



**Labourers' International Union of North America
Ontario Provincial District Council**

Submission to the Standing Committee on Finance and Economic Affairs
Bill 288: *Building Opportunity in the Skilled Trades Act, 2021*

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Introduction

The Labourer's International Union of North America (LiUNA) has over half a million members in North America and more than 140,000 here in Canada. In collaboration with government and employers, LiUNA fights for worker safety, innovative skills training, and best-in-class wages and benefits. In Ontario, LiUNA has a long and storied history striving to improve conditions for our members and ensure they have meaningful, safe, and well-paying employment. Our approach is always positive, proactive, and progressive. We believe in working collaboratively with government and employers for our mutual benefit.

From hospitals to highways, our members play a large role in major public and private sector construction projects. LiUNA members are committed to building a better province for all Ontarians. We have anchored construction of the watermains, transit systems, and housing developments that form the backbone of the province. We are proud of the work our members do, and the value we provide to Ontario.

As both a labour organization and training provider, LiUNA understands the important role apprenticeships play in creating economic opportunity and shaping a highly skilled workforce. For generations, the skilled trades have offered prosperous and meaningful careers to countless LiUNA members and their families. We applaud the government's continued efforts to support Ontario's skilled workforce. In order to achieve our province's ambitious growth and infrastructure development goals, we must empower today's apprentices to become tomorrow's leaders.

Investing in Apprentices

Across Ontario, financial, social, and economic barriers have historically impeded the entry of many young people into the skilled trades. This has contributed to a significant shortage of skilled tradespeople in the province, despite the trades being a source of meaningful and well-paying employment.

Starting in 2019, and emphasized in its 2020 and 2021 budgets, the government has demonstrated a commitment to addressing the province's skilled trades shortage. The province's annually shrinking participation in the skilled trades was caused in part by a complicated and arduous bureaucratic process, and the overall neglect by the government of this prosperous career path. While it will take years to address this challenge, we are encouraged by Ontario's continued action, and advocates such as Minister McNaughton.

Supporting Today's Apprentices

The skilled trades have long been dismissed as undesirable work – an unfair and incorrect stereotype. These stigmas have contributed to today's current shortage of apprentices as many talented young people opt to avoid the trades. Ontario's commitment to experiential learning opportunities such as the Ontario Youth Apprenticeship Program has successfully introduced young people to multiple career options – many of which were previously unknown to them. Investments such as the province's \$39.6 million enhancement to the Specialist High Skills Major program will

allow more students to explore apprenticeship pathways and prepare for prosperous futures.

The high initial costs associated with starting an apprenticeship has historically limited participation in the skilled trades – particularly by underrepresented groups. For many, the costs of tools, training, and the loss of income while receiving in-class instruction make apprenticeships unattainable, in spite of the employment opportunities that follow. No Ontarian should be denied an opportunity to take on a meaningful career due to an inability to shoulder the initial costs of an apprenticeship. As a cornerstone of its efforts to increase participation in the skilled trades, the government should continue its supports for apprentices. We understand the financial burdens that many apprentices face and we look forward to working with the province as it continues to remove these barriers.

Moreover, LiUNA is committed to advancing diversity and inclusion in the construction industry. We strongly encourage the province to support additional training and outreach programs to address underrepresentation in the skilled trades. LiUNA has successfully led programs including conducting training in remote northern communities and, together with our employer partners, women-only apprenticeship courses. In order to address the province's shortage of skilled trades, it is critical that we remove social barriers which have deterred many talented Ontarians from the construction industry. We proudly celebrate the diversity of our membership yet recognize that ongoing work is required to ensure that jobsites are inclusive, safe, and free from harassment for all

labourers. LiUNA hopes to have the opportunity to work collaboratively with its employer partners and the province to welcome all apprentices.

Providing World Class Training

Apprenticeship training provides workers with the fundamental skills that they need to succeed on their first jobsites. Most importantly, these training courses are critical to ensuring that apprentices gain the knowledge and skills they require to be safe at work. LiUNA is proud to operate nine training delivery agencies and 15 campus locations, supported by 10 training funds. We understand the importance of providing innovative training to support the next generation of tradespeople and encourage the province to invest in Ontario's apprentices.

The instruction which apprentices receive at training centres is applied on the jobsite each day. As construction technology advances annually, so must the training that we offer. It is critical that apprentices learn the most up-to-date practices on modern equipment. Training ensures that apprentices are prepared to enter jobsites with a comprehensive understanding of current practices – supporting their success. Understanding these practices ensures that workers are safe on site and using equipment appropriately.

