



CAUTION WORK AHEAD

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The Ontario Chamber of Commerce (OCC) is an independent, non-partisan business network. Our mission is to support economic growth in Ontario by advocating for pro-business policies and defending business priorities at Queen's Park.

For more than a century, the OCC has been providing our members with practical supports, advantageous network opportunities, and access to innovative insight and analysis.

We represent local chambers of commerce and boards of trade from communities across Ontario. Through this network, we are the voice of 60,000 members that range from small businesses to major corporations and industry associations. Together, our members employ two million people and produce nearly 17 percent of Ontario's GDP.

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LETTER FROM THE OCC

Ontario's economy is in transition; areas that were once historical strengths are now struggling. The province's value proposition in the global economy is changing. Without appropriate labour market policies, the province will fail to capitalize on new opportunities and be left behind in the global competition for talent and investment.

A core component of the Ontario Chamber of Commerce's five year *Emerging Stronger* agenda is building a 21st century workforce, which includes apprenticeship reform. If Ontario is to emerge stronger, we need a labour pool that is adaptable and highly skilled. The Government of Ontario's response to this challenge includes the creation of the Ontario College of Trades.

From the beginning, the College has caused much controversy. Many of our members view the College as unnecessary bureaucracy and just another financial burden on business and workers.

But, our members are willing to give the College a shot, if it is properly mandated and able to play a constructive role in plugging labour shortages in the skilled trades. This paper makes detailed and specific recommendations on how to make the College more responsive to the overall needs of the economy. Minus these changes, we think that the College will be poorly positioned to succeed.

We hope our recommendations kick start a principled and informed discussion on the College, its role, and its capacity to help meet some of Ontario's most pressing policy challenges.

Thank you,



Allan O'Dette
President & CEO
Ontario Chamber of Commerce

EXECUTIVE SUMMARY

THE RIGHT PATH FOR BUSINESS?

Since its inception, the Ontario College of Trades (the College) has faced harsh criticism from many industry professionals who are concerned about the fees and compulsory membership structure. There are also concerns that the College's regulatory functions are negatively impacting small- and medium-sized enterprises (SMEs).

This report highlights several serious issues facing the College, which collectively have contributed to its "legitimacy problem." Specifically, this report identifies the following:

- The College's decisions around journeyman-to-apprentice ratios and compulsory certification are being made without sufficient data and representation from affected parties.
- The College's trade classification process lacks transparency and is biased toward increasing the number of compulsory trades.
- The College's onerous ratio review process is biased against small and rural businesses.
- The College has not lived up to its mandate of increasing the number of workers in the skilled trades in Ontario.

And yet, OCC members are willing to give the organization a chance (see resolutions in Appendix). The OCC and its members believe that given the right structure and policies, the College has the potential to make Ontario's skilled trades and apprenticeship system more responsive to the competitive imperatives of the economy.

The success of the College will depend on its ability to address the labour shortages in the trades, elevate the standards in the industry, protect consumers, and promote the attractiveness of careers in the skilled trades. In its current form, however, the College is not well positioned to deliver on many of the core elements of its mandate.

Based on extensive consultation with our members, the OCC offers six recommendations to reform the Ontario College of Trades and make it more responsive to employers' needs.

SUMMARY OF RECOMMENDATIONS

1. Journeyperson-to-apprentice ratio review decisions should be evidence-based and grounded in robust quantitative and qualitative analyses of key economic and labour market impacts.
2. The journeyperson-to-apprentice ratio review submission process should be less onerous. The College should actively solicit participation from smaller and rural players.
3. The trade classification process must be based on robust data, analysis, and a fair review process. The bar for designating a trade must be very high, requiring substantially more than a plurality of affected parties.
4. Ratio review and trade classification processes and outcomes must be transparent, with support and opposition clearly tracked. Results of ratio reviews must be aggregated and easily accessible to the public.
5. More robust measuring and reporting on the College's performance is required, particularly with respect to addressing skills shortages.
6. Greater emphasis should be placed on attracting youth to skilled trades careers, a critical component of the College's mandate that is currently unfulfilled.

