



October 21, 2022

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

Sent via email submission.

RE: Proposed Amendment to O.Reg 422/17 under the Ontario Immigration Act (2015), Relating to the Ontario Immigrant Nominee Program (OINP)

On behalf of the Ontario Road Builders' Association (ORBA), we would like to provide the following written comments in response to the proposed amendment to O.Reg 422/17 under the Ontario Immigration Act (2015), relating to the Ontario Immigrant Nominee Program (OINP) on the Ontario Regulatory Registry for public comment (22-MLTSD012).

The Ontario Road Builders' Association is proud to represent the road building sector in Ontario. Our members build and maintain the majority of provincial and municipal roads, bridges, transit and transportation infrastructure across the province. The road building sector directly and indirectly employs approximately 56,000 workers at peak season and impacts all Ontarians.

We are pleased to see this government make economic immigration a priority through the Ontario Immigrant Nominee Program (OINP). We strongly support any attempts to reform the immigration system to make it easier for skilled tradespeople to move to Ontario and work in our sector. An immigration strategy that recognizes the unique workforce requirements of the transportation industry is a crucial step to keeping up with the growing transportation infrastructure needs of Ontario.

Ontario is currently facing a growing shortage of construction workers. Recent projections indicate that we will require tens of thousands of new workers in the industry, including general labour and non-apprenticeship trades over the next decade (Buildforce, 2022). Under the new National Occupation Classification (NOC) 2021 system, the occupations that represent the biggest need for our industry include:

- NOC 72401: Heavy-duty Equipment Mechanics (TEER 2)
- NOC 73400: Heavy-duty Equipment Operators (TEER 3)
- NOC 73300: Truck Drivers (TEER 3)

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- NOC 74205: Maintenance Equipment Operators (Snowplow Operators) (TEER 4)
- NOC 75110: Construction Trades Helpers and Labourers (TEER 5)

Currently, many of our heavily desired occupations only qualify for two of the OINP streams: OINP Employer Job Offer: In-demand Skills Stream, and the Express Entry Skilled Trades Stream. Allowing more critically important heavy civil construction occupations to qualify for more OINP streams, such as the In-demand Skills and Skilled Trades streams will provide foreign talent with more opportunities to meet our labour needs. ORBA appreciates any attempts to increase the number of nominations for the OINP Employer Job Offer: In-demand Skills Stream, and the OINP Express Entry Skilled Trades Stream.

In 2022, Ontario received 9,750 nominations from the federal government for the OINP. ORBA supports any increases to the number of nominations that Ontario receives each year, though it recognizes that this number is controlled by the federal government. We understand that Ontario has advocated for the doubling of nominations to 18,000 and for more control over the program. ORBA is supportive of both of these requests.

Our multi-skilled workforce features many mentoring opportunities and non-apprenticeship jobs, which are a good fit for newcomers with varying experience and language capabilities in the sector. Our industry presents tremendous opportunities for foreign workers that are interested in pursuing a career in construction, but do not have the required apprenticeship certification for many other skilled trades. To reflect this growing demand for labour, ORBA suggests the following potential policy changes related to the OINP streams listed above:

OINP Employer Job Offer: In-demand Skills Stream:

- ORBA greatly appreciates the recent additions of heavy-duty equipment operators and construction trades helpers/labourers to the list of eligible occupations under the In-demand Skills Stream. ORBA is hopeful that this will help the industry meet some of its labour needs.
- ORBA suggests expanding the applicability of this program to include maintenance equipment operators (snowplow operators). The average age of a snow plow operator in Ontario is over 50; The industry is concerned by the lack of available labour in this important sector and the young talent available to replace the retiring population. ORBA is currently engaging with the Ministry of Transportation on this issue.

OINP Express Entry Skilled Trades Stream:

- This stream currently includes a very broad list of occupations beyond the traditional, apprenticeship “skilled trades” (butchers, bakers, fishermen, and miners). ORBA suggests expanding the applicability of this program to include

occupations such as heavy-duty equipment operators, maintenance equipment operators, truck drivers, and construction trades helpers/labourers.

- ORBA appreciates that construction helpers/labourers have been added to the in-demand stream and would like to see them also added to the Express Entry Skilled Trades Stream. Our industry relies on experienced construction helpers/labourers to provide general labour, help shovel and spread asphalt, finish cement barriers etc.. It is not uncommon for these workers to then advance to operating machinery and supervising crews.
- Right now, the Canadian Language Benchmark (CLB) requirements under this stream do not currently match the language requirements for the Federal Skilled Trades Program. ORBA suggests that the language proficiency requirements for reading and writing be lowered to a CLB level 4, while keeping the CLB level at 5 for speaking and listening. This will match the program language requirements to the Federal Skilled Trades Program. This will allow more workers to qualify for permanent residency under the skilled trades stream.

Thank you for the opportunity to provide comments. Please do not hesitate to contact Brianna Puigmarti, Senior Policy Advisor at Brianna.puigmarti@orba.org with any questions regarding this submission.