

June 15, 2021

Ontario Skilled Trades Panel

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

RE: Skilled Trades Panel Consultation (Feedback on Phase 2)

Overview

The skilled trades are a critical source of jobs and economic development for communities across Ontario. Simplifying and strengthening the provincial skilled trades and apprenticeship system has been a longstanding priority for the Ontario Chamber of Commerce (OCC) and our Workforce Development Council. The current process is cumbersome, confusing, and deters many would-be apprentices from engaging in the trades.

Many trades are experiencing labour shortages which will inevitably impact infrastructure and construction commitments on the horizon. In that context, the government's new service delivery model will need to be modern, streamlined, client-facing, and equitable for apprentices, skilled tradespeople, and sponsors to address the shortcomings of the current regime.

This submission will focus on the following four areas:

1. The process and criteria for prescribing new trades (known as trade prescription);
2. The criteria that should be followed to de-prescribe trades;
3. The process and criteria that should be considered for classifying a trade as compulsory or voluntary; and
4. Opportunities to develop initiatives that complement training for tradespeople.

1. Trade prescription

In Ontario, there are currently 144 trades, but only 70 of those 144 trades are active with in-school support. While there is clearly a need to develop new voluntary trades and evolve existing ones, initial enthusiasm for prescribing a new trade should be restrained in the absence of compelling evidence and a clear business case. Prescription of a new trade should always address a specific need, ideally informed by labour market demand. Before the creation of a new trade, extensive efforts should be made to ensure it is necessary to create a new trade rather than, for instance, adapting or updating the curriculum of an existing trade. Equally as important is ensuring the new trade does not overlap with an existing one.

Emphasis should also be placed on simplifying existing trades and harmonizing Ontario's trades with those in other provinces and territories to allow for greater interprovincial labour mobility, starting with trades in which Ontario is currently experiencing a shortage.

The OCC's Workforce Development Council recommends:

- Enthusiasm for trade prescription should be resisted in absence of compelling evidence.
- New trades should be informed by labour market demand. Efforts should be made to avoid overlapping with existing trades and consideration should be given to adapting or updating curriculum for an existing trade before creating a new one.
- The process for prescribing a new trade must be evidence-based, non-political, and managed by the Ministry of Labour, Training and Skills Development.
- Prior to the prescription of a voluntary trade, an independent analysis should be undertaken by the Ministry, informed by training delivery agents, the business community, and journeypersons.
- Input from the business community and colleges should be considered regarding the desired in-school curriculum and workplace standards for any proposed trade.

2. Trade de-prescription

Given that there are a number of inactive trades, there is a need for a clear and transparent wind down procedure for inactive or outdated trades. However, that process must be considerate of the trade holder. More specifically, if a trade is being de-prescribed, what does that mean to those who hold it or who are currently training for it? Similarly, it should also be made clear to prospective applicants that the trade is under consideration for de-prescription.

The OCC recommends:

- The government should have a formal, semi-automatic de-prescription process for inactive trades similar to the process used when training delivery agents have been inactive for a prolonged period of time.
- De-prescription should also be considered in instances when the Ontario government or Skilled Trades Ontario is not revising in-school curriculum and workplace standards every five years to ensure they are in accordance with evolving technology (including digital and green requirements) and competitive workplace standards.
- A clear transition plan should be developed to help those who already have a trade that is being de-prescribed transition to another trade. Individuals applying to a trade that is under consideration for de-prescription should also be made aware.

3. Classifying a trade as compulsory or voluntary

Considerable resources and programming are being appropriately dedicated towards promoting skilled trades and increasing awareness of career paths in the trades. However, if the service delivery model for skilled trades remains cumbersome and confusing, prospective applicants will be deterred, and the impact of education campaigns will be limited.

Changing a trade's status from voluntary to compulsory or compulsory to voluntary would cause negative disruption for many stakeholders. Therefore, maintaining the current regulatory framework should be considered the default. While this Panel is considering the question of why a trade is voluntary or compulsory and is designing a system to address this question, we caution against changing the current delineation of trades. A change to compulsory status for the majority of trades would have a number of unintended consequences including disrupting work continuity, requiring massive changes to collective agreements, potentially exacerbating labour shortages, and imposing additional costs on government for training centres. These ramifications must be carefully considered. Even the start of a process to determine a trade's classification will be controversial and destabilizing to industry. This could potentially create divisions between unions, employers, and workers.