If the College is unable to fulfill its mandate, the OCC will have no choice but to advocate a complete overhaul of the provincial approach to regulating the skilled trades. The "service standards" approach adopted by the Province of British Columbia is a promising alternative. Its focus is on training and credentials, particularly with respect to aligning training programs with anticipated labour market needs. The supply of trades people is largely determined by market forces.

THE BRITISH COLUMBIA MODEL

Research by C.D. Howe suggests that regulating entry into the trades is not an effective means of ensuring high quality in the skilled trades. Instead, models that impose minimum standards of service quality, as in British Columbia, are less distorting from a labour market perspective (Brydon and Dachis, 2013).

British Columbia does not require certification in any skilled trade and maintains a 1:1 journeyperson-to-apprentice ratio, with no secondary ratios.

The Industry Training Authority (ITA) is the provincial government agency responsible for apprenticeships and skilled trades training in the Province of British Columbia. It operates with a focus on increasing credentials and aligning training with current and anticipated labour market needs.

CONTEXT

ONTARIO'S SUPPLY-DEMAND GAP IN THE SKILLED TRADES

Ontario faces a profound labour market paradox. It is experiencing a skills deficit and looming labour market shortages in key sectors. At the same time, unemployment and underemployment in the province remains high. As the baby boom generation exits from the workforce, Ontario's working-age population as a share of the total population is expected to decline by almost 9 percent from 2011 to 2036 (Ontario Ministry of Finance, 2012).

If unaddressed, Ontario's skills gap could result in 560,000 unfilled positions by 2030 and cost its economy up to \$24.3 billion in foregone Gross Domestic Product (GDP) and \$3.7 billion in provincial tax revenues annually (Conference Board of Canada, 2007; Stuckey and Munro, 2013).

The skills gap is particularly acute in the skilled trades. Consider these facts:

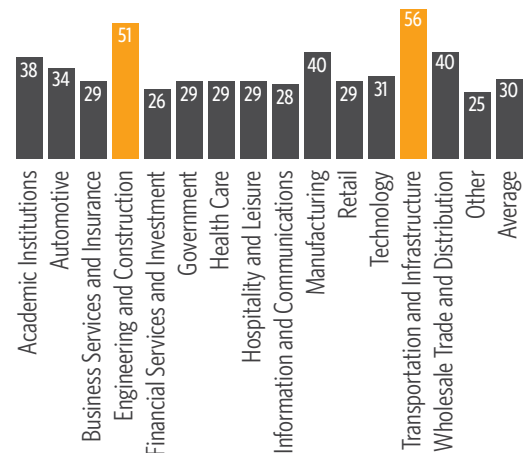
- According to the Conference Board of Canada's Ontario Employer Skills Survey, 41 percent of employers are currently seeking employees with trades training, with the greatest demand in the areas of construction and technology (Stuckey and Munro, 2013).
- Skills Canada reports that 40 percent of new jobs created in the next decade will be in the skilled trades. However, currently only 26 percent of young people aged 13 to 24 are considering a career in these areas (Spence, 2012).
- The OCC's survey data reveals that 30 percent of businesses in Ontario have had difficulty filling a job opening over the last 12 to 18 months, due to the fact that they could not find someone with the right qualifications. This shortage is most prominent in those sectors that rely most on skilled trades—transportation, infrastructure, manufacturing, engineering, and construction (OCC Membership Survey January/February 2013).

There are a couple of factors contributing to the existing and anticipated labour shortages in Ontario's skilled trades. First, the ageing of the population is expected to create a demographic shift in the trades, with a large volume of certified journeypersons exiting the labour market. At the same time, the number of certified workers available to replace those retiring are decreasing, as a shift in educational preferences has left the trades as an often overlooked career option for youth.

Another contributing factor is Ontario's restrictive and outdated apprenticeship system.

BUSINESS IS HAVING DIFFICULTY FINDING PEOPLE IN SKILLED TRADES

Has your business had difficulty filling a job opening over the past 12-18 months because you couldn't find someone with the right qualifications? Percentage of respondents who have had difficulty:



Skill shortages were the most prevalent in sectors with regulated workforces.
N = 2059 Survey Date: January- February 2013

ONTARIO'S APPRENTICESHIP SYSTEM

The apprenticeship system is the primary resource for maintaining an adequate supply of well-trained skilled trades people. Under the current system, many employers in Ontario are required to have three qualified journeypersons for each apprentice (a 3:1 ratio)—along with PEI, this is the highest ratio of any province in Canada (Brydon and Dachis, 2013). This ratio forces many companies to lay off apprentices and leave apprenticeship positions vacant, since they cannot afford to hire additional journeypersons.

