



## **Submission to the Consultation on Apprentices on Government Funded Infrastructure Projects**

Submitted to the Ministry of Labour, Immigration,  
Training and Skills Development  
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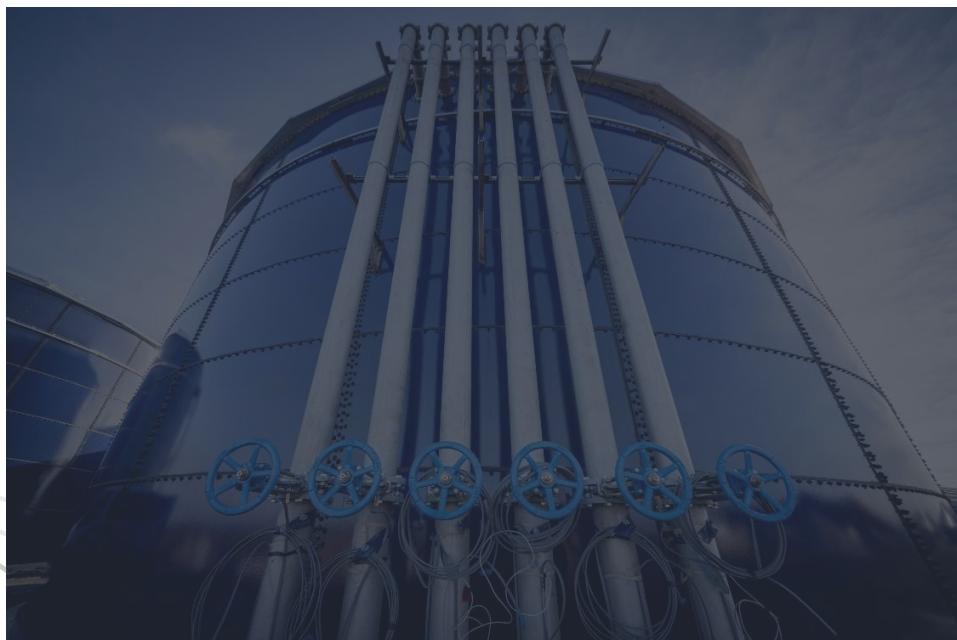


# About PCA

PCA is a national construction association representing more than 150 contractors who employ over 40,000 skilled workers that belong primarily to the CLAC union. We act as the advocate for our members and conduit between government, industry and their affiliated unions to help our members access opportunities and grow their business.

PCA has been at the forefront of the construction industry, representing a collective group of contractors, entrepreneurs, and business owners whose workforces have chosen the progressive unionized model.

We provide our members with action-based advocacy, labour management advice, business-to-business networking opportunities and resources to help them access workers and opportunities to build and maintain capital and infrastructure projects across Canada.



## Introduction

PCA has been a constructive partner to the Government of Ontario on skilled trades policy. We have led extensive policy engagement on modernizing the apprenticeship system, expanding training capacity, supporting group sponsorship, investing in local college apprenticeship training, and removing barriers that restrict workforce mobility and competition.

Against this backdrop, PCA is deeply concerned by the ministry's exploration of procurement-based apprenticeship requirements on government-funded infrastructure projects. While the objective of increasing apprenticeship opportunities is shared, the approach under consideration is fundamentally flawed and risks undermining both workforce development and infrastructure delivery.

The Ontario government has made significant advances in skilled trades training and apprenticeship over the past several years. Winding down the failed Ontario College of Trades, lowering all journeyperson-to-apprentice ratios to 1-to-1, and a commitment to group sponsorship training models have modernized the apprenticeship system. This has resulted in measurable improvements. New apprenticeship registrations in Ontario increased by over 7.3 per cent to 28,875 in 2024–2025, the highest in a decade. Youth, aged 15 to 24, accounted for the largest increase over this period. New registrations in this age group rose by more than 13.5 percent.

Using the procurement system to create new apprenticeship requirements, either through quotas or through a points-based system is a bad idea. It misidentifies the problem, ignores long-standing industry realities, and will lead to significant cost increases with likely zero net benefit to workers.

