

November 29, 2010

Rod Cameron
Chair
College of Trades Appointments Council and Interim Board of Governors
College of Trades Appointment Office
700 Bay Street, Suite 1700
Toronto Ontario
M5G1Z6

RE: Apprenticeship Ratio and Compulsory Certification Review Processes and Criteria

Dear Mr. Cameron:

The Ontario Chamber of Commerce (OCC) is a federation of 160 local chambers of commerce and boards of trade in the Province of Ontario, representing 60,000 businesses of all sizes, in all economic sectors covering every area of the province. The OCC's mandate is to advocate strong and effective policies on issues that affect its membership throughout Ontario's business community.

The OCC wholly supports the creation of an industry-led regulatory authority to govern the skilled trades in Ontario. Increasing the influence of owners and trades people in setting the parameters of apprenticeship training will allow the Ontario system to benefit from these groups' firsthand knowledge of the variables in each sector, making the apprenticeship system more responsive to the changing economic context.

That said, we would like to enumerate the areas in which we feel the proposed apprenticeship ratio and compulsory certification criteria and processes can be improved upon. With respect to the proposed decision making processes, the Ontario College of Trades and Apprenticeship Act, 2009 stipulates that the Appointments Council must consider a range of factors in creating the College's governance structure, including the geography of the province and representation from unionized and non-unionized and large, medium and small businesses. The OCC feels that the overarching intent to create a fair, balanced, and inclusive governance structure that creates a level economic playing field across the province must be maintained as far as possible in the review processes for ratios and compulsory certification. To this end, we would make a number of qualifications to the proposed decision-making processes:

- Once an application for compulsory certification is submitted, the application must be made public within a specific and fixed time period
- Of the employee and employer representatives on each review panel, there should be a balance of union and non-union affiliation; in addition, those considered for the third representative position should include representatives from the academic sector, public sector, or the general public; and where possible, consideration should be given to regional diversity and small, medium and large business sizes

- The Review Panel must be required to invite oral and/or written presentations by all interested parties (Applicant, other Trade Boards, members, non-members, unions, associations, the general public, etc.) through an open consultation process. This should not be left up to the Trade Boards, as is currently recommended in the consultation document. The College should mandate a minimum of 60 days for public consultation
- There should be a transparent method to track the degree of support for each view put forward during the public consultation process. All stakeholder input should be made publically available
- Decision-making processes must be rigorously evidence-based, assumptions tested, and analysis subject to stakeholder review. In the case of newly designated compulsory trades, no trade should be subject to a ratio until five years have passed and the full impact of compulsory certification on a trade can be measured.

We also feel that, as currently written, there are important elements missing from the criteria for determining ratios and compulsory certification. The proposed review criteria for ratios gives the Review Panel discretion to take into account factors related to labour supply, including sector and region. Employers have indicated that size also plays a critical factor in a company's ability to cope with mandatory ratios. In order to survive, smaller companies need to be able to perform multiple duties with limited staff, and many do not have the time or resources to sponsor apprentices. In such cases compulsory certification prevents small employers from obtaining qualified workers and creates an environment that favours large business over SMEs. In order to ensure that training requirements reflect the diverse capacities of employers, ratios must be adjustable by project size and contractor size, in addition to region and sector.

Factors such as sector, region, and size that can affect labour supply in the case of apprenticeship ratios are also relevant when it comes to compulsory certification. Employers, particularly those who have only small workforces or labour markets to draw on, rely on the flexibility inherent in the voluntary trades in order to remain competitive. In many instances, employees specializing in one trade perform multiple duties requiring a diverse array of skills and technical competencies. Carpenters, for example, do much more than build with wood. They install all types of resilient flooring, caulking, drywall, and acoustic ceilings. However, few if any of them have a formal certificate of qualification in all of the above. As is the case with many other voluntary trades, training primarily consists of supervised, hands on experience in the field.

In a certified training model, by contrast, a task can only be done by someone who has completed an apprenticeship program with a classroom training and an on the job component in the relevant trade. The more onerous training requirements restrict the ability of employers to optimize the existing labour supply. It is therefore imperative to include labour supply on the list of criteria for compulsory certification. When considering the relationship between compulsory certification and labour supply, the Review Panel must have the discretion to make determinations on the basis of sector, region, and project and contractor size. Taking into account these additional factors would allow the College to arrive at a much more complete picture of the impact of compulsory certification on Ontario's economic prosperity.

This leads to a broader issue with the apprenticeship system as currently structured. The skilled trades are not immune to the pressures for a more knowledgeable and adaptive workforce being felt by the rest of the economy. The complexity associated with today's economy has led employers in the skilled trades to place a higher premium on entry-level skills and continuous learning. As a result, many of the traditional lines of demarcation between the trades have been blurred, and many non-trades people are now performing some work elements historically performed by the trades. For example, toilet partitions and lockers may be claimed by three different trades based on the material they are made from and the extent to which they are pre-assembled. Given these dynamics, placing stricter limits on who can perform the activities of a trade by expanding compulsory certification is counterintuitive.

The complexity associated with today's economy suggest that the apprenticeship system needs to become more, not less flexible. The OCC therefore feels it is critical that, in reviewing applications for compulsory trades and apprenticeship ratios, the College do so with the goal of adopting innovative training models that can provide greater flexibility in the design of apprenticeship programs to meet the evolving demands of employers and employees for more continuous learning opportunities. Through its consultation and research gathering processes, the College should perform a situational analysis of each trade under review and make recommendations on how existing training programs can be modified to allow apprentices to obtain multiple qualifications for complimentary trades within a streamlined and expedited framework. Such changes would provide employers and employees with the same quality of training in the full suite of skills offered by current programs, but with an emphasis on promoting greater cross-functionality between the trades and flexibility for owners and tradespeople.

An innovative approach to continuous learning in apprenticeship would possess the following characteristics:

- Provide employers with the skilled employees they need to remain competitive
- Provide flexibility in training to meet the evolving demands of youth and employers
- Make apprentices more marketable to employers who require higher entry-level skills
- Make apprenticeship a more attractive and flexible career option for youth and the people who influence their career choices
- Provide youth with a clear path into apprenticeship and postsecondary education
- Ensure that those who have completed apprenticeship do not face roadblocks to completing other forms of education or training

Adopting an approach to apprenticeship training that embodies the above principles would allow the College to ensure excellence in the skilled trades while at the same time providing the Ontario economy with the skilled employees it needs to remain competitive.

Thank you for taking the time to review our concerns. Should you have any questions or comments, please direct your staff to contact Stuart Johnston, Vice President Policy and Government Relations, at stuartjohnston@occ.on.ca or 416-482-5222 ext. 246.

Yours sincerely,



Len Crispino
President & CEO

cc: The Hon. John Milloy, Minister of Training, Colleges, and Universities
Bob Bailey, MPP, PC Critic, Training, Colleges and Universities
Rosario Marchese, MPP, NDP Critic, Training, Colleges and Universities
The Hon. Dalton McGuinty, Premier of Ontario
Tim Hudak, MPP, PC Leader, Leader of the Official Opposition
Andrea Horwath, MPP, NDP Leader
OCC members