By limiting the number of apprentices that employers are able to hire, Ontario's restrictive and artificially high journeyperson-to-apprentice ratios exacerbate the province's dire skilled trades shortage. Other factors, such as low examination pass rates and the availability of uncertified work, have led to relatively low levels of apprentices completing their training. As a result, completion rates among Ontario apprentices average approximately 50 percent (Ontario Construction Secretariat, 2013).

High ratios have a particularly negative effect on the economies of Ontario's rural communities (who lack large unionized companies) and small-and medium-sized businesses (who do not have multiple certified journeypersons). They also encourage skilled apprentices to migrate to provinces with lower ratios where the completion rates are higher.

If implemented, our recommendations will result in a more responsive College and reductions in journeyperson-to-apprentice ratios that reflect the needs of employers.

Median Journeyperson-to-Apprentice Ratios by Province, 2012

Province	Initial Median Journeyperson-to-Apprentice Ratio*	Secondary Journeyperson-to-Apprentice Ratio*
Alberta	1:2	N/A
British Columbia	N/A	N/A
Manitoba	1:1	2:1
New Brunswick	1:1	N/A
Newfoundland & Labrador	1:2	N/A
Nova Scotia	1:1	N/A
Ontario	1:1	3:1**
Prince Edward Island	1:1	3:1
Quebec	4.5:1	N/A
Saskatchewan	1:2	~3.5: 1

*Red Seal Trades Only. **2012 median ratio. 2013 median pending.
Source: Brydon, Robbie and Benjamin Dachis. 2013. (Access Denied: The Effect of Apprenticeship Restrictions in Skilled Trades). C.D. Howe Institute.

JOURNEYPerson-TO-APPRENTICE RATIOS:

Apprenticeship training provides prospective skilled trades people the opportunity to gain hands-on learning under the direction of a certified trades worker, called a journeyperson. Almost 80 percent of apprentice training is acquired while on-the-job, with another 20 percent of technical training completed at colleges and training centres.

In Canada, provinces have the exclusive power to determine how many journeypersons must be employed for every apprentice hired. This ratio may differ between the first apprentice a firm hires and any subsequent hires (called secondary ratios).

THE ONTARIO COLLEGE OF TRADES

The College is the first self-regulating professional body for skilled trades in the country.

The College was created in 2009 through the *Ontario College of Trades and Apprenticeship Act* with the mandate, “to lead the promotion, regulation, and governance of skilled trades in Ontario.” The goal of the College is to give industry a greater role in the governance, certification, and training of the skilled trades. It is also mandated to strengthen consumer protection by providing a searchable registry that allows consumers and employers to view the credentials and licensing status of its members.

The College is modeled after other professional colleges already in existence in Ontario, as well as a number of trades governance models in other jurisdictions both within Canada and abroad. As it matures, it will likely be the largest self-governing college in Canada with over 150 distinct skilled trades and upwards of 600,000 potential members.

It is currently organized into four divisions—construction, services, industrial, and motive power—and operates with four strategic objectives:

- promote the College of Trades and build its membership;
- regulate the trades;
- govern its members; and
- attract people to the skilled trades;

In April 2013, the College became fully operational and assumed responsibility over areas of the skilled trades that were previously overseen by the Ministry of Training, Colleges, and Universities and the Ministry of Labour. At this time, anyone licensed to practice a compulsory trade in Ontario automatically became a member of the College and is listed on its public registry.

Members of the College are required to pay a yearly membership fee of up to \$120 to validate their certification. Previously, licensed trades people were obligated to pay \$60 every three years to the province to maintain certification.

WHY THE COLLEGE?

The creation of the College was the result of 36 months of consultations between government and industry stakeholders, based on the recommendations of two major reports by Tim Armstrong (2008) and Kevin Whitaker (2009).

In 2007, Armstrong was commissioned by the Ontario Government to examine the impact of expanding the compulsory certification of skilled trades in the province, as well as make recommendations on a decision-making framework for dealing with applications for changes to trade status.

