



February 19<sup>th</sup>, 2021

Hon. Chrystia Freeland  
Deputy Prime Minister and Minister of Finance  
Department of Finance Canada  
90 Elgin Street  
Ottawa, Ontario K1A 0G5

**RE: Building blocks to recovery in the construction industry**

The Residential Construction Council of Ontario (RESCON) is pleased to provide you and your government with our 2021 Federal Budget Submission. This letter details crucial steps that will ensure the construction industry remains a significant driver of the economy throughout the pandemic and beyond.

RESCON represents over 200 professional builders of high-rise, mid-rise and low-rise residential buildings in Ontario. 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.

**1) COVID-19 vaccines to essential workers and maintaining PPE supply**

The construction industry across Canada represents roughly 6 per cent of Canada's GDP. Throughout the COVID-19 pandemic, most sectors of construction were deemed essential, including residential. Uninterrupted residential construction work is vital to supporting Canada's housing supply – which is even more critical during a pandemic. In Ontario, COVID-19 cases in the residential construction sector have remained low, which is a result of swift collaboration from the onset with the provincial government to develop sector-specific guidelines. Our industry also made use of, and continues to promote, the COVID Alert app to track and trace cases of COVID-19 on and off jobsites. In addition, members are increasing their communication with workers, implementing enhanced screening, and methodically sanitizing and ensuring compliance with regulations and best practices. While this approach and measures help mitigate the spread of COVID-19, we strongly believe that vaccines are the strongest line of defence to ending the pandemic. To that end, it is crucial that Canada receives more vaccines and at a faster rate.

Personal protective equipment (PPE), specifically masks, are also integral to getting through the pandemic. The federal government should continue to maintain PPE supply chains throughout the remainder of the pandemic to ensure there is abundant supply for all Canadians, including construction workers.

**2) Improving mobility of skilled trades workers**

## **Immigration**

According to BuildForce Canada, within the next decade in Ontario alone, the construction and maintenance industry will need to hire, train, and retain almost 103,900 additional workers to meet labour demands due to retirements. Canada's housing goals are contingent upon having a sustainable workforce. The federal government plays a significant role in facilitating pathways into the construction skilled trades through immigration of skilled workers and temporary foreign worker programs. The Government of Canada is crucial in ensuring that policies are fair and equitable regarding trades equivalency testing for immigrants as well as language equivalency tests.

The construction industry has traditionally relied on skilled immigrants to sustain its workforce. Specifically, carpentry related trades including low and high-rise forming, concrete and drain, sewer and watermain installation and even bricklaying are statistically the most dependent on skilled immigrants.

RESCON is requesting that the federal government significantly increase the allocation number for Ontario's Immigrant Nominee Program to allow the province the flexibility to recruit for specific skilled trades occupations. We believe that that this increased allocation number should correspond with Ontario's growing population and the growing investment in Ontario's key industries. The province consistently meets its targets and demand for the Ontario Immigrant Nominee Program is growing. RESCON is also requesting that the federal government introduce a 'trusted employer program' within the Temporary Foreign Workers Program, which would reward compliant businesses with a streamlined process to hire workers – less paperwork, less delays, and a reduction of unnecessary costs.

## **Interprovincial mobility of Red Seal trades**

The mobility of skilled trade workers across provinces also supports Ontario's residential construction sector attract more workers to the industry. The Red Seal program certainly facilitates labour mobility, but there are key trades missing from the Red Seal list that are facing serious shortages in Ontario – specifically, tower crane operators as well as elevator installers and mechanics. A sustained labour force of these two sectors is increasingly crucial to the GTHA's construction industry as density increases and the demand for tall buildings rise. RESCON is requesting that the federal government continue harmonization of the skilled trades to allow for greater interprovincial mobility and strongly consider making tower crane operators and elevator installers and mechanics Red Seal trades.

## **3) Harmonization of building codes**

The harmonization of construction standards across Canada is a step in the right direction to streamlining and aligning technical requirements across Canada. However, the consultation process for the National Building Code (NBC) review could be improved, with considerations for provincial weighting based on construction activity. As it stands, smaller jurisdictions who currently employ the NBC have greater engagement and influence in the process while larger jurisdictions, such as Ontario and Quebec who deliver most of the new development and have their own unique building codes, are not well represented. RESCON is encouraging the federal government to ensure that the NBC harmonization



consultation process is fair and engagement across Canada is more reflective of jurisdictions that lead in construction activity and more specifically new housing.

A sustained supply of accredited building officials in the Province of Ontario is integral to delivering much needed housing units. RESCON is requesting that the federal government allow for the interprovincial recognition and transfer of accredited building officials through standardization of training, which is enshrined in the goals of the NBC harmonization process.

#### **4) Investment in municipalities to fund infrastructure projects**

Investing in infrastructure and public works (such as transit, water systems, roads, and bridges) is also crucial to Canada's economic recovery. As detailed in the Residential and Civil Construction Alliance of Ontario's (RCCAO) [budget submission](#), municipalities are crucial to infrastructure and public works projects. However, with the fiscal challenges facing municipalities, many are unable to support infrastructure and public works projects. RESCON supports the RCCAO's request urging the Government of Canada, in partnership with the Province of Ontario, to provide municipalities with financial assistance through a Safe Restart Agreement 2.0 or other 2021 funding mechanisms. Funding to municipalities will ensure that shovel-ready and state-of-good-repair (SOGR) projects can continue.

As stated previously, construction was deemed an essential industry across Canada and remained essential throughout the pandemic. The construction industry will lead Canada's post-pandemic economic recovery, however, vaccine and PPE supply, the supply of labour and funding to municipalities is crucial to ensuring a productive and fully operational industry. If you wish to discuss further, we would be pleased to outline in greater detail the key points discussed in our submission. We appreciate your time in reviewing our submission.

Regards,

A handwritten signature in black ink, appearing to read 'RL', is positioned above the printed name of the sender.

Richard Lyall  
President

Copy to:

Rt Hon. Justin Trudeau, Prime Minister of Canada

Hon. Dominic LeBlanc, Minister of Intergovernmental Affairs