

December 19, 2025

Ministry of Labour, Immigration, Training and Skills Development
400 University Ave
Toronto, ON M7A 1T7

Sent electronically

RE: 25-MLITSD019 – Proposed amendments to regulations under the *Ontario Immigration Act, 2015* to redesign the Ontario Immigrant Nominee Program's (OINP) Streams

The Residential and Civil Construction Alliance of Ontario (RCCAO) is pleased to provide comments regarding the Ministry's proposed amendments to simplify and consolidate OINP program streams.

The OINP is an important element of the province's ability to attract and welcome newcomers. Despite the current slowdown in areas of the construction industry, it is critical that the government remains focused on industry's long-term workforce needs. The OINP is a key tool for Ontario as it faces the anticipated retirement of more than 86,000 construction workers in the province and the need to hire, train and retain almost 100,000 additional workers by the end of the decade. Reflecting the importance of long-term workforce predictability, [over the last 24 months](#), RCCAO has led an industry coalition of labour, management and subtrades that advocates for reforms of the immigration system to help address Ontario's labour needs.

RCCAO supports efforts to streamline and modernize the existing Employer Job Offer streams under the OINP to continue attracting and retaining foreign talent while improving access for both employers and workers. As part of these efforts, RCCAO supports the consideration of a dedicated pathway for construction trades workers, where union support could be used to validate work experience as an alternative to a permanent, full-time job offer.

As OINP improvements move forward, it is imperative that the construction and infrastructure industry remains a priority, particularly with respect to eligibility and prioritization processes for NOC 75110 and 75119. Ensuring that relevant OINP program streams and any future changes are not overly prescriptive and instead reflect the nuances and realities of the construction industry, is critical to successfully attracting and retaining foreign skilled trades workers in Ontario.

RCCAO commends the government's longstanding emphasis on skilled trades, which has led to positive outcomes in encouraging greater participation in these fields. RCCAO looks forward to continuing to work collaboratively with the Ministry and the

Government of Ontario to ensure this positive momentum continues, and that Ontario has the skilled workforce necessary to build the critical infrastructure and housing on which we all depend on.

Sincerely,



Nadia Todorova
Executive Director

Copy to:

- Victoria McFarlane, Director of Stakeholder Relations, Minister's Office, Ministry of Labour, Immigration, Training and Skills Development
- Caitlyn Drexler, Director of Policy, Minister's Office, Ministry of Labour, Immigration, Training and Skills Development