Armstrong concluded that the issue of compulsory certification could not be dealt with in isolation. Instead, the Government needed to address broader issues within the apprenticeship system and the skilled trades as there was “substantial potential to improve and enhance the standing and effectiveness of apprenticeship trades and their continued, strengthened contribution to the growth of Ontario’s economy” (2008).

Unlike other jurisdictions across Canada, Ontario lacked a unique process to deal with compulsory certification and other issues related to apprenticeship. As a result, Armstrong recommended a fundamental re-examination of how trades were governed in Ontario, including the creation of an all-trades governance institution, the “College of Trades”.

In May 2009, Whitaker was made responsible for developing the new College’s governance structure, scope and framework, and its relationship with Government. According to Whitaker, the proposed College, “would help ensure Ontario’s skilled trades sector could meet the growing needs of the economy while placing the Trades on a similar footing with teachers, doctors and nurses who have their own professional colleges” (2009).

FIXING THE COLLEGE

There is uncertainty among our membership and Ontario businesses about the value of the College. Many view the College as an unnecessary bureaucratic and financial burden on employers and trades people.

Many businesses criticize the College for focusing its efforts on its new regulatory role, and ignoring its mandate to address the broader needs of employers and the labour force. An important part of the College's mandate is to promote the skilled trades to youth and under-represented groups as a viable and attractive career path; however, this component has received little attention.

In its current form, the College is not well positioned to deliver on many of the core elements of its mandate. In this report, the OCC makes six recommendations that it believes will make the College more successful in responding to the needs of employers, trades people, and the economy.

Unless corrective action is taken, our members feel that the provincial approach to regulating the skilled trades should be completely overhauled.

FIX THE APPRENTICESHIP RATIO REVIEW PROCESS: FILL THE DATA VACUUM AND LEVEL THE PLAYING FIELD

Key decisions about journey-person-to-apprentice ratios are made by an appointed Ratio Review Panel through "fair, transparent, and consultative" processes that provide opportunity for stakeholder input. Once a Review Panel is convened, stakeholders, such as Trade Boards, College of Trade members, unions, associations and other interested parties, are invited to contribute written and oral submissions.

Each Ratio Review Panel is comprised of three members selected from a Roster of Adjudicators. The *Ontario College of Trades and Apprenticeship Act, 2009* requires individuals appointed to the Roster to act in a neutral manner and have no vested interest in the trade under review.

Despite the ostensible neutrality and consultative nature of the ratio review process, there are significant problems.

Problem: Participation and input from stakeholders throughout the apprenticeship ratio review process has been insufficient.

The low levels of participation during the ratio review process so far suggest that the consultative process is flawed. Ratio Review Panels are faced with the task of making a decision based solely on the material

"As has become the trend in many of these ratio reviews, there is little hard data yet collected to definitively answer most of the criteria we are directed to by the regulation."

(RR14-2012)

provided by the voluntary written and oral submissions of stakeholders. Without broader representation of stakeholder opinion, decisions regarding ratios have been and will continue to be made without an understanding of the needs of particular regions and employers across the province.

The first (A) round of ratio reviews that began in the summer of 2012 only received nine written submissions for four trades. Through that review process, two trades ratios were changed and two stayed the same. In one instance, the Review Panel felt there was not enough evidence to form a decision. The second (B) round of ratio reviews in the fall of 2012 saw no increase in participation, with a paltry average of three submissions per trade. During the third (C) round, the number of submissions did increase, but for those trades with more active stakeholders, such as plumbers and electricians.

Problem: Apprenticeship ratio review decisions are being made in a data vacuum.

Gaps in data plague the ratio review process. Ontario does not have sufficiently sophisticated labour market data, particularly with respect to current and projected skills shortages in varying sectors. This absence of data hurts the ability of government, including the College and the Ratio Review Panels, to craft effective evidence-based policies that reflect labour market realities.

Ratio Review Panels make decisions based on eleven criteria by which they judge all written and oral submissions. These criteria includes the impact of a ratio change on the environment, the economy, and the labour supply, the health and safety of workers and the public, and the number of apprentices in training programs and working in the trade.

Ratio Review Panels claim that making informed decisions is difficult for them due to a lack of data in the submissions they receive (RR3-2012). Conversely, the Ontario Home Builders' Association (OHBA) argues that the College does not provide sufficient data upon which they can base their own submissions.

