more vulnerable and have a greater incidence of infant death, and short and long term health problems including mental development issues. It takes longer for the babies to reach an equivalent level of development compared with their single-born counterparts, on average.
3. Physical and emotional stress for parents and caregivers, due to the demands of caring for the babies, other siblings (if any), and running the household.
4. Parents often face a financial dilemma – they assume extraordinary financial commitments yet if they return to the paid labour force, suitable childcare for two or more babies can be very expensive and difficult to find.





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In 2009 a Canadian father of twins tried to correct the EI parental benefits system through appeals to the courts. He took time off from work to care for his children as a direct result of having a second newborn child. With his wife also home, he was unable to receive a penny from EI to support his family because of the pregnancy basis for the benefits, a basis that was confirmed with the subsequent legal decisions. Denying the second parent of multiples the same benefits to care for a newborn child that parents of single-born children take for granted is a striking example of how the current system must be changed. Another similar case is presently before the Canadian Human Rights Commission. It should not take courageous parents pushing legal disputes at their own expense to correct this problem.

During the last Parliamentary session, the Liberals voted in favour of Bill C-464 at second reading which attempted to provide more leave time and benefits for multiple-birth parents. While it did not propose to correct the pregnancy basis for providing parental benefits, it would have been a large step in the right direction by doubling the value of a multiple birth from 35 to 70 weeks of parental benefits. Parental benefits should be allocated based on the presence of a newly born or newly adopted child in the care of a parent, not on the basis of the pregnancy or the adoption placement which has no relation to the need for, or act of, caring for a new child. We ask that the Liberal Government continue working in the spirit of Bill C-464 to correct the current problem.

The cost of helping multiple birth families is easily manageable. Multiple Births Canada estimated the cost of Bill C-464 to be \$26.5 million per year in 2013, while the Parliamentary Budget Office arrived at a cost of \$40 million per year. That was the cost of giving parents of twins a second 35 weeks at the full rate. Given that the number of triplets and beyond is very small, the added cost of fully implementing the per child system would be approximately the same amount. In a \$22 Billion per year EI program in 2014, such an investment is well worth the cost.

The suggested change to EI Parental Benefits in this current consultation is insufficient for the multiple birth community and does not correct the underlying unfairness of the scheme for multiple birth families. While extending the benefit period to 18 months will help many families that can afford living with the lower payments that are associated with the extension, parents of multiple births will still get short changed in the process of caring for their new children and many parents will struggle to make ends meet. Allocating 35 weeks of full benefits per child would go much further in helping our community and would contribute towards putting us on an equal footing with the vast majority of families that have one new baby at a time.

Multiple Births Canada would be pleased to meet with you to discuss this matter further. You are also welcome to visit our website to learn more about our organization and multiple births <http://multiplebirthscanada.org>. Thank you for your time and consideration in this matter. We look forward to hearing from you to discuss these issues further, and trust that our input will be considered in making effective changes to the existing programs.

Sincerely,

Heather McAuley, Chair

On behalf of the Board of Directors

Multiple Births Canada

