



February 24, 2020

Ministry of Economic Development, Job Creation and Trade
400 University Avenue, 4th Floor
Toronto, ON M7A 2R9

Submitted electronically

RE: Regulatory Amendments 422/17 – Ontario Immigration Act

The Residential Construction Council of Ontario (RESCON) is pleased to submit comments to the **Proposed Amendments to Ontario Regulation 422/17 (General)**, regarding Ontario's Immigrant Nominee Program (OINP).

While RESCON recognizes this pilot focuses on manufacturing in rural and northern Ontario, we view it as a major step in the right direction and are optimistic a similar pilot can be created to deal with similar employer recruitment and retention issues in residential construction in the GTA.

RESCON represents over 200 residential builders of high-rise, mid-rise and low-rise buildings in the province. Our goal is to work in cooperation with government and related stakeholders to offer realistic solutions to a variety of challenges facing the residential building industry, which in turn have wider societal impacts. The focus of RESCON's work is on technical standards; labour relations; industry research and innovation; health and safety; regulatory reforms; and training and apprenticeship.

The government's mandate of investing in infrastructure and building more housing is contingent upon having a sustainable workforce to do so. We believe the provincial government has made great strides in addressing the skilled trades shortage through better promotion of the many careers in the trades to, and through expansion of existing training programs.

The residential construction industry is currently facing labour shortages in many voluntary trades that will only worsen as current workforce retires in the coming five to ten years. The industry has traditionally relied on skilled immigrants to sustain its workforce. This trend began after the Second World War but has slowed in recent years which has intensified the labour shortage. These immigrants, who started as workers in the 1940's and 1950's, embraced Ontario's construction industry creating companies which now employ thousands of workers contributing to Ontario's economic growth. This success story has been repeated over the



decades with subsequent flows of skilled trades immigrants but is in jeopardy unless targeted immigration programs for residential construction are successfully implemented.

RESCON applauds the government's proposal of a regional pilot program to attract skilled immigrants to communities outside of the GTA in manufacturing sector jobs. However, the skill shortage across the province is all encompassing, and is reflected in BuildForce Canada data that shows in the GTA alone, the construction industry will have to recruit an additional 20,000 workers within the next decade to offset retirements. Province-wide, there will be a need to recruit 100,000 new construction workers over the next ten years to keep pace with increased demand and retirements.

Further, changes to the OINP must be tailored to the different skilled industries in Ontario. Each skilled industry is different (manufacturing, construction, culinary, forestry, etc.) and a customized approach to immigration is needed when addressing skilled labour in each. Within construction specifically, there are seven distinct sectors; Industrial, Commercial and Institutional; Sewer and Watermain; Roads, Heavy Engineering; Pipelines; Electrical Power Systems; and Residential.

Given this sectorization of the industry, a tailored approach to immigration is required. National Occupation Classification (NOC) codes, while a good start, do not offer a complete picture or take sectoral differences into account and should not be the only source of information considered when addressing skilled immigration recruitment to the construction industry. The distinction between voluntary and compulsory trades further differentiates the skilled trades within construction, as many trades within the residential construction industry are strictly voluntary trades.

RESCON supports concept of international student and foreign worker streams, but the current system needs to be updated to ensure the programs will have a positive impact on providing a steady construction labour force. For example, the structure of the residential construction industry in the GTA and specialization of work in the trades limits the accuracy of the Carpentry NOC. Specifically, the carpentry trade has undergone specialization in the residential construction industry with employers and their workers focusing on a sub-set of the trade (framing, interior finishing, concrete forming, etc.). As a result, recruitment and alignment with education programs proves a challenge.

RESCON commends the government's continuous effort in streamlining and making it easier for businesses to operate in Ontario, which is seen through the proposal's goal of removing administrative burdens to hiring foreign workers.



As part of addressing the skills shortage in Ontario, RESCON believes a greater focus should be placed on the Red Seal Program trades and improving inter-provincial mobility. Eliminating labour mobility barriers within Canada would significantly help the residential construction industry by allowing skilled workers from other provinces to more easily come to Ontario to work.

RESCON would be pleased to meet with the Ministry to discuss our submission and how industry and government can work collaboratively to improve the foreign worker system to make it beneficial for both employers and employees.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Lyall", is written over a light blue circular stamp.

Richard Lyall
President
RESCON

Copy to:

Walid Abou-Hamde, Ministry of Labour, Training and Skills Development