



ENSURING HOUSING RIGHTS FOR MIGRANTS IN NEW BRUNSWICK

BY AMY FLOYD, ADITYA RAO AND TRACY GLYNN



MADHU VERMA
MIGRANT JUSTICE CENTRE

APRIL 2024

Madhu Verma Migrant Justice Centre
madhucentre.ca | info@madhucentre.ca
ISBN: 978-1-7383657-0-8

The Madhu Verma Migrant Justice Centre is an organization dedicated to advancing migrant justice in New Brunswick.

This report is available at madhucentre.ca. Help the Madhu Verma Migrant Justice Centre continue our migrant justice research by donating to the centre. To donate, visit madhucentre.ca or email info@madhucentre.ca.

About the authors

Amy Floyd is the Housing Justice Coordinator for the Madhu Verma Migrant Justice Centre. Aditya Rao is a human rights lawyer, housing advocate and founding director of the Madhu Verma Migrant Justice Centre. Tracy Glynn is a founding director of the Madhu Verma Migrant Justice Centre and member of the Migrant Workers in the Maritimes research team.

Funder

This research report was funded by the Catherine Donnelly Foundation.



TABLE OF CONTENTS

Executive Summary	2
Glossary of Abbreviations	3
Introduction	4
Context	6
Methodology	9
Findings and Recommendations	10
Migrant Workers	10
International Students	13
The Undocumented	14
Conclusions	16
References	17

EXECUTIVE SUMMARY

New Brunswick is experiencing a housing crisis. Migrants are often excluded from public conversations about the housing crisis and when they are included, they are blamed for a crisis they did not create (Hussan, 2023; Rao and Glynn, 2022). Temporary foreign workers at the province's seafood processing plants report living in overcrowded and unsafe conditions (Bejan et al., 2023). International students cannot find affordable housing in the province's cities. In September 2023, University of New Brunswick graduate student Pawan Kumar told CBC his search for housing in Fredericton has been "devastating" (Rudderham, 2023). Meanwhile, the undocumented, those without status to be in the country, are forced to live in the shadows and treated as less than human.

While housing is a challenge for many people in New Brunswick, in need of immediate attention, certain groups of newcomers – temporary foreign workers, international students and the undocumented – in the province face unique housing challenges. Their struggles and needs are the focus of this report.

In 2023, the Madhu Verma Migrant Justice Centre conducted the Housing Justice is Migrant Justice Project with funds from the Catherine Donnelly Foundation. Part of this project included researching and writing this report. In this report, we contextualize the housing situation facing migrant groups in New Brunswick and look at how we can improve housing for migrants and all people in the province.

Based on desk research and conversations with temporary foreign workers, international students, the undocumented, and their advocates in 2023 and 2024, the report concludes that migrant housing in New Brunswick is inadequate, unsafe and unaffordable.

Migrant advocates agree that the best way to ensure the rights of migrants are protected and that they have access to housing and essential social services is through granting permanent residency to temporary residents. In 2021, migrants won a major victory when Prime Minister Justin Trudeau's mandate letter for the Minister for Immigration, Refugees and Citizenship called for a plan for regularizing migrants without status. The Canadian government has yet to accomplish this. In fact, Canada has deported 104 per cent more people since the 2021 announcement (Migrant Rights Network, 2023).

The Madhu Centre, migrant advocates and other coalitions and associations like the Canadian Health Coalition (2022), the Canadian Bar Association (2023) and media outlets like The Toronto Star (2022) have called for regularization of the status of the undocumented already in the country to protect people from abuse, violence and exploitation. As we prioritize advancing this systemic solution, we also recommend that governments implement a series of immediate reforms to realize the housing rights of migrants in New Brunswick.

Our report calls on all levels of government to rethink their approach to affordable housing by refocusing efforts towards non-market housing.

We ask the federal government to uphold the right to housing for all, and strengthen and enforce national housing standards for migrant workers. We also demand an end to the closed work permit system that traps workers in unsafe working and living conditions.

We recommend the province of New Brunswick more robustly inspect the housing of employer-provided migrant worker housing to catch and prevent violations, extend inspections of residences where in-home caregivers and live-in-caregivers work, and ensure the undocumented have access to the provincial rent bank.

To truly ensure the progressive realization of the right to adequate housing for all, New Brunswick must put in place basic protections for everyone – this includes a robust rent control regime and eviction protections for tenants across the province.

GLOSSARY OF ABBREVIATIONS

CFS	Canadian Federation of Students. Canada's largest and oldest student federation, representing 500,000 post-secondary students across the country.
CMHC	Canada Mortgage and Housing Corporation. Canada's national housing agency tasked with supporting access to quality, affordable housing.
ESDC	Employment and Social Development Canada. A department of the Government of Canada responsible for migrant worker programs, including the Seasonal Agricultural Worker Program and the Temporary Foreign Worker Program.
IRCC	Immigration, Refugees and Citizenship Canada. A department of the Government of Canada responsible for matters dealing with immigration to Canada, refugees, and Canadian citizenship.
LMIA	Labour Market Impact Assessment. A document that an employer in Canada may need to hire a temporary foreign worker. A positive LMIA will show there is a need for a foreign worker to fill the job, and that no Canadian worker or permanent resident is available to do the job.
Madhu Centre	Madhu Verma Migrant Justice Centre. A non-profit organization registered with the province of New Brunswick dedicated to supporting migrant workers and others with precarious immigration status in New Brunswick.
OECD	Organization for Economic Co-operation and Development. An intergovernmental organization, comprising a membership of mostly high-income nations, committed to promoting free market solutions and international standards related to social, economic and environmental problems.
UNB	University of New Brunswick. The province's largest public university, with two primary campuses in Fredericton and Saint John.

INTRODUCTION

Migrants in New Brunswick experience housing challenges in similar, but also unique ways as other residents. Canada can deport migrants for a variety of reasons.

Migrants discussed in our report include those with a temporary work, study or residence permit, and the undocumented. The undocumented are especially vulnerable to exploitation, including wage theft and labour trafficking in the form of coerced labour and housing. Labour trafficking is occurring in New Brunswick, and trafficking being experienced by migrant workers in Canada is on the rise (FCJ Refugee Centre and the Canadian Centre to End Human Trafficking, 2023).

New Brunswick's rent control policies have been criticized as ineffective. After abandoning the 2022 temporary rent cap, in 2023, New Brunswick required rent increases above the inflation rate to be spread over multiple years but, according to the government's most recent interpretation of the policy, that is no longer the case. The protection against excessively high increases is no longer automatic. Tenancy officers take a case-by-case approach to decide whether tenants facing rent increases that exceed inflation qualify to have them phased in, which has been opposed by tenant and anti-poverty groups like ACORN New Brunswick (Jones, 2024).

Housing was once treated as a social good in Canada but in the last 40 years, housing has been left to the market (Tranjan, 2023). All levels of governments have failed to fund, build, and acquire adequate numbers of affordable rental units. Governments have consistently weakened tenant protections, allowing landlords to profit handsomely from limited or no caps on rent increases (Macdonald and Tranjan, 2023).

Supply-side solutions to the housing crisis are being pushed by lobbyists for investors, for-profit companies, and real estate investment trusts. Multi-billion dollar funding agreements from the federal government have benefited these companies immensely to create largely unaffordable housing (Cuthbertson and Luck, 2021). Meanwhile, non-profit housing and co-operative housing, despite consistently providing permanent affordability, do not receive the support they need.