Despite this, the College stresses that it is, "not responsible for gathering data and providing it to the broader community for use in the ratio review process. For better or for worse, that responsibility lies with those persons who wish to participate in these Reviews" (RR1-2012). In short, those who wish to participate in the process are responsible for mining the various sources of information in the community and securing data to support their positions.

Thus, parties making submissions to Ratio Review Panels must look to other sources, usually the Ontario Ministry of Training, Colleges and

Universities (TCU). But TCU's data is extremely limited. For example, TCU does not provide information about where workers are located, which makes it difficult for Ratio Review Panels to gauge the economic and labour market impact of ratio changes across geographic regions in Ontario.

Poorly informed ratio decisions diminish the labour supply of skilled trades people in Ontario's rural and northern communities, which are less likely than other regions to have large unionized companies able to take on new apprentices. Northern Ontario is poised for a period of unprecedented growth but it is plagued by labour and skill shortages. According to a recent OCC survey, at least 45 percent of employers in Northern Ontario have had difficulty hiring an individual with the right qualifications (OCC Membership Survey January/February 2013).

RECOMMENDATION 1

Journeyman-to-apprentice ratio review decisions should be evidence-based and grounded in robust quantitative and qualitative analyses of key economic and labour market impacts.

Journeyman-to-apprentice ratio review decisions should be evidence-based.

The OCC urges the Government of Ontario to do a better job of generating and providing data for use in the apprenticeship review process. The shortcomings of available data were identified early on within the Armstrong Report (2008). In his report, Armstrong states that, "except for material relating to economic impact—and despite the volume of writing on apprenticeship—the data in the possession of government ministries and agencies on the other impact issues covered by my mandate are largely incomplete, of uncertain accuracy, or non-existent."

The Government should generate and share data and information to foster greater understanding of the economic and labour market impacts of journeyman-to-apprentice ratios. In doing so, the Government should also look to other jurisdictions, such as British Columbia, who have lowered their apprenticeship ratios to reflect labour market demands while maintaining high levels of worker health and safety.

As per the Drummond report, the Ontario Government should advocate for the collection of sub-provincial data in all future federal surveys on labour vacancies (Drummond, 2012).

Problem: Biases exist within the ratio review process that limit participation.

There is a lack of employer representation in the ratio review process, particularly from SMEs. The lengthy and arduous requirements placed on both written and oral submissions, including the requirement for participants to provide their own data, prevents employers with limited resources from participating in the process.

By their very nature, the stakeholder submission process creates more space for those organizations that are large and well-organized. Written and oral submissions to the College are submitted predominantly by unions and business/trade associations. Unions and business/trade associations have superior resources and greater capacity to influence the decision-making process than smaller employers and individuals.

The College recognizes the asymmetries of resources among affected parties. The Review Panel for Floor Covering Installer (RR1-2012) acknowledges the particular resource imbalance between unions and employers in the decision-making process: "We appreciate that there may be a resource imbalance between unions and employers in this process.... There is nothing that the Review Panel can do to alleviate an imbalance of that nature. Nor can the College."

Since reviews are based on information provided in submissions, the quality of comments has the ability to influence the probability that the Review Panel will incorporate proposed changes into their final ruling. As such, it is more likely that association and union interests will enjoy disproportionate influence over outputs.

RECOMMENDATION 2

The journey-person-to-apprentice ratio review submission process should be less onerous. The College should actively solicit participation from smaller and rural players.

The Government of Ontario must ensure that ratio review decisions are evidence-based.

Simply posting the criteria for written submissions on the College's website is not enough to garner robust participation in the review process. Greater effort should be made by the Review Panel to solicit input and perspectives from smaller employers, including those in rural communities. This can be accomplished without an increase

"Resource imbalances are not uncommon in judicial, quasi-judicial, and administrative proceedings. There is nothing that the Review Panel can do to alleviate an imbalance of that nature. Nor can the College."

(RR1-2012)

in fees to members. Requirements placed upon written submissions should also be made more accessible for those stakeholders with limited in-house resources.

