



July 23, 2021

The Honourable Ross Romano
Minister of Government and Consumer Services
5th Floor
777 Bay St.
Toronto, ON M7A 2J3

RE: Fall Red Tape Reduction Bill

Dear Minister Romano,

The Residential Construction Council of Ontario (RESCON) represents over 200 residential builders of high, mid, and low-rise buildings in the province, with a focus on the GTA. Our members build Ontario's communities, homes, and future. We are committed to providing leadership and fostering innovation in the industry through the following six core focuses: Training and Apprenticeship; Government Relations; Labour Relations; Health and Safety; Building Science and Innovation; and Building Code Reform and Technical Standards.

RESCON appreciates the opportunity to submit comments to you and your Ministry ahead of the release of the Fall Red Tape Reduction Bill, and present opportunities to remove red tape and unnecessary burden from residential construction sector. These opportunities include: streamlining and digitizing the development approvals process across the Province; removing barriers to accessing training and jobs in the skilled trades; and maintaining the extended hours of construction for COVID mitigation and increased efficiency.

1. STREAMLINE AND DIGITIZE THE DEVELOPMENT APPROVALS PROCESS

A Fall 2020 CANCEA [report](#) commissioned by RESCON showed the economic benefits to speeding up the development approvals process by adopting a comprehensive and centralized planning and development e-permitting system across the Province. Specifically, the report showed that [regions in Ontario](#) could see thousands of additional housing units and attract millions of dollars in additional jobs and investment. The GTA itself could see 100,700 additional housing units by 2040, with the City of Toronto seeing 21,100 additional units by 2025, if there was a reduction in delays to the approvals process by just six months and a 10-per-cent increase in investment.

While digitization of the approvals process is occurring in various Ontario municipalities, existing e-permitting platforms are siloed, fragmented, only focused on the process of a specific department within a municipality, rather than a holistic look at the entire development approvals process.

Through [One Ontario](#), a coalition of organizations including RESCON and Ontario Building Officials Association (OBOA), we have developed a proposal for a common Development Approval Data and Information Exchange Standard, a Central Review Platform and Central Analytics and Reporting Platform to be used by municipalities, Provincial Ministries, Conservation Authorities, and other approval agencies in Ontario for the development and permitting processes.

We are appreciative that the government has stated their support for streamlining and digitizing the development approvals process through One Ontario. However, we are no closer to a comprehensive policy and systems change. With ever growing housing demand exceeding supply, there is a need and

urgency to digitize the development approvals process. Learning from other advanced jurisdictions, we believe a data exchange standard to be a prerequisite to supporting digitized operations and addressing the growing unsustainable housing supply crisis. The crisis unchecked will stymie jobs and investment growth.

2. REMOVE BARRIERS TO ACCESSING TRAINING AND JOBS IN IN-DEMAND SKILLED TRADES

The government's prioritization of promoting the many careers in the construction skilled trades through increased marketing and awareness to high school students, guidance counselors, and parents, is appreciated and a step in the right direction to getting more young people interested in the skilled trades.

Maintaining and sustaining a skilled trades labour force is directly related to our ability to maintain housing supply in the province. The residential construction industry is comprised of dozens of specialized careers which are currently covered by 40 construction trades. Of these 40, the elevator trade is in high demand, as seen in recent BuildForce Canada [data](#).

Since 2019, we have been working with the MGCS and TSSA to ensure that elevator availability and maintenance is upheld throughout the province. We are encouraged by the recent announcement from the Ministry to implement penalties for non-compliance and mandating data collection and sharing of elevator outages. These two changes will enshrine greater accountability. However, more changes are needed.

For one, there are not enough elevator mechanics and installers in Ontario to meet the demand for high-rise residential units. While we understand the supply of skilled labour is housed with the Ministry of Labour, Training and Skills Development, we believe a multi-ministry collaborative approach is needed to address elevator safety and availability in Ontario fully. As you know, elevators are a unique sector in how they are regulated and in the fact that the mechanics that install elevators are also the mechanics that maintain them. Therefore, they are one of the few trades that create their own work and the demand for elevators will steadily and constantly increase. Further, the trade is regulated by the 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.

3. MAINTAIN THE EXTENDED HOURS OF CONSTRUCTION ACROSS THE PROVINCE

To build and deliver much needed housing in a timely fashion, RESCON fully supports the continuation of the Extended Hours of Construction (ONTARIO REGULATION 130/20) until we reach a point where the health situation does not require pandemic measures on site or, in the alternative, no earlier than 2022. The industry has struggled under COVID-19, however associated safety measures, including extended hours of construction has allowed us to keep producing essential shelter. Aside from lost productivity, ongoing and worsening supply chain issues have slowed construction and dramatically increased costs. This exacerbates a pre-existing and ongoing housing supply problem. This and other factors have continued to increase shelter costs.

The extended hours of construction put in place in April 2020 remedied certain effects, enabling project timelines were met while permitting physical distancing and staggered scheduling of trades – helping us further mitigate the spread of COVID-19 on-site. The extended hours of construction have

fundamentally allowed us to try and preserve productivity throughout the pandemic as well as ensure the health and wellbeing of our workers from a deadly virus.

Further, with municipalities and cities across Ontario launching campaigns and other initiatives to encourage re-opening and a return to in-person work and learning (for example the 'We're Ready Toronto' campaign), gridlock is poised to return. Maintaining the extended hours of construction from 6:00 a.m. to 10:00 p.m. will help mitigate a full return of gridlock.

To reiterate, we strongly believe that maintaining the extended hours of construction would significantly increase efficiencies on site and would help deliver housing supply faster.

Thank you for taking the time to consider our recommendations. We strongly believe addressing all three in the upcoming Fall Red Tape Reduction Bill will significantly remove unnecessary burden for our industry.

Please also refer to our submission dated July 14th, supporting the Inclusion of Delegation Recommendations in the Fall Red Tape Bill. This letter is in unison with the Ontario Professional Planners Institute's (OPPI) recommendations. For ease, we are resending that letter as well.

Thank you,



Richard Lyall
President
RESCON

Copy to:

Benjamin Levitt, Director of Stakeholder Relations, Minister's Office, MGCS

Thomas Staples, Senior Policy Advisor, Minister's Office, MGCS