All governments – federal, provincial, and municipal - must ensure its residents are housed. However, Canada's social housing at 3.5 per cent of total housing stock remains at half the OECD average of 7 per cent (Young, 2023).

Governments need to invest in the building of the required numbers of affordable housing units needed, but they also need to enact and enforce sound legislation that makes access to housing more equitable and just. The province's *Residential Tenancies Act* needs to be modernized to enhance protections for all tenants, including special protections for migrant tenants to recognize their unique situations, such as in cases where their landlord may also be their employer.

The policy recommendations in this report are based on the premise that everyone should be guaranteed the right to safe, affordable, and dignified housing.

Housing is generally considered affordable when an individual spends no more than 30 per cent of their income towards it. The Canadian Centre for Policy Alternatives (CCPA) has developed the measure of a rental wage, which captures housing affordability by examining the relationship between wages and rents by calculating the hourly wage required in a given jurisdiction to afford rent for an average 2-bedroom apartment when working a standard 40-hour week and spending no more than 30 per cent of one's income on housing (Macdonald and Tranjan, 2023). In other words, the rental wage is how much people need to earn to pay rent without spending too much of their income on it.

In Canada, the rental wage is considerably higher than minimum wage in every province. In 2022, New Brunswick's minimum wage was \$13.75 while the rental wage for a one-bed apartment was \$16.38, and for a two-bedroom apartment, it was \$20.40 (Macdonald and Tranjan, 2023). In May 2023, minimum wage in New Brunswick increased to \$14.75 an hour and increased to \$15.30 on April 1, 2024 (Post-Secondary Education, Training and Labour, 2024), still below the 2022 rental wages.

It is also worth noting that New Brunswick has the second-highest rate of food insecurity of the ten provinces. This rate increased from 2021 to 2022 (Urquhart, 2023). Since at least 2022, laid off migrant workers at the province's seafood processing plants have been turning to food banks to eat (Radio-Canada, 2022). The combination of poor nutrition and poor housing situations create the conditions for long-term population-wide negative health outcomes.

Without affordable, safe, and stable housing, no one can excel in the rest of their lives. The Canadian Mental Health Association (2023) notes that inadequate housing affects the mental health of individuals as well as an entire community's well-being. Migrant tenants are especially vulnerable. Migrants are constantly adapting to new situations, meeting bureaucratic requirements, and cultural norms; they need a place to return home, where they can rest and feel secure.

Why focus on housing for migrants?

- Temporary foreign workers under the Seasonal Agricultural Workers Program live in employer-provided housing. Many other temporary foreign workers are tenants who pay rent to their employer or a landlord who is connected to their employer.
- Migrant workers on closed work permits are fearful that they may not be invited back to work in Canada the following season. Such fears stop them from speaking out against landlords and employers who violate their rights.
- International students, like other tenants, are not able to find affordable housing in an environment where landlords have been allowed to increase the rent year after year.
- Migrants often face racism and xenophobia. They may not speak French or English.
- Migrants in untenable situations often tell us that they don't want to complain and seem ungrateful.
- Undocumented people may not be able to demand a lease from a landlord or access social supports. It is not uncommon for undocumented people to be forced to share someone else's bank account to receive pay cheques and pay bills. Many migrants lack Canadian credit history or proof of funds needed for rental agreements and utility set-ups. All of these factors make migrants vulnerable to exploitation by others, more likely to live in substandard housing, and less able to exercise their rights.

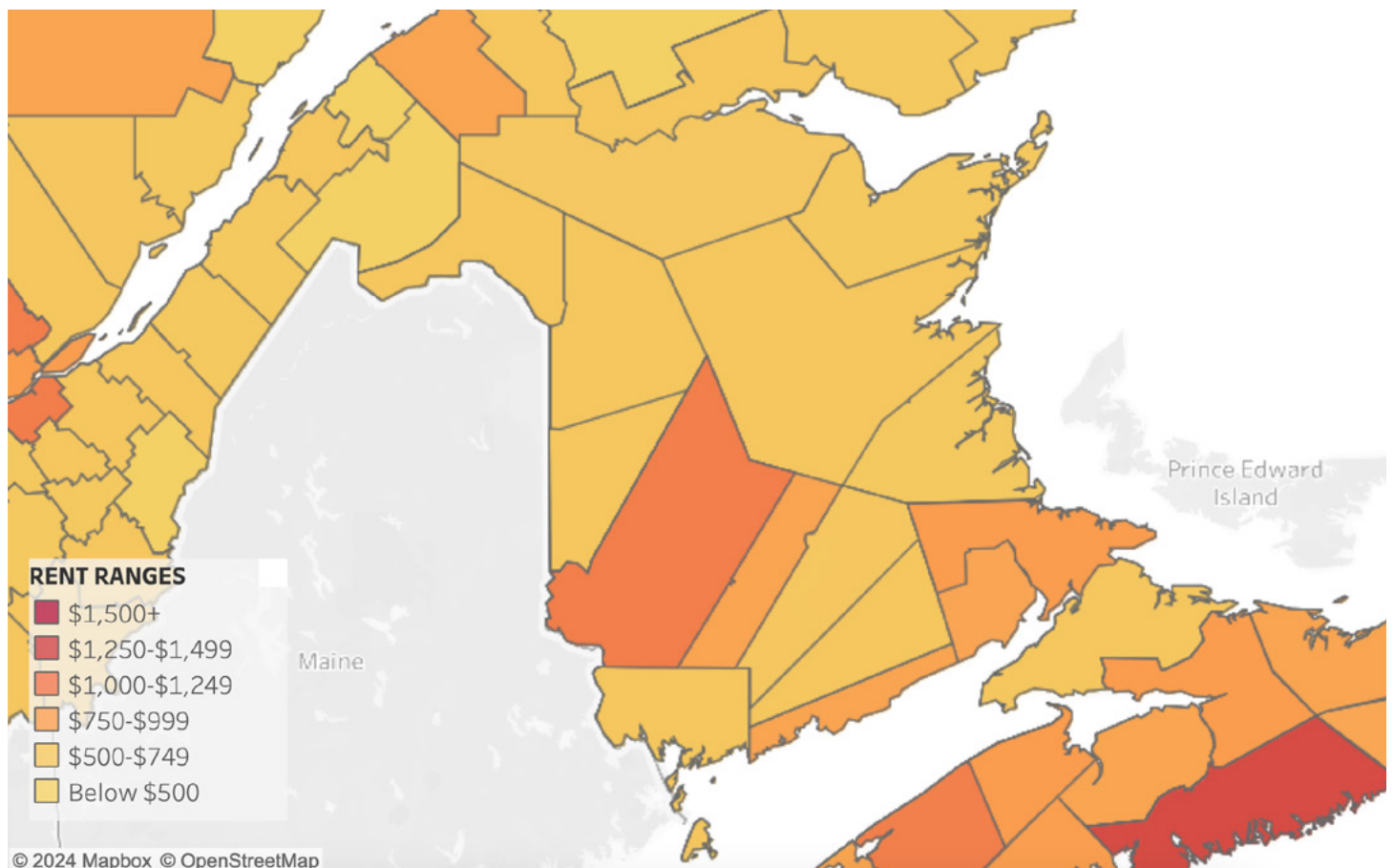
In 2019, Canada passed the *National Housing Strategy Act*. The Act enshrines the human right to housing in law by declaring it to be the housing policy of the Government of Canada. The Act also commits Canada's National Housing Strategy to focus on improving housing outcomes for those in greatest need.