Through its strategy, the government has articulated the importance of offering equal opportunities to apprentices and post-secondary students alike as it seeks to break stigmas surrounding the skilled trades. For years, the province has sought to attract

talented students to Ontario's colleges and universities by funding improvements on campuses. Failing to offer the same support to non-college providers suggests that training centres are inferior – and that could not be further from the truth. As we seek to attract talented apprentices, we ask that the government commit to offering equal supports for all college and non-college training providers.

Modernizing Ontario's Apprenticeship Process

The government's 2018 commitment to wind down the Ontario College of Trades (OCOT) was a milestone in its efforts to address the systemic burdens that had crippled participation in the skilled trades for nearly a decade. Following the creation of the OCOT, annual apprenticeship registrations fell by 40%. Rather than support tradespeople, the College made it significantly more difficult for apprentices to navigate the certification process and made annual licensing more expensive for many trades. It was evident that the conditions created by the OCOT made Ontario an undesirable jurisdiction to enter apprenticeship and practice as a licensed tradesperson.

Bill 288 achieves the province's longstanding goal to create a suitable and less cumbersome agency to support and oversee the hundreds of thousands of skilled tradespeople who live and work in Ontario. The legislation reflects the desires of countless labour organizations for a streamlined system for apprentices to complete and record their required certifications and competency examinations. Heeding the advice of the Skilled Trades Panel, Skilled Trades Ontario should serve as a convenient and flexible platform for apprentices to access the information and services that they need to

succeed. This is an exciting opportunity for the province to create one of the country's leading apprenticeship programs and meet the needs of our next generation of workers. Our apprentices should have the ability to focus on their skill development without having to worry about navigating layers of bureaucracy throughout the certification process.

Additionally, LiUNA supports the province's commitment to increasing flexibility in apprenticeship training. Construction technology and practices are evolving rapidly; it's critical that our training models are developed in a flexible manner in order to ensure that apprentices are prepared with the skills that they need for tomorrow's job sites. Historic failures to update training practices and government-mandated rigidity did a disservice to apprentices. Antiquated training processes are unsafe – apprentices should be prepared with a complete knowledge of the latest equipment and methods that they will be required to use on the jobsite. By working proactively with industry and labour organizations, the government will be able to develop relevant skills curricula.

Addressing Regulatory Burdens

In addition to its contributions to the looming skilled trades crisis, the OCOT model created uncertainty regarding labour jurisdiction and overlaps in scopes of practice. Previous governments politicized the province's compliance and enforcement framework, threatening the employment of thousands of workers. LiUNA commends the government for its decision to separate compliance and enforcement from curriculum

development and certification. The provincial model must reflect the needs of the industry and protect the rights of workers.

The formerly rigid regulatory framework failed to reflect the multi-skilled nature of many trades. The overlaps in many scopes of practice offer clear evidence that they should not be restricted in an arbitrary manner. While scopes of practice often inform training programs, they are not necessarily indicative of the skills of various trades or the risk of harm associated with performing certain tasks. In some cases, multiple trades perform the same tasks as part of their regular duties, without a risk of harm to themselves, their co-workers, or the public. The province's efforts to define scopes of practice must reflect these overlaps and the many skilled tradespeople who perform interconnected practices.

Similarly, in order for a scope of practice to be a basis of enforcement, it must be easily demonstrated that the performance of a task constitutes a risk of harm unless a worker holds the appropriate certification. As aforementioned, multiple overlaps exist in skilled trade practices. It is critical that workers are not unfairly targeted for performing tasks which they can complete in a safe and competent manner. Enforcement must be mindful of the multidisciplinary nature of construction practices.

Conclusion

The *Building Opportunity in the Skilled Trades Act* marks a significant milestone in the government's continued efforts to advance the long-neglected skilled trades crisis and

modernize the apprenticeship process. Building on the success of the ongoing *Skilled Trades Strategy*, the province should continue to support apprentices and offer relief for the financial and social barriers which have historically limited participation in the skilled trades. The success of Ontario's ambitious growth goals will be dependent on educating and supporting a new generation of skilled workers.

Significantly, the measures included in Bill 288 prudently respond to the systemic burdens which have drastically reduced participation in the skilled trades. LiUNA is optimistic that replacing the OCOT will provide an opportunity to implement a new system which reflects the needs of industry and prioritizes the training and education of apprentices. Skilled Trades Ontario should operate in a manner which conveniently offers information and support for apprentices and those interested in entering the skilled trades.

Finally, LiUNA is encouraged by the province's commitment to maintain an apolitical approach to its compliance and enforcement model. The government's updated model must reflect the many overlaps in scopes of practice and maintain flexibility to support the rights of workers. Ontario's enforcement model should consider the risk of harm associated with workers performing various tasks and the often-shared practices completed by workers. We look forward to working collaboratively with the government to address the skilled trades shortage and create an environment which prioritizes the rights and safety of workers.