



The Honourable Lena Metlege Diab
Immigration, Refugees, and Citizenship Canada
365 Laurier Avenue West
Ottawa, ON K1A 1L1

Re: Canadian Construction Association – Submission to the 2026 consultations on potential Express Entry reform

Submitted via email: IRCC.Minister-Ministre.IRCC@cic.gc.ca

Minister Diab,

As the government seeks to accelerate the delivery of major projects, housing, and nation-building infrastructure to Build Canada Strong for all, only recently has there been recognition that Canada lacks a sufficient workforce to fulfill that promise. While the commitment to train, hire, and recruit young Canadians domestically to fill that gap is welcome, it will take decades to close the labour supply gap. In the absence of targeted immigration, the risk of failing to meet construction needs at the speed and scale required by the economy will remain significant.

As the national voice for Canada’s construction industry, the Canadian Construction Association (CCA) represents 18,000 member firms through an integrated structure of 57 local and provincial partner associations. Our industry employs over 1.63 million people and generates approximately \$170 billion for the economy annually, accounting for 7.3 per cent of Canada’s gross domestic product (GDP) – a substantial contributor to Canada’s economic growth. We welcome the opportunity to provide input on potential Express Entry (EE) reforms, which have long been a priority in CCA’s workforce development advocacy. At a time when the government has emphasized the delivery of major and nation-building projects, meaningful reform to the EE system must reflect labour market demand, rather than remain mere rhetoric.

That said, it is important to note the constraints of this consultation. Given the broad scope of EE reform, an online survey is inherently limited as a feedback mechanism. Multiple-choice questions cannot fully capture the nuance of industry stakeholders’ perspectives and experiences within the EE system. We are concerned that the limited opportunity to provide detailed feedback on the operationalization of such consequential changes to EE may obscure important policy considerations and risk unintended outcomes.

Please note that this submission is structured according to the headers in IRCC’s discussion paper, with comments focused on the proposed changes most relevant to construction.

Simplifying program requirements

In principle, we believe that streamlining the EE program is long overdue. However, whether these proposed changes achieve their intended outcomes will ultimately depend on how the specific measures are designed and applied. From a high-level perspective, consolidating all three streams into one is logical. In practice, however, the IRCC selection process has already functionally converged into a single draw system, with the Canadian Experience Class (CEC) being the only stream regularly selected. In contrast, the Federal Skilled Worker Program (FSWP) and the Federal Skilled Trades Program (FSTP) have not been drawn since 2023 and 2020, respectively. As such, if IRCC is already operating under a de facto single stream model, CCA is concerned that further streamlining the system will only serve to formalize the status quo without meaningfully addressing Canada’s labour market needs.

However, if the intent is to facilitate more construction-focused immigration through category draws rather than the general stream, CCA recommends that this approach be developed in close consultation with industry to ensure a regularized draw plan and that candidate profiles accurately reflect labour market needs.

Language proficiency requirements

The new proposed program would require: (1) a Canadian high school diploma or foreign equivalent; (2) an intermediate language ability in reading, writing, speaking and listening; and (3) one year of skilled work experience in Canada or elsewhere in the past three years. While these streamlined requirements intend to consolidate and avoid duplication of criteria across programs, the baseline requirements do not appear to alter underlying selection dynamics. Given that IRCC plans to continue awarding points for post-secondary education and higher levels of English and French proficiency, this implies that the new system may continue the old trend of prioritizing high human capital candidates.

Moreover, the new program criteria require Canadian Language Benchmark/Niveaux de compétence linguistique canadien (CLB/NCLC) level 6 for reading, writing, speaking, and listening, reflecting a consolidation of the previous three program language requirements. While this harmonization may simplify administration of the program, this benchmark exceeds what would be required to work on a construction job site. Construction does require a baseline proficiency in either French or English to meet health and safety standards, but this can still be achieved at lower language requirements. For example, the FSTP's language requires CLB/NCLC level 5 for speaking and listening, and level 4 for reading and writing, more accurately capturing the practical language skills needed to work in construction. Arbitrarily raising the language benchmark may preclude many otherwise qualified construction workers from clearing the minimum requirements. Not only does this continue to prioritize high-skilled workers, but it also fails to justify its impact on the industry in terms of safety or productivity gains.

Recognizing Canadian licences in regulated occupations

CCA appreciates and welcomes the focus on skilled trades through initiatives such as 'Team Canada Strong' (TCS). However, it is important to distinguish between skilled trades and the construction workforce more broadly; while there is overlap, they are not synonymous or interchangeable. While it is understandable that IRCC would want to focus on regulated certifications and licenses, "accepting only certificates for Red Seal designated trades" delegitimizes the contributions of other construction workers who play a significant role in getting a project off the ground.

Red Seal trades, while important, do not capture all skilled trades or the construction workforce. The program covers only 54 designated trades and is not available nationwide because Red Seal is not operational in Quebec. While the government points to skilled trades workers as essential to delivering major infrastructure projects, its exclusive credential recognition system excludes civil construction, the sector responsible for designing, building, and maintaining public infrastructure. Most trades in civil construction do not formally qualify as apprenticeships; thus, the arbitrary tightening of these requirements is difficult to justify, particularly when the point allocations may end up excluding large portions of the workforce needed to deliver the infrastructure at hand.

High-wage occupation factor in the CRS

Our industry is proud to offer high-paying, stable, and rewarding careers for those who want to build our country. The introduction of high-wage occupation points could therefore benefit the construction sector. However, much



Canadian Construction
Association
Association canadienne
de la construction

will depend on how the government defines “high-wage” and how this benchmark is applied in practice. While CCA understands the government’s intent to reduce fraud by narrowing the scope of bonus points, we would like to emphasize that additional points should be awarded to applicants who would fulfil a great need in the Canadian economy. The examples given of university professors and physicians, while high earners, are also highly educated, reinforcing the flaw in the previous system: equating economic success with higher education discriminates against the typical profile of construction workers.

Moreover, the October 2024 changes to the Temporary Foreign Worker Programme (TFWP) illustrate the risks associated with wage-based thresholds. While the initial changes had limited impact on construction, the effects became more significant once the government introduced restrictions on the high-wage stream and increased the threshold to 20 per cent above the provincial median hourly wage. This example demonstrates the broader concern with introducing an additional factor in the CRS: if the goalpost can be moved arbitrarily, it may disproportionately affect construction and ultimately reduce EE’s competitiveness with construction workers. It is therefore difficult to reconcile the government’s proclaimed urgency to “Build Canada Strong” with the continued underutilization of immigration pathways that would facilitate the intake of construction workers.

Conclusion

On behalf of CCA and our membership, we thank you for the opportunity to participate in this consultation and share the construction industry’s insights and experience with the EE reforms. We have long noted that construction – including homes, hospitals, schools, and trade corridors – cannot be fast-tracked without the workforce to deliver it. As the government advances its ambitious building agenda, it is essential that the concerns outlined above are addressed, including through continued engagement with industry stakeholders, to ensure future immigration reforms enable the industry to thrive rather than constrain it.

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

Regards,

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

Rodrigue Gilbert
CCA President

CC: Ted Gallivan, Deputy Minister, Immigration, Refugee and Citizenship Canada