This report details how migrants in New Brunswick are in great need of their right to adequate housing being protected. It is hoped that the information and recommendations made in this report inform the national housing strategy as well as provincial and municipal housing plans.

CONTEXT

There are 87,600 tenants in New Brunswick, five per cent of them live in overcrowded conditions and eight per cent of them living in housing that needs repairs. Average monthly rent and utilities in the province are \$869 (Canadian Rental Housing Index, 2024). The average rent for a one-bedroom in Fredericton went from \$786 monthly in 2019 to \$951 in 2022. In Moncton, the city with the fastest growing population, it went from \$713 up to \$926 in the same timeframe (Statistics Canada, 2023a). Twenty-eight per cent of New Brunswick tenants are spending more than 30 per cent of their income on housing and utilities, compared to 33 per cent of Canadians while 8 per cent of the province's tenants are spending more than 50 per cent, compared to 13 per cent of Canadians (Canadian Rental Housing Index, 2024).

While immigrants are the convenient scapegoat for the housing crisis (Hussan, 2023), housing unaffordability can be traced to Real Estate Investment Trusts (REITS) and corporate landlords increasingly “repositioning” units. The investors and firms purchase aging affordable housing stock and either demolish it for new builds or renovate it into unaffordable luxury units. Matthew Hayes, Canada Research Chair on Global and Transnational Studies and spokesperson for the New Brunswick Coalition for Tenants Rights, found that, through repositioning, one REIT alone could negate all of the New Brunswick Housing Strategy's goal of creating 1,262 new affordable units this decade (Hayes, 2021). In 2020, just under one in three properties in New Brunswick (29 per cent) were owned by investors. This means that they do not use this property as their primary residence (Fontaine and Gordon, 2020).



Cost of rent plus utilities including heat, hot water and electricity

Source: Canadian Rental Housing Index, 2024.

The Saint John Human Development Council's 2021 report, *Point-in-Time Homelessness Count for Fredericton, Moncton, and Saint John*, stated that the number one reason for homelessness was rents that were too high (78 per cent), followed by income being too low (65 per cent). Tenants said the top reasons for losing housing were conflict with someone else in the home (28 per cent), insufficient income (21 per cent) and conflict with their landlord (19 per cent). Rent control is clearly one policy tool that can help keep people housed. Investing in affordable housing is another.

An analysis of census data shared by the New Brunswick Coalition for Tenants Rights shows that New Brunswick lost over 8,600 affordable housing units between 2016 and 2021. The vacancy rate for Saint John dropped from 3.4 per cent in 2018 to just 1.3 per cent in 2022 (Statistics Canada, 2023b).

Moving can be difficult for anyone in the best of circumstances, but those with low incomes can face extreme housing precarity. People with disabilities that require fully accessible housing may have to wait years to find suitable units where they can safely live an independent life.

In October 2022, the Department of Social Development announced that the government of New Brunswick would spend \$100 million to build 380 new social housing units and \$2.2 million to renovate 110 existing units that are currently unlivable. The department said there were 8,700 applicants waitlisted for social housing at that time. The New Brunswick Coalition for Tenants Rights (2023) says that the necessary investment for social housing alone will be \$2.6 billion.

The Madhu Verma Migrant Justice Centre (2023) welcomed the establishment of a rent bank in New Brunswick in late 2023. While migrant workers were initially largely excluded, eligibility criteria were revised to include those with a permit to live and work in the province. Undocumented people, however, remain excluded.

Discrimination in housing in New Brunswick exists for racialized communities and for tenants with children. Racialized people (including migrants) live in higher levels of poverty. Census data from 2021 shows that 1 in 3 racialized children are living in poverty in New Brunswick, twice the national rate (Human Development Council, 2024). According to the Human Development Council, "Heightened poverty rates for children and families in racialized groups result from systemic and structural racism. These refer to racial discrimination that is pervasive and deeply embedded within systems, laws, policies, and programs. They perpetuate the marginalization and oppression of racialized people in society" (Page 29).

Maria Fernandez Lopez, a refugee claimant from Colombia in Quebec, told CBC in 2023 that when her husband would talk to the landlords or tenants over the phone, they were very friendly, but the moment they met in person, "their demeanours would change and they would come up with excuses for not renting them the apartment. In one instance, the landlord told us outright that he did not rent to refugees" (Amador, 2023). Racialized migrants have shared similar stories to the Madhu Centre.

Advocates have also raised alarm about the *Safer Communities and Neighbourhoods Act* (SCAN Act). In place in New Brunswick since 2009, the Act fast-tracks evictions on the basis of complaints regarding suspicions of criminal activity to a tipline. Based on evidence brought forward by the government department in charge of the tipline – not the police – a judge can order an eviction even if no criminal charges were laid. The judge may also shut down a building for up to three months, potentially affecting many residents in units that were not involved in the order (Department of Justice and Public Safety, 2023).

In 2013, a judge overturned two social housing eviction notices, citing a shoddy investigation by the SCAN team. Social Housing tenants were not told that they had the ability to appeal the order (Ibrahim, 2021). Advocates fear that the tip line may be used wrongfully by residents to control neighbours that they deem to not "fit" in their community. It can be used to further discriminate against already racialized and marginalized communities (NB debrief, 2022).

Besides racial discrimination in housing, other forms of discrimination exist in housing. Information collected by the government of New Brunswick's 2021 *Review of the Rental Landscape in New Brunswick* found that families with children are also being denied housing. An anonymous participant is quoted: "Not only is it hard to find an affordable home, but it's also hard to find one that will allow families. I was denied over 100x because I had kids" (page 21).

There is a need for more mechanisms to protect tenants from discrimination in all forms and to penalize landlords in violation of human rights law. Persistent delays at the Human Rights Commission mean that recourse is limited for human rights violations. Legal aid in New Brunswick does not cover landlord and tenant disputes under the *Residential Tenancies Act*. Legal aid in New Brunswick is restricted to criminal law, family law and public trusteeship (New Brunswick Legal Aid Services Commission, 2023). The Tenants Advocate service, run by the New Brunswick Coalition for Tenants Rights with funding from the Community Housing Transformation Centre (CHTC), provided legal information to tenants from 2021 to 2023. It was unable to continue after the federal government did not renew funding to the Community Based Tenant Initiatives fund operated by the CHTC.

METHODOLOGY

To gather information about the housing struggles and needs of various kinds of migrants in New Brunswick, we conducted desk research, including a review of legislation, policies, media, academic articles, and non-governmental reports. We also disaggregated information gleaned from the Madhu Centre's casework and our partners who support migrants and tenants in the province.

We noted a lack of publicly available migrant-specific housing information for New Brunswick. Establishing which government department had the responsibility for housing inspections for migrant workers was especially difficult, requiring several phone calls to various government departments and agencies.

A Temporary Foreign Workers Guide is found on the government of New Brunswick website (Immigration and Settlement in New Brunswick, Canada, 2024), but it requires registering an account that does not provide instant access to the resources. Not having this information easily accessible for migrant workers is a barrier, given that many workers have trouble navigating government websites, in languages they may not easily understand.

