

October 20, 2022

Ministry of Labour, Immigration, Training and Skills Development  
400 University Ave., 4th Floor  
Toronto, Ontario, M7A 1T7

*Sent electronically*

**RE: 22-MLTSD 012 – Proposed amendment to Ontario Regulation 422/17 (General), a Minister's regulation made under the *Ontario Immigration Act*, 2015 relating to the Ontario Immigrant Nominee Program (OINP)**

The Residential and Civil Construction Alliance of Ontario (RCCAO) is pleased to provide the Ministry with comments on proposed amendments to Ontario Regulation 422/17 relating to the Ontario Immigrant Nominee Program (OINP).

RCCAO is a unique alliance of key labour and management stakeholders derived from the residential and civil construction sectors. Working together to promote positive change, our members build the homes, transportation networks, water systems and other critical infrastructure that is significant to the living standards of Ontario residents and businesses.

Our members include the Greater Toronto Sewer and Watermain Contractors Association; Heavy Construction Association of Toronto; International Union of Operating Engineers, Local 793; Joint Residential Construction Association, LiUNA Local 183; Ontario Formwork Association; and Toronto and Area Road Builders Association.

RCCAO commends the focus that the Government of Ontario has placed on immigration, especially as it relates to the development of a long-term pipeline of skilled talent. This is an important undertaking as this decade will see the anticipated retirement of more than 86,000 construction workers in Ontario. Considering the projected volume of work, industry will need to hire, train, and retain almost 100,000 additional workers by the end of this decade. Domestic training and hiring alone will not offset these shortages. The labour supply shortage is one of the single biggest challenges facing the Ontario construction market, and if not addressed, can threaten our ability to build the critical infrastructure needed.

Canada's immigration system has disproportionately recognized immigrants with formal education, certificates, and language skills. This recognition has been enshrined and transferred to the OINP. The prioritization and focus of the immigration system is outdated and not reflective of the current demand for "hands-on" labour needs, which has grown steadily over the past two decades.

Specific immigration changes that RCCAO believes would make a positive impact to the labour supply include:

1. Improvements to the Ontario Immigrant Nominee Program

- A) Amending the Skilled Trades Stream within OINP to recognize NOC Level C and D occupations in construction. Specifically, workers with specialized skills sets in the CCW and carpentry trades who are not a registered apprentice or CofQ holder.
  - B) Recognizing work experience outside of Ontario.
  - C) Removing the cumulative paid full-time work experience (or the equivalent in paid part-time work) in Ontario requirement for the Skilled Trades Stream and the In-Demand Stream of the OINP.
  - D) Removing the requirement to be currently living in Ontario to be eligible for the Skilled Trades Stream of OINP, and the requirement to hold a valid work permit at the time of application to the OINP.
  - E) Reducing the language proficiency requirements in either English or French at a Canadian Language Benchmark (CLB) from level 5 to level 4.
  - F) Reassessing the 'scoring factors' for the in-demand stream on the OINP to best align with Ontario's current labour market needs with a focus on non-apprenticable trades/specialized skill sets.
2. Expanding the Ontario Immigrant Nominee Program and Increasing Provincial Control
- A) Continue to request that Immigration, Refugee and Citizenship Canada allocate 18,000 seats to the Ontario Immigrant Nominee Program
  - B) Increase Ontario's ability to determine immigration needs.

RCCAO understands the necessity for alignment between the federal and provincial immigration standards, however, the proposal to align the OINP with the federal requirement to meet Canadian Language Benchmark (CLB) 5 Level or above creates additional barriers for immigrants to come to Ontario and enter the construction industry. Particularly in the GTHA, the construction workforce is very ethnically diverse, with many workers fluent in a second language. That is why one of our key asks has been to lower the CLB requirement to make it easier to recruit workers from abroad with in-demand skills sets. Thus, RCCAO believes that an exemption for the construction industry for this proposal would be valuable for industry's efforts to attract workers from abroad.

RCCAO appreciates the opportunity to provide feedback and look forward to continuing our work with the Government of Ontario on this important industry matter.

Sincerely,



Nadia Todorova  
Executive Director