



October 21st, 2022

Ministry of Labour, Immigration, Training and Skills
400 University Ave #14,
Toronto, ON M7A 1T7

Sent Electronically

Re: Proposed amendment to Ontario Regulation 422/17 (General), a Minister's regulation made under the Ontario Immigration Act, 2015 relating to the Ontario Immigrant Nominee Program (OINP).

The Ontario Sewer and Watermain Construction Association is Canada's only Sewer and Watermain Association. Ontario boasts an estimated \$229 billion of underground watermain and sewer infrastructure.

The Financial Accountability Office of Ontario estimated that the municipal infrastructure backlog was about \$52 Billion dollars in 2020, much of this backlog is in Ontario's municipal water and wastewater systems. Ontario's infrastructure is aging faster than its ability to bring systems back into a state of good repair. In 2022, the Ontario Chamber of Commerce reported that more than 60 per cent of the organization's members across all labour sectors are 'experiencing difficulty' filling positions in their industry.

Ontario's generational labour shortage is inhibiting its ability to bring core infrastructure back into a state of good repair. Ontario must look towards improving immigration systems as both an interim and long-term solution if it hopes to address urgent infrastructure needs.

The OSWCA recommends the following amendments to O.Reg 422/17:

- The OSWCA supports alignment of the OINP and the new National Occupation Classification (NOC) 2021 system that has already been implemented by Employment and Social Development Canada (ESDC) and Statistics Canada (StatCan) as their official classification system.
- OSWCA recommends amending the "eligibility requirements" for skilled trades workers in O. Reg. 422/17 to include NOC codes 76 and skill level C and D. Ontario is urgent need of tens of thousands of NOC C and D level new Canadians to fulfill its infrastructure priorities.
- The Employer Job Offer Foreign Worker stream should require applicants to demonstrate competency at the Canadian Language Benchmark (CLB) 5 Level in listening and speaking only for NOC C and D level applicants. Excluding NOC code 76 candidates which score less than 5 on CLB in reading in writing will create an additional barrier to migrants urgently needed for the province's infrastructure priorities.

We appreciate the opportunity to provide comments on this important piece of regulation and look forward to working towards program improvement that support the delivery of core public infrastructure.