Accessing information about their rights on a website is not only difficult, but can also be dangerous, which is why the government of Canada has added information on how to quickly exit their webpage on open work permits for vulnerable foreign workers who are victims of abuse. The webpage also includes information for workers on what to do if their abuser monitors their computer (IRCC, 2022a). Migrant workers at a seafood processing plant in New Brunswick have told us and senators present at a Senate Committee on Social Affairs, Science and Technology meeting on September 10, 2023 in Moncton that their employer opens their mail and checks their phones.

Herein, we make a series of policy recommendations to all levels of government aimed at achieving housing justice for migrants in New Brunswick. These recommendations endeavor to honour what we are hearing from migrants who through their lived experiences are best positioned to tell us about their housing and how to improve their housing.

FINDINGS AND RECOMMENDATIONS

Housing is a challenge for many vulnerable groups in New Brunswick. Certain groups of newcomers – migrant workers, international students, and the undocumented – face unique housing challenges. Their struggles and needs are the focus of this report.

Migrant Workers

The number of temporary foreign workers in New Brunswick has increased in recent years, from 1,350 in 2020 to 4,420 in 2023 (IRCC, 2024a). Employment and Social Development Canada (ESDC) has housing requirements for the different migrant worker streams, including the Seasonal Agricultural Worker Program, Temporary Foreign Worker Program, Live-in-Caregiver Program and In-Home Caregiver Program. Employers of temporary foreign workers generally need to ensure that affordable and suitable accommodations, as defined by CMHC, are available for their workers (ESDC, 2023a).

Employers of seasonal agricultural workers must provide worker housing, either on-site or off-site, and free transportation from their housing to the worksite. Employers must also ensure that the occupancy rate for each unit does not exceed the maximum allowable occupancy rate defined by the CMHC (ESDC, 2024). CMHC uses the National Occupancy Standard, which defines suitable housing as having a maximum of two persons per bedroom when the people are married or a common-law couple. Other adults over the age of 18 should have a separate bedroom (CMHC, 2022). Notably, the inspection form for this housing does not have a maximum number of workers per house/bedroom or bathroom, but states that beds should be 18 inches apart (ESDC, 2023b). By enforcing the national occupancy standards in employer-provided housing, this would put an end to room sharing and bunk bed use, which is a common practice Canada-wide and one that workers told the Migrant Rights Network (2020) needs to end.

Besides ending overcrowded housing conditions, the Migrant Rights Network's 2020 survey of 453 migrant food and farmworkers from across the country noted that the workers also want a cap on workers per washroom, and more cooking appliances so that workers don't have to wait hours to cook a meal. They also wanted clean drinking water, hot water for showers, and adequate heating in winter and cooling in the summer. They also wished to live closer to amenities and services. Workers wanted greater privacy, more living space, and to be able to live with their families. They also noted permanent immigration status on arrival as a solution to their housing problems.

Deplorable housing conditions of migrant workers could be prevented through a more robust housing inspection system. To receive a Labour Market Impact Assessment (LMIA) that is needed to hire foreign workers, employers providing housing must have that housing inspected no more than eight months prior to the workers' arrival (ESDC, 2024). Advocates say that such an inspection system fails to catch and prevent housing violations. For instance, a building inspection that was completed in December could meet requirements, but if the roof leaked throughout the winter months and was not repaired, workers arriving in April may have to live in unhealthy conditions for the whole season. Migrant workers and advocates want unannounced inspections throughout the season so that employers do not know when to expect a visit (Bejan et al., 2023; Migrant Rights Network, 2020).

Inspections throughout the season should not depend on migrant workers filing complaints. Although ESDC provides an anonymous tip line for worker complaints, in situations where there are few employees, an employer may be able to deduce who called in the tip. In practice, it can be extremely hard to punish employers for making reprisals towards workers. The safest method for catching infractions is regular, unscheduled site inspections.

The Madhu Centre is aware of migrant workers at one seafood processing plant complaining to ESDC about their housing and workplace in 2023. The result: the employer was alerted of the date and time of the inspection and

told workers to clean the mold in their bathrooms before the inspectors arrived. Some workers reported being told that they would only be called back to Canada the following season if they did their part in preparing the homes for inspection. Months later, the outcome of the inspection has not been made known to the workers, and it is expected that the inspection did not result in any penalties for housing violations.

In 2021, Canada's Auditor General Karen Hogan drew attention to the failure of ESDC to properly inspect employer-provided housing of migrant workers during the COVID-19 pandemic. She reported problems in 88 per cent of all quarantine inspection reports conducted by ESDC in 2021. This included a failure to do inspections in a timely manner. In half of all inspections, workers were not interviewed about their living conditions (Office of the Auditor General of Canada, 2021; Tasker, 2021). Although limited research has been conducted on monitoring and enforcing housing standards, there is indication that inspectors may be doing remote or "paper-based" inspections on complaints (Tucker et al., 2021). Given this, it was not surprising that at the end of 2021, 100 per cent of all inspected employers were found to be compliant with housing standards (Office of the Auditor General, 2021). Meanwhile, a survey of migrant food and farmworkers from across Canada by the Migrant Rights Network (2020, page 37) paints a different housing reality:

It's hot in summer; when it rains it drips inside, and the basement leaks.

They don't let us to increase the heat of the house because they say is going to very expensive the bill, so we have cold inside the house.

8 people & 1 bathroom, old house that smells like mould & mildew. No washer or dryer.

The toilet doesn't have a door, only a curtain so when somebody is showering you can't use the toilet. Right now we sleep in a big hallway with 20 guys in bunkbeds. No privacy. No dryer so we can't dry our clothes when it rains.

Too crowded, lack of privacy. Isolated rural location. Next to chicken barns, so the smell & flies are inescapable.

Migrant workers not in employer-provided housing in New Brunswick, who pay rent to a landlord (sometimes to a landlord who is also their boss), have reported similar housing situations. With the assistance of Migrant Workers Alliance for Change, a group of workers displayed photos of their moldy and damaged living quarters at a meeting with the Senate Committee on Social Affairs, Science and Technology in Moncton on September 10, 2023 organized by the Madhu Centre.

Temporary foreign workers are not protected by the *Residential Tenancies Act* if they live in housing where employment is a condition for their tenancy. In a phone conversation with the Office of the Chief Medical Officer of Health, we were told that anonymous complaints can be made to their office about any rental housing in New Brunswick that may pose a risk to tenants, such as rodent infestations, black mold or lack of water and sanitary sewer services. We were informed that these standards would not cover things like number of workers per bedroom, distance between beds, or number of workers per bathroom, etc.

The Madhu Centre is aware of employers who lease buildings or units from landlords and then they sublet the units to workers. The Tenant and Landlord Relations Office notes that they do not administer the relationship between a tenant and person subletting. This puts migrant workers who are subletting in further precarity. In some cases, the workers do not have a rental lease agreement. There are also complaints coming from workers indicating that the total amount of rent collected from workers is far greater than the amount of rent the employer pays to the landlord, sometimes by thousands of additional dollars each month. Although this practice is illegal in some other jurisdictions, it is legal in New Brunswick.

Another group of migrant workers, in-home caregivers and live-in-caregivers, work in private residences, providing care either for children or for people with high medical needs. A home is their place of employment and yet, their workplace is not inspected in the same ways that other workplaces are inspected.