## Apprenticeship is Already a Business Imperative

Ontario's construction labour shortage is real, acute, and well documented. Employers are hiring apprentices at every opportunity because they desperately need workers. There is absolutely no evidence what so ever, that too few procurement rules are preventing apprenticeship hiring. In fact, the very suggestion ignores fundamental market realities. According to our members, the reason why apprenticeship registrations and completions are not higher are due to a number of factors, most notably, a lack of in-class training capacity at Ontario's local colleges.

Mandating apprenticeship requirements through the procurement system is a significant change in how the construction industry operates. Implicit in this policy proposal is the suggestion that companies working on publicly funded projects are intentionally not hiring apprentices when there is appropriate work available to them. This is incorrect, and is illogical. We socialized this policy proposal with our members and all respondents provided a similar responses that, "Any construction company that wants to survive into the future, must hire and train apprentices, in order have a workforce for the future".

PCA fully supports increasing apprenticeship registrations and completions in Ontario. However, the ministry should first attempt to quantify missed apprenticeship employment opportunities. We submit that there is no excess capacity in the system for additional apprentices in compulsory trades like electrical or plumbing.

If additional proof is required, independent third-party research should examine what sectors of construction could do a better job of hiring apprentices and then establish incentives for employers to be more active, rather than creating more unnecessary regulation and red tape.

## Proposal Will Increase Costs and Delay Projects

This needlessly experimental approach to increasing apprenticeship registrations will backfire. PCA has repeatedly warned government against embedding social or workforce policy objectives directly into procurement rules. Ontario's experience with procurement processes that artificially restrict labour models such as Project Labour Agreements and closed tendering systems, reduce the number of qualified bidders and increase costs. Apprenticeship mandates—whether framed as minimum requirements or scored evaluation criteria—will produce similar outcomes.

Construction companies bid and organize their jobsites based on how they can most efficiently deploy labour, needed expertise on any given project, and coordinate responsibilities on their jobsite. Apprentices are often a major component of the workforce in all compulsory trades where all workers must be registered as apprentices or journeypersons to perform the work. In these settings, the number of apprentices employed by the company must be at or below the regulatory journeyperson to apprentice ratio. Beyond this requirement, companies hire and train apprentices based on the availability of labour. They deploy workers based on the nature of the work. For instance, in highly complex work environments, the company is less likely to have first year apprentices performing the work. Conversely, in less complex work environments, the company may have many first and second year apprentices assisting with the work. The reasons are obvious – namely to ensure workplace safety as well as jobsite productivity.

Also worth noting are major regional differences in Ontario's labour market, that make imposing blanket apprenticeship quotas impractical. A lack of apprentices, especially in rural and remote areas, would have a negative impact, including project delays.

## Compliance

Mandatory apprenticeship quotas will result in significant administrative and compliance costs for government. Regular audits would need to be performed to confirm whether contractors are meeting the apprentice conditions within the contract. These costs would ultimately have to be paid by Ontario taxpayers.

## Sector Differences in Training Approaches are Common

A one-size-fits-all apprenticeship policy is not feasible across Ontario's diverse construction sectors. While apprenticeship requirements may be easy to fulfil (and therefore not necessary to mandate) in compulsory trades like electrician, in voluntary trades, the notion of mandating apprentice involvement across all sectors is massively flawed.

In voluntary trades like equipment operators, labourers, and most civil construction trades, the formal apprenticeship system is almost non-existent. In civil construction, equipment operators and labourers, who comprise of the majority of the workforce, often fall outside formal apprenticeship frameworks altogether. Certificate of Qualification holders and registered apprentices for most heavy machinery is rare to non-existent. This reality does not demonstrate a policy challenge to be fixed, but rather the construction industry's success in training qualified workers on the job and are able to earn high wages early-on in their construction career without going through a full apprenticeship. Shoehorning apprenticeship requirements may appear to accomplish something on paper, but in reality, may actually suppress wages for voluntary tradespeople early in their careers and furthermore creating more regulatory barriers for entrants in these trades. This is not the way to attract, retain and encourage younger generations of skilled trades workers.

