



The Honourable Patty Hajdu  
Employment and Social Development Canada  
90 Elgin Street  
Ottawa, ON K1A 0G5

**Re: Canadian Construction Association – Submission to the Targeted Consultations on Building Canada Strong for All – Powered by Canada’s Workers**

Submitted via email: [esdc.nc.labour.consultations-travail.nc.edsc@hrsdc-rhdcc.gc.ca](mailto:esdc.nc.labour.consultations-travail.nc.edsc@hrsdc-rhdcc.gc.ca).

Dear Minister Hajdu,

In the government’s 2026 Spring Economic Statement (SES), it sent a clear signal to construction workers and the industry that it is time to build. However, until this point, much of the government’s building agenda has lacked a clear workforce strategy to transform these commitments into the major infrastructure, housing, and defence projects needed to drive Canada’s economic growth and strengthen the country domestically and internationally.

We appreciate the opportunity to participate in this consultation on ways to Build Canada Strong for All – Powered by Canadian Workers. As the national voice of the construction industry, the Canadian Construction Association (CCA) represents 18,000 member firms through an integrated structure of 57 local and provincial partner associations. At the heart of our industry are the more than 1.6 million people who build the country’s homes, hospitals, and infrastructure, contributing approximately \$162 billion annually to the economy and accounting for 7.5 per cent of Canada’s gross domestic product (GDP).

We thank the government for inviting us as a stakeholder to provide industry insights on additional measures to strengthen labour relations and support the construction industry. We reiterate that any policy or fiscal support extended should encompass all construction workers, unionized and open-shop alike. At the same time, given that most construction labour regulations are provincially regulated, there must be significant coordination through a whole-of-government approach. This will help ensure that any amendments to the *Canada Labour Code* can be seamlessly harmonized across jurisdictions, minimizing friction and enabling workers to deliver projects faster and at scale.

**Labour mobility**

CCA advocates for the right of qualified construction workers to seek employment in any region of Canada without restriction. However, in practice, realizing this right is more complex. Construction is a highly diverse industry, marked by sectoral and occupational differences that result in varying levels of labour mobility depending on certification requirements, type of work, and job structure.

According to Statistics Canada, apprenticeship registration remains the strongest indicator of labour mobility for construction workers. The significant time commitment required to earn that certification, combined with the fact

that apprenticeships do not transfer easily between jurisdictions, means individuals are more likely to remain registered in the province where they completed their training. Given that provinces and territories administer apprenticeship systems, it is unsurprising that 95 percent of workers register and remain in the province where they received their training.

In addition, the implications of immigration policy on labour mobility are not fully recognized, despite being covered under the *Canada Labour Code*. To effectively meet the speed and scale of the government's building agenda, immigration plays a complementary role in supplementing the workforce. Future policy rollouts should therefore recognize that immigration regulations often tie work permits to a person's province of residence or employer, thereby restricting overall mobility for a segment of the workforce.

### **Emphasis on Red Seal**

The government has chosen to prioritize investment in the skilled trades, specifically Red Seal designated trades, to galvanize the workforce needed for their 'Team Canada Strong' (TCF) initiatives. The rationale makes sense, given that Red Seal credentialling offers a streamlined pathway that facilitates interprovincial mobility. However, this approach has its limitations.

Firstly, this program operates differently in Quebec, which limits full national representation. Secondly, while the Red Seal program enables free movement for certified and endorsed candidates, only 54 trades out of roughly 300 are officially recognized under the program. Furthermore, even among the 54 Red Seal trades, provinces retain discretion over which trades are recognized in their jurisdictions. Oftentimes, this means that workers must ensure alignment of certification across different provincial requirements in order to work across borders – ultimately weakening labour mobility outcomes overall due to excessive complexity.

### **Workplace health and safety precautions**

A major barrier in Occupational Health and Safety (OHS) protections is the significant fragmentation and inconsistent application of standards across all levels of government. As it stands, there are 14 separate occupational health and safety frameworks in place: one federal, 10 provincial, and three territorial. While robust health and safety regulations cannot be dismissed, the current system in which they operate imposes duplicative and bureaucratic burdens that could be reduced through greater harmonization across all levels of government.

At a more granular level, larger firms typically have greater resources to develop and maintain their own OHS management system. In contrast, small and medium-sized enterprises (SMEs) often have less capacity to invest in developing comprehensive OHS systems, as available resources are generally directed towards project delivery. This highlights a broader issue: fragmentation in OHS standards can create uneven compliance burdens, leading to inconsistent application and protection. Workplace health and safety precautions must be upheld as fundamental rights rather than privileges dependent on organizational capacity and technical resources.

### **Access to training supports**

A notable gap identified by our industry is the lack of codified pathways between unionized training and the open-shop workforce sector. Despite open-shop workers representing approximately 70 percent of the construction



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workforce, there are fewer formalized training avenues available to them compared to their unionized counterparts. This lack of accessibility not only excludes most of the construction workforce but can also cause delays throughout the construction pipeline.

From apprentice progression and completion to overall workforce retention and growth, CCA emphasizes the importance of representative funding parity, including fair and equitable access to training as an avenue to close the training gap.

Lastly, accessibility and accommodation for construction training in various languages is another important consideration. While we have previously noted that language requirements are often overstated for the industry's needs, there is a practical level of comprehension required to understand signage on an active worksite. Particularly as one of the government's economic priorities is increasing the intake of French-language-proficient workers outside Quebec, full language accessibility must be provided to ensure safety and a seamless integration and transition into the workforce.

### **Conclusion**

On behalf of CCA and our membership, we thank you for the opportunity to participate in this Targeted Consultation on Building Canada Strong for All – Powered by Canada's Workers. Canada's future depends on the people building it, and the construction industry looks forward to continued collaboration with the government to address barriers to entry, strengthen pathways, and improve the supports available to those seeking a career in construction.

We welcome the opportunity to meet with you and your team at a mutually convenient time to discuss the contents of this submission further.

Best regards,

A handwritten signature in blue ink, appearing to read 'R. Gilbert'.

Rodrigue Gilbert  
CCA President