After reports of widespread abuse, as of 2014, in-home caregivers are no longer required to live in their employer's home (Mas, 2014). For low-wage, in-home caregivers, employers must ensure that suitable and affordable accommodation is available to them (ESDC, 2023c). Low wages, a lack of housing and transit options, combined with needing to work early morning and evening shifts, can make living with an employer the only feasible option for caregivers (ESDC, 2023c).

There were 15 live-in caregivers in New Brunswick in 2023, a record, up from 10 the year before (IRCC, 2024a). If the worker is living in the home of the employer, the employer must ensure that the worker must have a private and furnished bedroom with a lock and safety bolt on the inside. The bedroom must meet municipal building requirements and the provincial/territorial health standards. The caregiver cannot be charged for the accommodations. ESDC's powers of inspection are limited, where an inspector can only enter a private household with consent or with a warrant (Justice Laws Website, 2024). As of 2023, the live-in caregiver program has been closed to new applicants (IRCC, 2023b).

Private residences are not subject to inspection under New Brunswick's *Occupational Health and Safety Act* except when the work is carried out by an employee of a contractor. Depending on the employment relationship with an in-home migrant worker, the *Act* may not apply. Furthermore, New Brunswick's *Employment Standards Act* excludes workers in private homes from protections under the *Act* (Government of New Brunswick, 1982).

The gendered nature of care work, with women doing most of that work (Fudge, 2011), requires a gender lens to ensure safe housing of migrant care workers. When work happens in a private home, workers may be more vulnerable to harassment and other types of violence (Baines, 2009). There are no supervisors on-site to mediate conflict and no other employees to witness harassment or violence. Such residences should be subjected to inspections with a gendered lens, and should involve unannounced inspections and off-site interviews with workers to ensure they are safe.

The federal government must:

1. Ensure that all housing-related rules and regulations that apply to migrant workers are compliant with its own legislated commitment to the right to adequate housing.
2. Strengthen and enforce national housing standards that ensure dignified housing for all migrants in employer-provided housing. Inspections of employer-provided housing need to be unannounced and regular. Violators of housing standards should face stiff penalties and potential disqualification from accessing migrant worker programs.
3. Abolish closed work permits to give migrant workers greater freedom to leave unsafe working and living conditions.

The provincial government must:

1. Reform residential tenancies legislation to ensure basic human rights protections, including security of tenure, rent control and a fully-resourced residential tenancies tribunal to replace the current Office of Landlord and Tenant Relations.
2. Regularly inspect the housing of employer-provided migrant worker housing to ensure compliance with national housing standards. These inspections should be unannounced.
3. Provide in-home and live-in-caregivers with the same health, safety, and labour rights as all other types of workers. The *Employment Standards Act* needs to be amended to allow for inspections of private residences where in-home caregivers and live-in-caregivers work.

International Students

In New Brunswick, there are almost 3,000 international students studying each year at public institutions (Immigration and Settlement in New Brunswick, Canada, 2023). International students are also found in private, career college programs. The Canadian Federation of Students (CFS) (2022) notes that international students pay \$25,589 per year for a general arts degree in Canada; an amount close to four times more than domestic students. International students at the Fredericton campus of New Brunswick's largest university, the University of New Brunswick, pay \$20,640.50 for an undergraduate arts or science degree while domestic students pay \$9,205.00. International law students pay \$28,151.50 while domestic students pay \$16,348.00 (UNB, 2023a).

Against the backdrop of dwindling public funding, post-secondary education institutions are being pushed to rely on international students for revenue. Public funding of universities has not been restored to levels prior to when the Chrétien government slashed the funding in 1995 and 1997 (Martin, 2009). Instead universities have been allowed to extract more money in tuition and fees from students.

Many students and their families take on debt in the hope of creating a better life for their children through education. Instead of making life more affordable for international students through reducing tuition, the Canadian government has recently made it harder for international students by reinstating the cap on hours they can work to 20 hours, (after having briefly removed the cap during the COVID-19 pandemic). The government has also put in place a new rule to only allow students into the country who can show they have \$20,635 in their bank accounts, up from the previous \$10,000 requirement (IRCC, 2023a). The government of Canada said the changes are meant to protect international students. However, migrant advocates say the changes harm international students and call for their protection from soaring tuition fees and predatory landlords and employers.

On January 22, 2024, Canada announced it would be capping the number of international students to 360,000 country-wide. This was, ostensibly, to address the housing crisis (IRCC, 2024b). This cap means New Brunswick will receive 5,600 spots for international students (CBC, 2024). The New Brunswick Coalition for Tenants Rights and the Madhu Centre (2024) raised concerns that the cap scapegoats international students instead of addressing the real perpetrators of the housing crisis – speculative investors and financialized actors.

Recently, media reports have uncovered exploitative recruitment systems being used by private, career colleges across Canada. Many students are paying exorbitant fees and arriving in Canada to find that their program is offered only online. Some arrive to find that their enrollment has been deferred to the next semester because the program was full (Fifth Estate, 2022). Many of these international students are also arriving and finding no housing. They are living in overcrowded, unsafe and unhealthy spaces. Researchers at Sheridan College, a private college, noted housing is a problem for international students due to lack of familiarity with the housing market and regulations, lack of connections, and linguistic and cultural barriers (El Masri and Khan, 2022).

Universities across Canada have privatized their university residences in a blow to affordability (Revington and August, 2019). St. Thomas University in Fredericton sold one of its residences in 2018 citing “excess housing capacity” (Chisholm, 2018).

While living on-campus may seem like a more secure route for international students, it is not an affordable option for most. For example, at UNB's Fredericton campus, students in a double shared dormitory bedroom pay \$3,546 for the fall semester or \$886 a month. Several buildings do not have kitchen facilities and the school requires students to purchase a mandatory meal plan. The fall semester basic meal plan fee is \$700 a month (UNB, 2023b). In this particular example, living on-campus would cost students \$1,586 monthly. Facilities need to be designed with kitchen areas so that students are not forced to pay for meal plans.

Students require diverse housing options. Not all students are single and able to rent a room in a shared space. An international student stated in the Government of New Brunswick's 2021 *Review of the Rental Landscape in New*

Brunswick: "Being an international student with a family, I found it way too difficult to find an accommodation. Some of the landlords denied as they were not renting out to students and some others denied as they were not giving for families."

With tuition and rents soaring, international students in Canada are among those living in overcrowded, unhealthy, and unaffordable housing.

The federal government must:

1. Allow international students to earn more to meet their cost of living by not restricting the number of work hours.
2. International students of all economic backgrounds should be allowed to study in Canada. Canada should reverse its requirement that allows only international students with \$20,645 to study in Canada.

The provincial government must:

1. Eliminate tuition fees for all students. As a first step, the province should make housing more affordable for international students by lowering international student tuition.
2. Require post-secondary institutions to operate a minimum number of residences on a non-profit basis and ensure affordable rents for all students.

The Undocumented

People without valid immigration status to be in a country are known as the "undocumented."

The Migrant Rights Network (2022) explains why people become undocumented:

People become undocumented because of the failures of immigration policy. There is no access to permanent residency for most low-wage migrants in Canada, and only 60% of refugee claimants are accepted. Almost all undocumented immigrants in Canada were previously on a temporary authorization (work, study, refugee claimant permit). They reached a point where they could not get permanent residency and the federal government refused to renew their permits. They were faced with an impossible choice: either return to a country where they may face war, discrimination, climate catastrophe or no economic opportunities and leave communities, families and relationships in Canada OR stay without access to any rights and services and in daily fear of deportation. Those who stay become undocumented immigrants.

