

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 immigration levels**

**Submitted via email: [IRCC.Minister-Ministre.IRCC@cic.gc.ca](mailto:IRCC.Minister-Ministre.IRCC@cic.gc.ca)**

Minister Diab,

As stated by the government, “building a strong Canadian economy requires an immigration system that is sustainable and responsive to labour market needs.” Yet, as the government seeks to fast-track the delivery of major projects, housing supply, and nation-building infrastructure over the next five to 10 years to transform Canada’s economy into one that is more self-sufficient and resilient, its federal immigration strategy has not developed in a way that efficiently supports these priorities.

As the national voice of the construction industry, the Canadian Construction Association (CCA) represents more than 18,000 member firms through an integrated structure of 57 local and provincial partner associations. Construction is a key driver of the Canadian economy, employing 1.6 million people, generating approximately \$162 billion in annual economic activity, and accounting for 7.5 percent of Canada’s gross domestic product (GDP).

The industry believes that immigration policy should be flexible and respond promptly to labour market needs. While much of the discourse has centred on intake levels, less attention has been paid to the strategic targeting of the newcomers Canada seeks to welcome. CCA has long noted a fundamental paradox: projects cannot break ground, or be expedited for that matter, without a robust workforce to facilitate it. As such, the industry is advocating for a two-fold approach to construction workforce development:

- 1) Streamlining immigration processes to align newcomer skillset with labour market needs, and
- 2) Investing in initiatives that foster long-term societal changes to develop a robust domestic construction workforce pipeline.

Please note that this submission is structured according to IRCC’s survey on immigration levels, with comments focused on the themes that are most relevant to construction.

### **Domestic workforce versus immigration**

The workforce crisis that the construction industry has been facing did not emerge overnight. It stems from decades of defunding shop programs in schools and sustained societal discouragement from pursuing a career in the trades in favour of university pathways. As a result, the sector is in a position where we simply do not have

enough workers to meet the government's demand for construction at the speed and scale it is requesting. While our members have been at the forefront of recruitment efforts through partnerships with schools, the development of workshops to encourage natural uptake among youth across Canada, and our national campaign Talent Fits Here that promotes careers in construction, changes to workforce participation that have a meaningful impact on the labour supply will take decades to materialize.

Given the long-term nature of domestic workforce development, immigration is needed to supplement the workforce in the short term. This becomes even more pronounced when we consider that the government aims to expedite project timelines over the next two to five years, an objective that far outpaces the industry's ability to scale the construction workforce purely through domestic growth.

#### **Challenges, barriers, or concerns exist in the immigration system**

As such, immigration levels should be targeted to sectors with the greatest impact, including construction. In justifying the reduction in immigration levels, the government has emphasized the need to pivot to fill labour gaps and strengthen key sectors of the economy. Given how central construction workers are to delivering the government's vision of catalyzing major and nation-building projects, it would be difficult to contend that construction does not meet this threshold.

This points to a broader issue: while the trades are continually emphasized as a priority for the government's immigration strategy, the absence of a commitment to targeted draws or regularized intake sends a mixed signal. Despite the government's increased demand for construction with expedited timelines, construction is notably excluded from the three immigration commitments. In contrast, other priority categories, such as Francophone admissions, have been explicitly codified. As demand for construction continues to grow, it becomes increasingly difficult to reconcile a policy environment that rapidly accelerates project expectations for the industry without codifying or supporting pathways, resources, or workforce supports to deliver on these objectives.

As it stands, proceeding with major nation-building projects without workforce interventions, particularly through immigration, is likely to delay timelines, drive up costs, and potentially divert resources and labour from other critical projects across the country. This will have consequential downstream effects across the entire construction pipeline, exacerbating existing pressures and further entrenching our industry in a boom-and-bust cycle that runs counter to the goal of building a strong Canadian economy.

#### **Future temporary to permanent levels**

Construction has long noted that overreliance on temporary immigration is misaligned with the realities of our industry. When newcomers arrive in Canada, the construction industry invests significant time and resources into their skill development for a Canadian construction context. This is valued by our industry and should be proportionally reflected and reinforced as a strategy within the immigration system, especially as permanent immigration brings more certainty and sustainability to the construction workforce.



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However, the government's policy commitments appear to set levels in inverse proportion. The proposed levels aim to set the permanent population to less than one per cent of the total population after 2027, while only reducing the temporary population to less than five per cent in that same timeframe. If the objective is to build the housing and infrastructure needed to support Canada, reinforcing a start-stop mechanism for construction workers runs counter to this goal. Instead, it reiterates a pattern in which construction, and ultimately the broader economy, is forced to bear the cost of repeated sunk investments in temporary candidates, serving no benefit to getting projects off the ground or addressing the workforce crisis.

### **Long-term considerations and priorities**

The government's overarching message has been the need to take back control of the immigration system. CCA recommends that future immigration commitments and levels should be designed to reflect labour market demand, including ensuring that draw activities are regularized and transparent, and that intake targets are evidence-based and set with a clear intention. All this is to ensure clarity throughout this process, which can better support project coordination and planning, promote fair competition in bidding, and improve overall project delivery outcomes across the construction industry.

### **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 perspective on 2026-2028 immigration levels. The industry supports the government's Building Canada agenda, but the immigration strategy to facilitate it remains misaligned with industry realities and government expectations. As we have stated, immigration planning for the construction sector must be more intentional and better aligned with labour market needs than we have seen to date.

Thank you for the opportunity to provide input on this important matter, and would be pleased 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  
President, Canadian Construction Association