RAISE THE BAR ON DESIGNATION

The College's is mandated by law to consider applications that seek to change the certification of trades from voluntary to compulsory. A compulsory trade is one in which workers must acquire a certificate of qualification from a government-accredited school in order to perform work in that trade. Currently, 22 of the 156 trades under regulation by the College are compulsory.

The trade classification review process begins at the request of the trade board representing a particular trade and its classification, and is similar to the ratio review process. Once the review is initiated, interested parties are invited to present an opinion on the classification of the trade.

The College takes a number of factors into consideration when classifying a trade as compulsory, including the scope of the practice of the trade, the health and safety of workers, and the attraction and retention of journeypersons and apprentices.

Again, despite the assumed neutrality of the trade classification process, there are significant problems.

Problem: The trade classification process lacks transparency and is biased toward increasing the number of compulsory trades.

The OCC is concerned that without a transparent and robust trades classification process, the College will take the route of similar provincial regulatory bodies, which have used rising fees to cover spending plans. The costs associated with creating the bureaucracy needed to enforce the regulations and run the College will soon exceed the capacity of workers and employers to pay for the College through annual fees. As such, the College has bureaucratic and financial self-interests in expanding the number of trades subject to membership fees. We note, with trepidation, that one of the College's strategic objectives is "to promote the College of Trades and build its membership."

The implications of expanding the range of compulsory trades has not yet been fully analyzed, nor adequately debated. Decisions regarding the classification of trades are particularly important to the Ontario economy, as compulsory certification is more expensive to employers and apprentices (and therefore consumers). In particular, compulsory certification has the potential to have a disproportionately negative impact on SMEs.

The College has bureaucratic and financial self-interests in expanding the number of trades subject to membership fees. We note, with trepidation, that one of the College's strategic objectives is "to promote the College of Trades and build its membership."

The expansion of the compulsory trades may have other far-reaching implications. It could erect barriers to labour mobility in-flows to Ontario, making it more difficult for Ontario employers and labour organizations to bring qualified workers to the province from other jurisdictions.

Under the current governance structure, it is unclear what institutional checks are in place to ensure that trade classification panels will not arbitrarily increase the number of compulsory trades without robust analysis.

RECOMMENDATION 3

The trade classification process must be based on robust data, analysis, and a fair review process. The bar for designating a trade must be very high, requiring substantially more than a plurality of affected parties.

All decisions about compulsory trades should be transparent and subject to high decision-making thresholds. In other words, a mere plurality of directly affected parties is insufficient, particularly in a context where data is in short supply.

Decisions to expand the number of compulsory trades must be based on a robust process of research and data collection, and include substantial stakeholder buy-in. The College should solicit input from all interested parties, including those who have a stake in keeping a particular trade voluntary.

Furthermore, each decision should be subject to a detailed and public cost-benefit analysis.

ADDRESS THE “LEGITIMACY PROBLEM”

Public discourse regarding the ratio review process and the College itself has been negative, due in part to misinformation and a lack of transparency. Employers and workers need to know what they are getting for their money.

Greater transparency, particularly from ratio reviews and trade classification outcomes, could go some distance in improving the perception of the College. We identify important additional steps that will improve the receptivity of stakeholders.

RECOMMENDATION 4

Ratio review and trade classification processes and outcomes must be transparent, with support and opposition clearly tracked. Results of ratio reviews must be aggregated and easily accessible to the public.

The College is required to post all apprenticeship ratio review written submissions on its website following the submission deadline. Each Review Panel then reports its decision to the Board of Governors, which is then posted online for public viewing.

Although ratio review outcomes exist in individual reports, there is no simple way for the public to see the progress the College has made as a whole. Instead, each Review Panel decision must be accessed through a separate report, which impacts both transparency and legitimacy.

As the initial ratio review process approaches completion, there is a strong need for transparent and accessible communication of the outcomes to both those within the skilled trades and the general public. Information—including changes in ratios, dates effective, and the number of submissions per trade—should be communicated to the public in an easy-to-access and digestible format.

RECOMMENDATION 5

More robust measuring and reporting on the College's performance is required, particularly with respect to addressing skills shortages.

Under the *Ontario College of Trades and Apprenticeship Act, 2009*, the College is merely required to report to the government, annually, on its financial position and activities. The OCC urges the government to determine, in collaboration with stakeholders, the critical objectives and subsequent performance measures by which to evaluate the College. The College should be required to measure and report its effectiveness against those factors, even if this requires a legislative amendment.