Undocumented people have the greatest challenge not only to find safe housing, but to access all services. Their lack of citizenship or immigration status to stay in the country means they are denied rights that should count as inalienable and deserving of every human being. However, as political philosopher Hannah Arendt, an exiled Jew denied her German citizenship, pointed out, "the right to have rights" (1973) is not evenly applied across all groups of people.

The undocumented often work illegally, under the table. Under threat of detention and deportation, undocumented people may go even further into hiding, taking themselves and their families further away from essential services. They are unlikely to call the police when they are in danger for fear of being reported to the Canada Border Services Agency and deported.

Specific housing challenges for the undocumented involve many not having the proper identification documents required to sign legal rental agreements. They may not be able to demand a lease from a landlord or access rental supports such as the province's new rent bank. They may be forced to share someone else's bank account to receive pay cheques and pay bills. Many migrants lack Canadian credit history or proof of funds needed for rental

agreements and utility set-ups. All of these factors make migrants vulnerable to exploitation by others, more likely to live in substandard housing, and less able to fight for their rights. Living with precarious immigration status is also linked to trafficking in Canada (Beatson et al., 2017).

The federal government must:

1. Regularize the immigration status of undocumented people in Canada. They are at the highest risk for exploitation and must be given permanent residence to ensure their rights are protected and they are physically safe.

The provincial government must:

1. Extend rental assistance such as access to the rent bank to all residents in New Brunswick, including the undocumented.
2. Ensure provincial government services do not share immigration information with police or federal border enforcement where there is no legal requirement so that undocumented New Brunswickers can access public services without fear of detention or deportation.

CONCLUSIONS

All levels of government need to rethink their approach to affordable housing by refocusing efforts towards non-market housing. Government funding that results in subsidies to for-profit corporations will only exacerbate the problem of financialization, which researchers have warned is the real cause of the housing crisis. Besides this, both federal and provincial governments need to implement reforms to guarantee the housing rights of migrants.

For migrant workers, the federal government must:

- Ensure all housing-related rules and regulations that apply to migrant workers are compliant with its own legislated commitment to the right to adequate housing.
- Strengthen and enforce national housing standards. The standards must ensure dignified housing for all migrants in employer-provided homes, including migrant care workers.
- Make inspections of employer-provided migrant worker housing unannounced and regular.
- To prevent violations of housing standards, violations should come with stiff penalties and disqualification from accessing migrant worker programs.
- Abolish closed work permits to give migrant workers the ability to leave unsafe working and living conditions.

The provincial government must:

- Reform residential tenancies legislation to ensure basic human rights protections, including security of tenure, rent control and a fully-resourced residential tenancies tribunal to replace the current Office of Landlord and Tenant Relations.
- Regularly and spontaneously inspect the housing of employer-provided migrant worker housing to ensure compliance with national housing standards.
- Provide in-home and live-in-caregivers have the same health, safety, and labour rights as all other types of workers. The *Employment Standards Act* needs to be amended to allow for inspections of private residences where in-home caregivers and live-in-caregivers work.

International students come to Canada and face hefty tuition fees while facing work restrictions, making it further impossible for them to afford safe accommodations. For international students, the federal government must:

- As a first step, the province should make housing more affordable for international students by not restricting their number of work hours.
- Reverse the decision to welcome only students with \$20,635 in their bank account.

The provincial government must:

- Eliminate tuition fees for all students. As a first step, the province should make housing more affordable for international students by lowering international student tuition.
- Require post-secondary institutions to operate a minimum number of their residences on a non-profit basis and ensure affordable rents for all students.

The undocumented in Canada are forced to live in the shadows, fearing deportation. To ensure that the undocumented are adequately housed, the federal government must:

- Regularize the immigration status of Canada's undocumented people.

The provincial government must:

- Extend the rent bank to all people residing in New Brunswick, including to the undocumented.
- Ensure government services do not share immigration information with police or federal border enforcement where there is no legal requirement so that undocumented New Brunswickers can access public services without fear of detention or deportation.

To ensure the right to housing for everyone, the provincial government must put into place a robust rent control regime and eviction protections for tenants.

REFERENCES

- Amador, M. (2023, March 2). Asylum seekers face hurdles, discrimination as they compete for housing in Montreal. CBC. <https://www.cbc.ca/news/canada/montreal/asylum-seekers-housing-1.6766077>
- Arendt, H. (1973). *The Origins of Totalitarianism* (Vol. 244). Houghton Mifflin Harcourt.
- Baines, D. (2006). Staying with people who slap us around: Gender, juggling responsibilities and violence in paid (and unpaid) care work. *Gender, Work & Organization*, 13(2), 129-151.
- Beatson, J., Hanley, J., & Ricard Guay, A. (2017). The Intersection of Exploitation and Coercion in Cases of Canadian Labour Trafficking. *Journal of Law and Social Policy*, 26(1), 137-158.
- Bejan, R., Allain, K., Glynn, T., & Soto Flores, P. (2023). *Unfree Labour: COVID-19 and Migrant Workers in the Seafood Industry in New Brunswick*. TFW Maritimes. https://tfwmaritimes.ca/pdf/Unfree_Labour-TFWMARITIMES-NB-2023.pdf
- Canadian Bar Association. (2023). Regularize the status of the undocumented already in Canada. <https://www.cba.org/Our-Work/cbainfluence/Submissions/2023/August/Regularize-status-for-undocumented-immigrants-alre>
- Canadian Health Coalition. (2022). Health coalition calls for permanent residence for all. <https://www.healthcoalition.ca/health-coalition-supports-permanent-residence-for-all/>
- Canadian Mental Health Association (2023, May). Housing and Mental Health. (May 2023). <https://ontario.cmha.ca/documents/housing-and-mental-health/>
- Canadian Rental Housing Index. (2018). Canadian Rental Housing Index. Interactive Affordability Maps – Housing by Province and Territory. <https://www.rentalhousingindex.ca/en/#intro>.
- CBC. (2024). Study Permits. <https://www.cbc.ca/listen/live-radio/1-25-information-morning-fredericton/clip/16043843-study-permits>
- CFS. (2022). Fairness for International Students Campaign. <https://www.cfs-fcee.ca/campaigns/fairness-for-international-students>
- Chisholm, C. (2018). STU announces sale of Forest Hill property. The Aquinian. <https://theaquinian.net/breaking-stu-announces-sale-of-forest-hill-property/>
- CMHC. (2022). *National Occupancy Standard: Supporting the design and evaluation of housing policies and programs*. <https://www.cmhc-schl.gc.ca/professionals/industry-innovation-and-leadership/industry-expertise/affordable-housing/provincial-territorial-agreements/investment-in-affordable-housing/national-occupancy-standard>
- CMHC. (2023a). *Identifying core housing needs*. <https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/housing-research/core-housing-need/identifying-core-housing-need>
- CMHC. (2023b). Prohibition on the Purchase of Residential Property by Non-Canadians Act. <https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/housing-research/consultations/prohibition-purchase-residential-property-non-canadians-act>
- Cuthbertson, R., and Luck, S. (2021, Sept. 15). Ottawa is lending billions to developers. The result: \$1,500 ‘affordable’ rents. CBC. <https://www.cbc.ca/news/canada/nova-scotia/rental-construction-financing-cmhc-loans-average-affordable-rent-1.6173487>
- Department of Justice and Public Safety. (2023). Safe Communities and Neighbourhoods (SCAN) Unit.