There are several considerations that will be critical to ensuring a transparent and fair process for trade classification and reclassification, including:

- A thorough cost-benefit analysis which would assess the social impacts of expected changes in practice against, for instance, higher administration expenses and costs to the economy.
- There must be an unambiguously clear business case from the applicant justifying the need for a voluntary trade to be made compulsory before a formal review is triggered. Under the previous system, the threshold for the Ontario Colleges of Trade to trigger a review was insufficient.
- Consideration must be given to the administrative ramifications and increased demand resulting from a trade being made compulsory, particularly on training delivery agents such as colleges who are responsible for 85 percent of skilled trades training.
- Any discussion of classifying a trade as compulsory should be done in close consultation with colleges, employers, and organized labour to ensure the goals of classification are implemented through effective training programs tested thoroughly before the individual completes an apprenticeship.
- Any review process must be regionally focused and should be inclusive of Ontario's various communities across the province to solicit feedback, including rural and northern Ontario.

- Explicit consideration of the status of non-certificate of compliance (CoQ) holding tradespersons that are currently performing work should be paramount. For most voluntary trades, the vast majority of workers currently performing work do not hold a CofQ. This process needs to explicitly include them as key stakeholders. In the absence of real consultation, many workers may find themselves operating illegally without any input should a trade's status change to compulsory.
- Consideration over potential conflicts with the Agreement on Internal Trade and potential barriers to entering the workforce for out-of-province workers.
- The impacts to new Canadians and foreign workers, the vast majority of which would be non-CofQ holding workers needs to be assessed. Additional barriers for these workers such as equivalency testing could create problems with transitioning this workforce and could prevent many qualified workers from working in their trade.
- The Scope of Practice for any trade that is being considered for compulsory status, must go through a review to ensure that the trade's scope is up-to-date and relevant to employers.
- There needs to be broad buy-in from industry at large for a trade to change its status.
- Consideration must also be given to existing enforcement agencies regulating the trades and their capacity constraints as it relates to enforcing a new compulsory trade.
- Any proposals that flag health and safety as a key justification for changing a trades status should first consider if there are less disruptive ways of achieving the same outcome.
- A scan of all agencies related to the trade should be performed to understand the regulatory environment and safeguards already in place. If they are deemed insufficient, enhancing the existing authorities and regulations should be the preference rather than a wholesale change in a trade's status.

4. Initiatives that complement training for tradespeople

More must be done to foster greater inclusivity and diversity within the trades, particularly given the underrepresentation of women, newcomers, racialized Canadians, and Indigenous people. Offering financial support through loans, scholarships, and child care subsidies can help enable greater participation rates for these groups in the trades but it is also important to improve the accessibility of training programs.

To this end, the government should consider:

- Setting gender and diversity targets within government-funded reskilling initiatives. Diversity targets should be integrated within all these investments to actively seek participation from women, Indigenous people, people with disabilities, and other underrepresented groups.

- Designing training opportunities to address skilled shortages identified through labour market data. Training programs should also prioritize skills shortages, using labour market data to ensure that training opportunities are available to meet demand in high-growth industries. For example, Ontario is facing a dire shortage of boilermakers, bricklayers, and welders but has an ample supply of electricians and plumbers.
- Partnering with colleges and employers to offer financial support (including loans, scholarships, and child care subsidies) that enables participation of underrepresented groups in reskilling. A plethora of training opportunities already exist in Ontario, but individuals often lack the financial means to participate. Federal and provincial governments should partner with colleges and employers to jointly sponsor financial support that enables greater participation of underrepresented groups. Targeted supports could include low-interest loans, training scholarships (which can be geared towards particular skilled trades).
- Funding upfront for every apprentice to access to wraparound services: essential skills assessment, post-test remedial training, learning accommodations, and disabilities support. Governments should design skilling, upskilling, and reskilling programs that have flexible formats, customized support, and wraparound services embedded within program design.
- Ensuring that apprentices and journeypersons can use previous training, credentials, and certifications to receive certification in a different trade. For instance, a certified plumber should not be required to go through the entire apprenticeship (6,450 hours on-the-job training and 720 hours in-class training) to receive a CofQ in sprinkler fitting since many skill sets would have already been covered. In other jurisdictions it is common for a worker to have more than one certification. Ontario's system should similarly be designed to better allow workers to receive multiple certifications.

Conclusion

The OCC and our Workforce Development Council are committed to enhancing the competitiveness of Ontario's skilled trades sectors as a source of high-quality jobs and economic growth. As the province emerges from the COVID-19 crisis, it will be more important than ever to ensure skilled trades employers are able to access the workers they need to sustain high demand for new projects. At the same time, Ontarians of all ages interested in entering the trades should have access to a modern, streamlined, and equitable system.