The College is mandated to review journey-person-to-apprentice ratios every four years. As Ontario's economy and labour force undergoes transition, this is not sufficient. Instead, the OCC encourages a process by which ratio decisions are reviewed by Review Panels on an as-needed basis. As well, TCU and the College should work together to report

annually on the number of graduates from apprenticeship programs, as well as the number of graduates who find full-time employment in their field.

RECOMMENDATION 6

Greater emphasis should be placed on attracting youth to skilled trades careers, a critical component of the College's mandate that is currently unfulfilled.

An important part of the College's mandate is to promote the skilled trades to youth and under-represented groups as a viable and attractive career path. Our members, however, feel that this component has been neglected.

This part of the College's mandate is critical to filling the skilled trades shortage in the province. As such, the OCC recommends that the College create and execute (and make public) a plan to promote the skilled trades to Ontario's youth, as well as an effective means to measure its success.

CONCLUSION

Ontario requires a workforce that is highly skilled and adaptable if it is to succeed in the global economy. The OCC is confident that the province has all the assets it needs to secure its position as the best place to invest, work, live, and do business. But we need to act collectively, strategically, and with purpose to leverage these assets.

The Ontario College of Trades has the potential to help Ontario build a 21st century workforce. However, the OCC is concerned that, in its current form, the College is poorly positioned to help address skills shortages and meet the needs of employers.

Acting on the recommendations identified in this paper would go some distance in resolving the College's problems.

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APPENDIX: OCC RESOLUTIONS

A. FIXING THE ONTARIO COLLEGE OF TRADES

Submitted by the Greater Sudbury Chamber of Commerce

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Ensure that the Ontario College of Trades Board clarify the process by which compulsory and non-compulsory trades are determined; if a trade goes from non-compulsory to compulsory, what precipitates this process and what is the transition process criterion?
2. Ensure that any employer representative on the Ontario College of Trades Board must not have membership in a union, and immediately review the terms of reference of the Ontario College of Trades as it pertains to their independence from external influences.
3. Determine critical success factors to measure and report the effectiveness of the Ontario College of Trades and report on the abilities of trained apprentices to obtain jobs.
4. Ensure the role of the Ontario College of Trades does not place undue bureaucratic processes, additional fees or hardship on the development and attraction of tradespersons.

B. INCREASING SKILLED TRADES

Submitted by the Greater Kingston Chamber of Commerce and the Prince Edward County Chamber of Commerce

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Ensure that the Ontario College of Trades is equipped with a participatory and inclusive governance structure that will enable the review of apprenticeship ratios to be based on an objective analysis of the impacts on all participants in the apprenticeship system, including current and future apprentices and employers. At minimum, the regulations governing the College must stipulate that:
 - a. Review panels be representative of the broader make-up of the trade, including employee and employer representatives of both union and non-union affiliation, and, where possible, regional diversity and business size;
 - b. The review process include input by all interested parties (applicant, other trade boards, members, non-members, unions, associations, the general public etc...) through a transparent

public consultation, which tracks and registers the degree of support for each position; and

- c. Each decision be based on an objective quantitative and qualitative analysis of key economic impacts, including the effects on labour supply and small and medium businesses.

C. REFORMING ONTARIO'S APPRENTICESHIP SYSTEM

Submitted by the Woodstock, Greater Sudbury, Thunder Bay, and Guelph Chambers of Commerce

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Immediately implement a coordinated apprenticeship reform program to move to a minimum 1 to 1 apprenticeship ratio.
2. Initiate a five-year pilot project that would see Northern Ontario employers have the opportunity to train using three apprentices to one journeyman ratio.
3. Implement a strategy to aggressively reform ratios to mirror apprenticeship programs in British Columbia and Alberta, to make Ontario competitive with jurisdictions that are drawing our talent away from Ontario.
4. Immediately begin coordinating federal and provincial funding initiatives to meet skilled labour demands through education and incentives for employers.

UPCOMING OCC POLICY RELEASES

Fall 2013	Report on the WSIB
Winter 2014	Emerging Stronger 2014
Winter 2014	Report on the Ring of Fire
Spring 2014	Report on the future of public service delivery