https://www2.gnb.ca/content/gnb/en/departments/public-safety/law-enforcement-and-inspections/content/safer_communities_and_neighbourhoods.html

Department of Social Development. (2023). *Social Assistance Rate Schedule A*.
https://www2.gnb.ca/content/gnb/en/departments/social_development/social_assistance/social_assistancerateschedules.html

El Masri, A., and Khan, N. (2022). *International Students' Lived Experiences: A Review of Literature*. Centre for Global Education and Internationalization.
https://source.sheridancollege.ca/cgi/viewcontent.cgi?article=1000&context=cgei_resources

ESDC. (2020). *Live-in-Caregiver Program: About the Process*.
<https://www.canada.ca/en/immigration-refugees-citizenship/services/work-canada/hire-permanent-foreign/caregiver-program.html>

ESDC. (2023a). *Program requirements for low-wage positions*.
<https://www.canada.ca/en/employment-social-development/services/foreign-workers/median-wage/low/requirements.html-h2.13>

ESDC. (2023b). *Form Detail*.
<https://catalogue.servicecanada.gc.ca/content/EForms/en/Detail.html?Form=EMP5598>

ESDC. (2023c). *Hire a temporary worker as an in-home caregiver: Overview*.
<https://www.canada.ca/en/employment-social-development/services/foreign-workers/caregiver.html>

ESDC. (2024). *Hire a temporary worker through the Seasonal Agricultural Worker Program: Program requirements*.
<https://www.canada.ca/en/employment-social-development/services/foreign-workers/agricultural/seasonal-agricultural/requirements.html>

FCJ Refugee Centre and the Canadian Centre to End Human Trafficking. (2023). *It Happens Here: Labour Exploitation Among Migrant Workers During the Pandemic*.
<https://www.canadiancentretoendhumantrafficking.ca/wp-content/uploads/2023/02/CCTEHT-%E2%80%93-Labour-Trafficking-Report-ENG-1.pdf>

Fifth Estate. (2022). *Sold a Lie*. CBC.
<https://gem.cbc.ca/the-fifth-estate/s48e03>

Fontaine, J. and Gordon, J. (2020). *Housing Statistics in Canada: Residential real estate investors and investment properties in 2020*.
<https://www150.statcan.gc.ca/n1/pub/46-28-0001/2023001/article/00001-eng.htm>

Fudge, J. (2011). Global care chains, employment agencies, and the conundrum of jurisdiction: Decent work for domestic workers in Canada. *Canadian Journal of Women and the Law*, 23(1), 235-264.

Government of New Brunswick. (1982). *Employment Standards Act: Chapter E-7.2*.
<https://laws.gnb.ca/en/ShowPdf/cs/E-7.2.pdf?random=1680619957701>

Government of New Brunswick. (2021). *Review of the Rental Landscape in New Brunswick*.
<https://www2.gnb.ca/content/dam/gnb/Departments/eco-bce/Promo/rentals-loyers/review-of-the-rental-landscape-nb.pdf>

Hayes, M. (2021). *New Challenges in New Brunswick's Rental Housing Market*. New Brunswick Coalition for Tenants Rights.
<https://www.nbtenants.ca/reits-and-new-brunswick>

Hussan, S. (2023, August 17). The media is blaming immigrants for the housing crisis. They're wrong. *The Breach*.
<https://breachmedia.ca/media-wrongly-blames-immigration-canada-home-prices/>

Human Development Council. (2021). *Everyone Counts 2021: Tri City Highlights from the New Brunswick Point-in-Time Homelessness Count*.
<https://sjhdc.ca/wp-content/uploads/2023/03/PiT-Count-Infographic-Tri-City-2021.pdf>

Human Development Council. (2024). *New Brunswick's 2023 Child Poverty Report Card*.
<https://sjhdc.ca/report/new-brunswicks-2023-child-family-poverty-report-card/>

Ibrahim. H. (2021, November 4). Bill would protect names of people whose suspicions lead to eviction of possible criminals. *CBC*.
<https://www.cbc.ca/news/canada/new-brunswick/safer-communities-neighbourhood-act-new-brunswick-1.6236742>

Immigration and Settlement in New Brunswick, Canada. (2023). *Hiring international students*.
https://www.welcomenb.ca/content/wel-bien/en/information_employers/content/hiring_students.html#:~:text=New%20Brunswick's%20public%20post%2Dsecondary,province%20or%20become%20Canadian%20citizens

Immigration and Settlement in New Brunswick, Canada. (2024). *Settlement services for newcomers*.
<https://www.welcomenb.ca/content/wel-bien/en/LivingSettling.html>

IRCC. (2017). *Humanitarian and compassionate grounds*.
<https://www.canada.ca/en/immigration-refugees-citizenship/services/refugees/claim-protection-inside-canada/after-apply-next-steps/refusal-options/humanitarian-compassionate-grounds.html>

IRCC. (2022a). *Open work permit for vulnerable foreign workers who are victims of abuse*.
<https://www.canada.ca/en/immigration-refugees-citizenship/services/work-canada/permit/temporary/vulnerable-workers.html>

IRCC. (2022b). *Undocumented Migrants – Update November 18, 2022*.
<https://www.canada.ca/en/immigration-refugees-citizenship/corporate/transparency/committees/cimm-nov-18-2022/undocumented-migrants.html>

IRCC. (2023a). *Revised requirements to better protect international students*.
<https://www.canada.ca/en/immigration-refugees-citizenship/news/2023/12/revised-requirements-to-better-protect-international-students.html>

IRCC. (2023b). *Live-in Caregiver Program*.
<https://www.canada.ca/en/immigration-refugees-citizenship/services/work-canada/permit/caregiver-program.html>

IRCC. (2024a). *Temporary Residents: Temporary Foreign Worker Program (TFWP) and International Mobility Program (IMP) Work Permit Holders – Monthly IRCC Updates - Canada - Temporary Foreign Worker Program work permit holders by province/territory of intended destination, program and year in which permit(s) became effective*.
https://open.canada.ca/data/en/dataset/360024f2-17e9-4558-bfc1-3616485d65b9/resource/9b20b866-de27-436c-bc1b-c5d470a25507?inner_span=True

IRCC. (2024b). *Canada to stabilize growth and decrease number of new international student permits issued to approximately 360,000 for 2024*.
<https://www.canada.ca/en/immigration-refugees-citizenship/news/2024/01/canada-to-stabilize-growth-and-decrease-number-of-new-international-student-permits-issued-to-approximately-360000-for-2024.html>

IRCC. (2024c). *CIMM – Asylum System Processing and Innovations – October 24, 2023*.
<https://www.canada.ca/en/immigration-refugees-citizenship/corporate/transparency/committees/cimm-october-24-2023/asylum-processing-innovations.html>

Jones, R. (2024, January 29). *N.B. tenants facing large rent increases lose automatic right to get them phased in*. *CBC*.
<https://www-cbc-ca.cdn.ampproject.org/c/s/www.cbc.ca/amp/1.7096544>

Justice Laws Website. (2024). *Immigration and Refugee Protection Regulations (SOR/2002-227)*.
<https://laws-lois.justice.gc.ca/eng/regulations/SOR-2002-227/page-27.html>

Macdonald, D. and Tranjan, R. (2023). *Can't Afford the Rent: Rental Wages in Canada in 2022*. Canadian Centre for Policy Alternatives.
<https://policyalternatives.ca/publications/reports/cant-afford-rent>

Madhu Verma Migrant Justice Centre. (2023). *Rent bank needs to include temporary foreign workers*.

