



April 27, 2020

Honourable Rod Phillips  
Minister of Finance  
Chair, Jobs and Recovery Committee  
Frost Bldg S, 7 Queen's Park Cres  
Toronto, ON M7A 1Y7

Dear Minister Phillips,

**RE: Ontario's Post COVID-19 Economic Recovery – Residential Constriction Industry**

The Residential Construction Council of Ontario (RESCON) would like to provide you and the Jobs and Recovery Committee with specific recommendations for consideration as part of the Province's post COVID-19 economic recovery.

RESCON would like to commend the Government of Ontario for its leadership in addressing the COVID-19 impacts in the province. We appreciate the balanced and appropriate way the Province has dealt with residential construction activity in Ontario. The approach undertaken by the government balances the health and safety of Ontarians as well as construction workers across the province, while at the same time ensuring that much needed housing is still provided for thousands of people.

As the Province continues to address the health and safety of Ontarians and begins to develop an economic path forward, there are three recommendations that should be considered regarding Ontario's residential construction industry. These include permitting earthwork to proceed, allowing site and land-servicing projects to commence or continue, and allowing shoring and excavation work to proceed. Many of the recommendations presented in this letter have been echoed by other industry groups including the Ontario Home Builders' Association (OHBA), the Building Industry and Land Development Association (BILD) and the Ontario Sewer & Watermain Construction Association (OSWCA).

RESCON and its members consider the health and safety of workers a top priority. We led the early development and implementation of COVID-19 protocols for residential construction sites. We have also implemented additional health and safety parameters to ensure that construction operations are maintained in a properly controlled work environment, including staggering shifts, maintaining physical distancing and any other measures that are necessary to meet Ministry of Labour requirements.



RESCON would like to make it clear that we appreciate the environment surrounding our recommendations to the Committee. Without question, public health and the health and safety of workers and their workplaces must be paramount. We believe that an economic remobilization and recovery would be wasted if it came at the expense of the people it is meant to help.

With that being said, the residential construction industry is a major economic driver for the region and the province. Even though some residential construction is continuing during the pandemic, it is imperative that as the government focuses on the economic recovery of Ontario, it considers ways to get all of residential construction, including new builds, back online as soon as possible. Ensuring an uninterrupted housing supply will be an essential component in getting Ontario's economy firing on all cylinders and providing necessary housing for thousands of Ontarians.

To that end, RESCON would recommend that the Province, when in a position to broaden the scope of essential activities consider:

**1. Permitting earthwork to proceed**

Earthworks are in many instances, the first mobilization of any type of site and without it, all future projects have the potential to be put on hold given that no other activity can occur until this stage is complete. Earthworks are typically done by operators in their own individual machines, separated in space well in excess of the current physical distance limitations.

**2. Allowing site and land-servicing projects to commence or continue critical infrastructure works on private lands**

Underground servicing the installation of storm water controls, water pipes, sanitary sewer pipes, road construction including curbs and sidewalk, landscape works, trails, parks and utilities (e.g., telecommunications, water, gas, electricity, etc.) are necessary for the activation of new homes and eventual occupancy of residents. Additionally, there is a public safety element that requires the maintenance or completion of those essential works.

**3. Allowing shoring and excavation work to proceed**

Government should consider permitting the commencement/continuation of any new, pending and existing below grade permits that are in place. Further, below grade construction work should be added to the list of essential services, recognizing that a safe and physically distant work environment can be maintained with the number of trades being limited on site, and that this stage is key for the continuance of the entire project.



It is important to note that the season for completing certain servicing, such as earthworks and roadworks in the region is short. Considering that it is already the second half of April, it is imperative that residential construction work commences as soon as the weather permits. Losing seasonal opportunities to get work done will only compound the economic and social impacts of our current crisis and would significantly delay the delivery of necessary homes for Ontarians. It could also impact whether certain projects proceed at all.

RESCON is looking forward to continuing working with the government as it steers Ontario through this challenging time. We appreciate the opportunity to comment and would be happy to address any questions that may arise from the above information.

Regards,

Richard Lyall  
President

Copy to  
Charles Lammam, Executive Director of Policy and Budget, Office of the Minister of Finance  
Daniel Gordon, Director, Budget and Fiscal Planning, Office of the Premier of Ontario  
Patrick Sackville, Director of Policy, Major Projects and Partnerships, Office of the Premier of Ontario