



Know your Pay Equity obligations and deadlines

A reference guide for federally regulated
employers

Canadian Human Rights Commission

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Who do these obligations apply to?

All federally regulated employers in Canada must meet the same four main obligations under the federal Pay Equity Act. But not all employers have to follow the same deadlines.

Here is how it works:

If you are a federally regulated employer that had ten or more employees at the time the **Federal Pay Equity Act came into force on August 31st, 2021**, you must follow the main dates and deadlines associated with the four obligations below.

If you were a federally regulated employer consisting of ten or more employees **AFTER** the Federal Pay Equity Act came into force on August 31st, 2021, go to the table of alternative dates and deadlines that apply to you. Note that you must still follow the four main obligations below.

Your four obligations

Obligation 1

Develop a pay equity plan. Deadline for posting the final pay equity plan: **September 3rd, 2024**, or before.

- Follow the [requirements](#) for developing a pay equity plan.
- Post your draft pay equity plan and “Notice - Right to Provide Comments on the Draft Pay Equity Plan,” providing a **60-day** window for employee feedback. It is therefore recommended that employers aim to post the draft pay equity plan in their workplace by **May 2024** to address comments and review the draft pay equity plan.
- Post the final pay equity plan and the “Notice - Increasing compensation” on or before **September 3rd, 2024**. The final plan must consider employee input.

Obligation 2

Correct pay gaps by increasing compensation to female job classes. Deadline: **September 4th, 2024**, or the day after the final pay equity plan is posted.

- Note: Employers may be allowed to phase in these pay increases if they represent 1% of the employer's preceding year's payroll costs.
- **IMPORTANT:** The Act does **not** provide the Pay Equity Commissioner with the power to **waive interest amounts or extend the deadlines by which they must be paid**. This means that even if an extension for posting a final pay equity plan is authorized, increases in compensation, lump sums and interest payments are still calculated based on September 4, 2024.

Obligation 3

File an Annual Statement. Deadline: **June 30th, 2025** (and annually thereafter).

Obligation 4

Update your pay equity plan. Deadline: **September 4th, 2029** (and after that, at least once every five years).

Checklist for success

- If you are an **employer with *unique requirements** (e.g.: part of a group of employers; formerly under provincial jurisdiction; taking over an existing pay equity plan; or having received authorization from the Pay Equity Commissioner), [know your obligations](#).
- Establish a pay equity committee and/or engage employees in the process through effective communication, collaboration, and seeking consensus.
- Follow the [requirements](#) for developing a pay equity plan.
- Post notices and draft plans in your workplace as required.
- Consider employee comments before finalizing the pay equity plan.
- Allocate sufficient time and resources to the employees and/or the pay equity committee to effectively carry out the pay equity process.
- Remember: failure to pay increases on time will result in interest accruing.

Useful resources

- [Employer obligations](#)
- [Requirements for developing a pay equity plan](#)
- [Templates for notices and the pay equity plan](#)
- [Pay Equity Portal for authorization requests and requests for information](#)
- [Publications to support with understanding and technical implementation](#)
- [Online course about the Federal Pay Equity Act](#)
- [Legislative Guide](#)
- [Pay equity toolkit](#)
- [Pay Equity Act and Regulations](#)

Alternative dates and deadlines

If you became a federally regulated employer **AFTER** the Pay Equity Act came into force on August 31, 2021, here are your key dates:

Table 1: Federally regulated public sector employers and parliamentary institutions

ACTION	Average number of employees 10 to 99¹	Average number of employees 100 or more¹
Become subject to the Act on	April 1 of the year after the fiscal year in which the average number of employees was between 10 and 99	April 1 of the year after the fiscal year in which the average number of employees was 100 or more
Post Pay Equity Act notice by	60 days after becoming subject to the Act	60 days after becoming subject to the Act
Post final pay equity plan by	Three years after becoming subject to the Act	Three years after becoming subject to the Act
First pay equity adjustments due	The day after posting the final pay equity plan	The day after posting the final pay equity plan
Phase in increases by	The day after the eighth anniversary of the date on which the employer became subject to the Act (and five years after posting the final pay equity plan)	The day after the sixth anniversary of the date on which the employer became subject to the Act (and three years after posting the final pay equity plan)
Post the final version of the revised pay equity plan no later than	The fifth anniversary of the day on which the employer posted the final pay equity plan	The fifth anniversary of the day on which the employer posted the final pay equity plan
First annual statement no later than	June 30 of the calendar year after the employer has posted the final pay equity plan	June 30 of the calendar year after the employer has posted the final pay equity plan

¹ **Note:** Average number of employees between April 1 and March 31 of any year following fiscal year 2020 to 2021.

Table 2: Federally regulated private sector employers

ACTION	Average number of employees 10 to 99²	Average number of employees 100 or more²
Become subject to the Act on	January 1 of the year after the calendar year in which the average number of employees was between 10 and 99	January 1 of the year after the calendar year in which the average number of employees was 100 or more
Post Pay Equity Act notice by	60 days after becoming subject to the Act	60 days after becoming subject to the Act
Post final pay equity plan by	Three years after becoming subject to the Act	Three years after becoming subject to the Act
First pay equity adjustments due	The day after posting the final pay equity plan	The day after posting the final pay equity plan
Phase in increases by	The day after the eighth anniversary of the date on which the employer became subject to the Act (and five years after posting the final pay equity plan)	The day after the sixth anniversary of the date on which the employer became subject to the Act (and three years after posting the final pay equity plan)
Post the final version of the revised pay equity plan no later than	The fifth anniversary of the day on which the employer posted the final pay equity plan	The fifth anniversary of the day on which the employer posted the final pay equity plan
First annual statement no later than	June 30 of the calendar year after the employer has posted the final pay equity plan	June 30 of the calendar year after the employer has posted the final pay equity plan

² **Note:** Average number of employees between January 1 and December 31 of any year following calendar year 2020.