Martin, R. (2009, November 9). Who Killed Canada's Education Advantage? *The Walrus*.
<https://thewalrus.ca/who-killed-canadas-education-advantage/>

Mas, S. (2014). Foreign caregiver reforms impose cap, make live-in requirement optional. *CBC*.
<https://www.cbc.ca/news/politics/foreign-caregiver-reforms-impose-cap-make-live-in-requirement-optional-1.2819800>

Migrant Rights Network. (2020). *Decent & dignified housing for migrant farmworkers*. Migrant Rights Network - Food & Farmworkers Working Group Submissions to Consultations on Mandatory Requirements for Employer-Provided Accommodations in the TFW Program, 2020.
https://migrantworkersalliance.org/wp-content/uploads/2020/12/MRN-Submission_-_Decent-Dignified-Housing-for-Migrant-Farmworkers.pdf

Migrant Rights Network. (2022). *Regularization in Canada Brief*.
<https://migrantrights.ca/wp-content/uploads/2022/07/MRN-Brief-Regularization-July-2022.pdf>

Migrant Rights Network. (2023). *Skyrocketing deportations*.
<https://migrantrights.ca/skyrocketing-deportations/>

NB debrief. (2022, March 11). New Brunswick's 'snitch line' under fire from critics [video]. *NB Media Co-op*.
<https://nbmediacoop.org/2022/03/11/nb-debrief-new-brunswicks-snitch-line-under-fire-from-critics-video/>

New Brunswick Coalition for Tenants Rights. (2023, May). *New Brunswick Lost Almost 9,000 Affordable Rental Homes Between 2016 and 2021*.

New Brunswick Coalition for Tenants Rights and the Madhu Verma Migrant Justice Centre. (2023, February 22). Advocates concerned international student cap causing harm, confusion.
<https://nbmediacoop.org/2024/02/27/advocates-concerned-international-student-cap-causing-harm-confusion-statement/>

New Brunswick Human Rights Commission (2023, May 26). Email communications.

New Brunswick Legal Aid Services Commission. (2023). *Menu of Services*.
www.legalaid-aidjuridique-nb.ca/home/

Occupational Health and Safety Act, SNB 1983, c O-0.2.
<https://www.canlii.org/en/nb/laws/stat/snb-1983-c-o-0.2/216199/snb-1983-c-o-0.2.html>

Office of the Auditor General of Canada. (2021). Report 13—Health and Safety of Agricultural Temporary Foreign Workers in Canada during the COVID-19 Pandemic.
https://www.oag-bvg.gc.ca/internet/English/parl_oag_202112_02_e_43966.html

Prime Minister of Canada. (2021, December 16). Minister of Immigration, Citizenship and Refugees Mandate Letter.
<https://www.pm.gc.ca/en/mandate-letters/2021/12/16/minister-immigration-refugees-and-citizenship-mandate-letter>

Post-Secondary Education, Training and Labour. (2016). *Coverage under the Employment Standards Act Discussion Paper*. Province of New Brunswick. Retrieved from
<https://www.welcomenb.ca/content/dam/gnb/Departments/petl-epft/PDF/Publications/ESACoverage-E.pdf>

Post-Secondary Education, Training and Labour. (2024). Minimum wage to increase April 1.
https://www2.gnb.ca/content/gnb/en/departments/post-secondary_education_training_and_labour/news/news_release.2024.01.0033.html

Rao, A., and Glynn, T. (2022, February 11). The struggles of newcomers and rural New Brunswickers are linked – despite what Irving newspapers sell you. *NB Media Co-op*.
<https://nbmediacoop.org/2022/02/11/the-struggles-of-newcomers-and-rural-new-brunswickers-are-linked-despite-what-brunswick-news-sells-you/>

Radio-Canada. (2022, July 29). Des travailleurs étrangers temporaires ont recours aux banques alimentaires. *Radio-Canada*.
<https://ici.radio-canada.ca/nouvelle/1902058/banque-alimentaire-travailleurs-contrat-usine-transformation-chomage>

Revington, N. and August, M. (2019). Making a market for itself: The emergent financialization of student housing in Canada. *Environment and Planning A: Economy and Space*. 52(5), 856-877.

- Rudderham, H. (2023, September 3). Expensive, hard-to-find housing troubles university students as school year begins. *CBC News*.
<https://www.cbc.ca/news/canada/new-brunswick/housing-troubles-university-students-1.6953688>
- Silberman, A. (2023, May 8). Asylum seekers based to New Brunswick left struggling to find help.
<https://www.cbc.ca/news/canada/new-brunswick/asylum-seekers-based-new-brunswick-struggling-roxham-road-1.6833405>
- Statistics Canada. (2023a). *Canada Mortgage and Housing Corporation, average rents for areas with a population of 10,000 and over*.
<https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=3410013301>
- Statistics Canada. (2023b). *Canada Mortgage and Housing Corporation, vacancy rates, apartment structures of six units and over, privately initiated in census metropolitan areas*. (March 17, 2023). Retrieved from
<https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=3410012701>
- Tasker, J.P. (2021, December 9). *Auditor general says federal inspectors ignored pandemic regulations for temporary foreign workers*. *CBC*.
<https://www.cbc.ca/news/politics/ag-foreign-farm-workers-pandemic-1.6279572>.
- Tenant and Landlord Relations Office. (n.d). *Assigning and Subletting*.
<https://www2.gnb.ca/content/gnb/en/corporate/promo/renting-in-new-brunswick/lease-information/assigning-subletting.html>
- Toronto Star Editorial Board. (2022, September 7). We should be seeking to protect undocumented residents. *Toronto Star*.
https://www.thestar.com/opinion/editorials/we-should-be-seeking-to-protect-undocumented-residents/article_96d29fda-ed90-5436-9902-658bf41c276a.html
- Tranjan, R. (2023). *The Tenant Class*. Between the Lines.
- Tucker, E., Marsden, S., & Vosko, L.F. (2021). *Flawed by Design? Federal Enforcement of Migrant Workers' Labour Rights in Canada: A Research Report*.
https://digitalcommons.osgoode.yorku.ca/scholarly_works/2932/
- UNB. (2023a). UNB Fredericton. 2023-2024 NEW Tuition & Fees (effective September 1, 2023).
https://www.unb.ca/finance/_assets/documents/financial-services/new/fred_ug_arts_ft_new.pdf
- UNB. (2023b) *Traditional Residence fee schedule 2023-2024*
https://www.unb.ca/fredericton/residence/_assets/documents/traditional-res-fees.pdf.
- Urquhart, M. (2023, May 15). N.B has second-highest rate of food insecurity of 10 provinces. (May 15, 2023). *CBC*.
<https://www.cbc.ca/news/canada/new-brunswick/food-insecurity-report-proof-1.6841567>
- Young, R. (2023, January 18). *Canadian Housing Affordability Units*. Scotiabank.
<https://www.scotiabank.com/ca/en/about/economics/economics-publications/post.other-publications.insights-views.social-housing--january-18--2023-.html>



MADHUCENTRE.CA



**MADHU VERMA
MIGRANT JUSTICE CENTRE**