## Training Capacity is Already a Problem

The Training Delivery Agency (TDA) model for in-class training for many voluntary trades is run exclusively by union based training centres, the majority of which the head office of these unions resides in the United States. If this model moves forward, it effectively gives certain unions the ability to monopolize apprenticeship labour supply for government-funded infrastructure projects. Case in point, the only training centres across the province for the 'construction craft worker' trade, are those run by an International, US based union. No training programs exist for this trade to service the non-union, or progressively unionized sector.

Applying apprenticeship targets to trades that do not have functional apprenticeship systems would be unworkable and counterproductive. In addition, there is not enough training capacity in the system today. Any artificial increases in apprenticeships will only strain the apprenticeship system further.

## Mandatory Targets and Scoring Models are the Wrong Tools

PCA does not support minimum apprenticeship requirements, trade-by-trade quotas, or procurement scoring systems tied to apprenticeship hiring. These are dated and misguided approaches, that take Ontario's construction workforce in the wrong direction: less innovative, productive and competitive.

These models suffer from the same fundamental flaw: they attempt to regulate workforce composition through contract terms rather than addressing training capacity and labour supply.

If the ministry nevertheless proceeds, it must be clearly stated that:

- apprenticeship expectations cannot apply universally across all trades;
- only compulsory trades with established apprenticeship pathways could even theoretically be included;
- operators, labourers, and other non-compulsory roles must be excluded;
- any targets must apply across the *entire project*, not by trade, sub-trade or sub-contractor;
- expectations must be aspirational goals, not enforceable contractual obligations.

Even under these constraints, PCA remains skeptical that procurement-based models will produce meaningful gains.

## Where Government Should Be Focusing

If the government is serious about increasing apprenticeship opportunities, the solutions are well known and already supported by industry:

- expand in-class apprenticeship training capacity at Ontario's public colleges, which train over 80% of apprentices;
- provide stable, multi-year funding for apprenticeship group sponsorship programs, which have proven to be one of the most effective tools for increasing apprentice recruitment, retention, and completion;
- modernize apprenticeship pathways through multi-skilling and micro-credentials;
- remove procurement and labour barriers that unnecessarily restrict access to publicly funded work

## CASE STUDY: Construction Craft Worker

Using Skilled Trades Ontario's online Trade Information Database, we searched up 'Construction Craft Worker' to understand how few journeypersons are graduating from this voluntary trade. This is important, because in order to train and register an apprentice, you need CofQ journeypersons in order to train any apprentices. The data available on the STO website shows that in 2024, 158 individuals across Ontario received their Certificate of Qualification as a journeyperson construction craft worker.

It is important to note that GTA-based LIUNA 183 suggests that they represent 70,000 members, the majority in the construction industry being construction craft workers. In 2024, despite the increased investment in training centres, only 158 graduated with a CofQ in the entire province.

This extraordinarily low figure demonstrates two fundamental problems. First, there is little to no employer or worker buy-in that the Construction Craft Worker program is producing the skills necessary to make this apprenticeship worthwhile. Second, any attempt to mandate Construction Craft Worker apprenticeship quotas across publicly funded infrastructure projects would create significant labour shortages and would merely entrench an apprenticeship model that is demonstrably failing, despite substantial government investment in training.

For these reasons, the government cannot impose apprenticeship ratios across the entire construction industry when there are clearly insufficient journeypersons available to train apprentices in this trade. Moreover, there is a serious fairness concern in contemplating a mandatory quota system for a trade with an exceptionally broad scope of practice, where only a single union holds the training license.

## Conclusion

PCA supports expanding apprenticeship opportunities. What we do not support is the growing tendency to treat procurement as a catch-all policy lever.

Mandatory apprenticeship requirements on government-funded infrastructure projects are a bad policy choice. They increase costs, restrict competition, complicate delivery, and fail to address the real bottlenecks in the apprenticeship system. Ontario does not have an apprenticeship hiring problem. It has a training capacity problem.

The government should abandon procurement-based apprenticeship mandates and instead focus on enabling employers to do what they are already trying to do: train the next generation of skilled tradespeople for 21<sup>st</sup> century jobs, while delivering critical public infrastructure on time and on budget.

While we commend the government's efforts to date in modernizing the apprenticeship system, this proposal would be a significant step backwards at a critical time. We always welcome additional engagement from the ministry on this and other policy initiatives.

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