



August 4, 2020

The Honourable Lisa Thompson
Minister of Government and Consumers Services
College Park 5th Floor, 777 Bay St,
Toronto, Ontario
M7A 2J3

Submitted electronically

RE: Elevator Safety and Availability Review, #20-MGCS012

Dear Minister Thompson,

RESCON is pleased to work with the undersigned coalition and submit this letter on enhancing availability in the Province of Ontario.

The Residential Construction Council of Ontario (RESCON) represents over 200 builders of high-rise, mid-rise and low-rise residential 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.

Ontario's economic activity and housing goals are directly impacted by the availability and accessibility of functioning elevators. As key pieces of infrastructure, Ontarians depend on elevators on a daily basis as they travel to and from their home, workplace, and throughout Ontario as a whole. This reliance will only increase as Ontario's population grows, growth plan intensification continues and as the population ages. Further, we must also consider how service disruptions impact those living with a disability and how other vulnerable populations are affected.

Below is a summary of our main points of feedback which were submitted for the review:

- The elevator industry in Ontario is dominated by a small number of international companies, meaning that elevator companies do not operate in the same competitive business environment as other parts of the construction sector. This has created a power imbalance where builders/developers (the elevator owners) have reduced ability to impact installation of new elevators or repair times. Penalties will therefore be borne by the owner and end users as elevator companies will pass on any costs associated with fines to them.



- To be effective in our collective efforts to improve elevator safety and availability, data is key. To that end, RESCON believes that having easily accessible and accurate information on the following will be crucial to policy development: the number of elevating devices in the province, the number of licensed mechanics/installers in the region and the number of people who have completed training at the college level to be an elevator mechanic and/or installer.

Your review is a step in the right direction, but more needs to be done to address the key concerns Ontarians have related to elevators. Specifically, RESCON is working with a coalition of associations, builders, not-for-profit housing suppliers, and other interested stakeholders in **calling for the creation of a multi-ministry roundtable.**

As outlined above, elevators are infrastructure that impacts millions of Ontarians daily. While we are not recommending all of these ministries attend the roundtable, it is important to note that elevators impact the work being done by most ministries including Children, Community and Social Services; Colleges and Universities; Economic Development, Job Creation and Trade; Education; Finance; Government and Consumer Services; Health; Heritage, Sport, Tourism and Culture Industries; Indigenous Affairs; Infrastructure; Intergovernmental Affairs; Labour, Training, and Skills Development; Long-Term Care; Municipal Affairs and Housing; Seniors and Accessibility; and Transportation.

In addition to the creation of multi-ministry roundtable, it is paramount to focus on the supply and demand of labour related to elevator installation and maintenance. Specifically, the elevator trade is unique for the following reasons:

1. It is formally considered part of the industrial sector, but elevating device mechanics also work in the construction sector.¹
2. Unlike other construction trades, once an elevator is installed there is considerable maintenance work required on an ongoing basis. This means that every new elevator installed in Ontario increases the service demand on elevating device mechanics.
3. The trade is regulated by the Technical Standards & Safety Authority (TSSA) but it is not a Red-Seal trade in Ontario, and as outlined by the Cunningham Review, has a complicated training and licensing structure.
4. The elevator industry is unique in construction as owners have limited choice with respect to the installation and servicing of elevators.

Further, as outlined by BuildForce Canada, the elevator trade is in high-demand and labour shortages reported in the elevator trade have consistently exceeded that of other trades. This is especially true

¹ <https://www.collegeoftrades.ca/trades-in-ontario>



when considering the last five to ten years with a focus on higher density residential construction in the GTA.

In partnership with the other undersigned association, builders, not-for-profits, and stakeholders we remain a committed partner in addressing the elevator issue in Ontario.

Thank you,

Richard Lyall

President
RESCON

On behalf of and in conjunction with the following organizations:



Ontario
Home Builders'
Association



St. Clare's





Copy to:

Hon. Monte McNaughton, Minister of Labour, Training and Skills Development

Hon. Todd Smith, Minister of Children, Community and Social Services

Hon. Raymond Cho, Minister of Seniors and Accessibility

Hon. Prabmeet Sarkaria, Associate Minister of Small Business and Red Tape Reduction