

September 16, 2021

Mr. Andrew Mercier  
Member of the Legislative Assembly for Langley  
Parliamentary Secretary for Skills Training  
British Columbia Government  
Victoria, B.C.  
V8V 1X4

Dear Mr. Mercier,

**Re: British Columbia Government's New Skilled Trades Certification System**

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The British Columbia government announced on June 11, 2021 its intention to implement a Skilled Trades Certification (STC) system, beginning with 10 trades within the electrical, automotive and mechanical sectors. On behalf of our 8 local associations and over 2,200 residential construction members, the Canadian Home Builders' Association of British Columbia (CHBA BC) would like to thank you for engaging us in the consultation process and seeking our feedback on how the STC system and its transition should be designed to support workers and employers.

It is our understanding that consultation is being conducted by both the B.C. government, and the Industry Training Authority (ITA), who is charged with overseeing B.C.'s apprenticeship system and will play a leading role in the implementation of the new system. CHBA BC is aware that ITA launched a separate engagement process to understand the impacts, concerns and insights of groups and individuals who will be directly affected by the proposed changes. Members of our association have been contacted to participate in this process. Following the engagement period, the B.C. government will release a final report with recommendations during the Fall of 2021.

Skilled trade workers are essential to building homes. According to BuildForce Canada, new housing and residential renovation and maintenance accounted for 55% of construction employment across the province in 2021. With the forecasted challenge of replacing an aging labour force where more than 41,000 workers will retire over the next decade, construction industry employment would need to grow by 17,800 workers in the next 10-year period to keep pace with anticipated construction activity.

CHBA BC continues to hear from its members the daily challenge of securing labour for their housing projects, and the difficulties with capturing the interest of new, younger workers to the field. Our association and members believe there is a role the STC system can play in

overcoming these labour challenges, but it must be done with thoughtful, careful consideration and a level of flexibility to respond to the dynamic needs of the economy and industry as we rebuild.

As you prepare your final report and proceed with implementing the STC system, CHBA BC believes the B.C. government and ITA should take on the following approach to ensure employers and workers, current and future, are supported by this new compulsory system.

### **1. Create a seamless transition process that recognizes practising workers**

The ITA has indicated that for unregistered workers, upon implementation of the program, they will have a period to register with an employer sponsor where a certified tradesperson can support the apprentice or challenge the process to obtain certification. The rollout of the STC system should include a transition process that is simple and recognizes the number of years an individual has practised within the trade in question, as well as what stage of their career they are in.

**If these realities are not considered carefully, CHBA BC is concerned that the STC system will trigger current workers to exit the labour market, or participate in the underground economy.**

Those who have more than 5 years of demonstrable, practical work experience should be able to receive their certification under this system. This would be similar to the Prior Learning Assessment and Recognition (PLAR) program in Ontario, which is used to determine whether an approved apprenticeship applicant or an apprentice may be exempted from some or all formal instructions requirements of the relevant trade. British Columbia may benefit from implementing a program like this.

### **2. Ensuring the training system is well-resourced and maximizes opportunities to grow skilled trades careers**

This would include introducing appropriate journeyman-to-apprentice ratios, as well as resourcing training schools to meet enrollment and course demands and ensuring the curriculum is regularly reviewed for its relevance to industry practices.

Regarding ratios, because journeymen are responsible for all on-the-job training of apprentices, the setting and regulating of these ratios are meant to benefit quality of training as well as help control labour market supply. In a 2013 C.D. Howe Institute report entitled, *Access Denied: The Effect of Apprenticeship Restrictions in Skilled Trades*, it was found:

*“... that the strictest provincial apprenticeship restrictions substantially reduce the number of people working in a trade: provinces that impose tight restrictions have 44 percent fewer workers in those trades than provinces that have no restrictions. As well, in provinces that require a firm to have more than one journeyman for every apprentice it hires, there are relatively fewer young workers in the trades.”*

*(Brydon & Dachis, 2013, p. 2)*

While CHBA BC will be withholding comments at this time on what an appropriate journeyman-to-apprentice ratio should be for the identified trades, given the constraints for workers today, it is imperative that the B.C. government and ITA consider ratios that do not overburden employers (particularly those that are small- and medium-sized) and are set to retain the interest of younger workers.

**Access to the training system remains a crucial component of the STC system that needs to be thoroughly reviewed by the B.C. government and ITA.**

CHBA BC members have expressed that skilled trade courses can be outdated and/or have a long waitlist of applicants wanting to enter a trade (ie. carpentry). Or, alternatively, there are instances where students cannot be accommodated for a trade that demonstrates low enrollment rates (ie. HVAC). Training programs that provide more practical experience as opposed to classroom settings and testing (unless it is required for more technical work and/or safety protocols) also present opportunities to grow the skilled trades labour force.

The STC system should address the above-noted problems, as they continue to pose a barrier to those pursuing a career in skilled trades and subsequently straining our industry's ability to deliver housing supply. While this may not be the case with the 10 trades currently identified for designation, the principle still holds importance and should be accounted for when considering future designations.

Funding is also a key consideration to be made, and the ITA would require significant funding in order to maximize operations in this new system. The province should provide dedicated funds in this regard and have monies earmarked to attract those into the trades and support them completing the process.

### **3. Clearly defining the trades, scope of allowable work and enforcement protocols**

CHBA BC is aware that the B.C. government and ITA will be undertaking work to define the 10 designated trades and the related work allowed under certification. This is a crucial component as it will dictate enforcement and compliance measures taken.

When defining the scope of work, the B.C. government and ITA should focus on significant work that require a certain level of technical knowledge, specific skill sets and present significant health and safety risks. Often, employers hire “helpers” that assist a certified tradesperson with a tasks (ie. welders) which could include work as simple as transporting material. This type of work is typically suited for younger workers, or students, who are looking for part-time work or want to explore a specific trade as a future career path.

**It is important for the trades to be defined using language that accounts for the above instances as it is expected that enforcement officers will rely on this language when conducting compliance checks.**

There needs to be a clear understanding of what work is allowed and not allowed between a certified and uncertified worker for all involved parties.

#### **4. Appropriate designation of future trades**

While CHBA BC was encouraged to see the B.C. government take on an incremental approach to the STC system by starting with 10 trades, we are closely monitoring the details of the implementation approach and how other trades will be designated in the future. CHBA BC members do not believe that every trade should be compulsory.

#### **Concluding Remarks**

Thank you again for the opportunity to engage in this process and we look forward to receiving further information and updates on the process. Should you have any questions, please feel free to contact the undersigned.

Sincerely,



Carmina Tupe, MCIP RPP  
Director, Policy & Government Relations  
**The Canadian Home Builders' Association of British Columbia**

*Cc: Jeff Hannah, Ministerial Advisor, Ministry of Advanced Education & Skills Training  
CHBA BC Local Association Executive Officers*