



October 30, 2024

The Hon. Marc Miller, P.C., M.P.
Minister of Immigration, Refugees and Citizenship
House of Commons
Ottawa, ON K1A 0A6

RE: The impact on recent changes to the international student program on the residential construction sector in Canada

Dear Minister,

The Canadian Home Builders' Association (CHBA) represents some 8,500 member firms from coast to coast, including home builders, renovators, land developers, trade contractors, product and material manufacturers. Since 1943 we have been the voice of residential construction in Canada, and our members build low-rise, mid-rise, and high-rise homes for both ownership and rental.

Recognizing the pressures that immigration has put on Canada's housing crisis we have provided a series of recommendations regarding how to improve Canada's immigration to ensure we are welcoming new Canadian who both want to purchase homes and can help to build them. Yet CHBA has always supported the Government of Canada's levels planning, and immigration more generally in supporting Canada's workforce challenges and creating vibrant communities across this country.

Having said this, I am writing you today to inform you of the negative impacts recent changes to the International Study Program have had on the residential construction sector in Canada, particularly for our members in smaller communities involved in factory-built housing.

Many of our members have welcome international students as employees because of their language skills, work ethic, interest and enthusiasm, and invested in their recruitment, onboarding, training and retention. However, because of the recent reduction in off-campus work hours students have in many cases been terminated because of unionized minimum hours of work requirements.¹ This, along with the overall reduction study permits issues have affected current workforce supply, along future talent pipeline potential.

¹ Note that outside of Quebec and the GTA is residential construction sector is not unionized. The additional exception in factory-built housing, which actually falls into manufacturing and not residential construction, where many facilities are also unionized.





Furthermore, of concern to our members is the Government of Canada's recent announcement that is taking affected as of November 1, 2024 regarding international students at the college level and eligible programs for Post Graduate Work Permits (PGWP). We would posit that this focus is somewhat misplaced, as many students come into our sector from different fields of study. A more effective approach would be to focus on – or add in additional to a field of study – the profession into which an individual has a job offer as a basis for eligibility for the PGWP. In other words, given the labour crisis in home building, we would recommend that job offers and subsequent full-time employment in home building, including in home-building factories, be included for eligibility.

I will also highlight that the Canadian Home Builders' Association has submitted a proposal - « Creating Robust Immigrant Talent Pipelines for the Residential Construction Sector to Address Canada's Housing Affordability Crisis » - to IRCC that would benefit not only potential immigrants abroad and new Canadians, but also those already in Canada (refugees, asylum seekers, temporary foreign workers and international students).

CHBA would welcome the opportunity to discuss this with you further, and could invite some of our affected members so you can hear firsthand the impact of recent changes. Please contact Leah Nord, CHBA's Senior Director, Operations (leah.nord@chba.ca) to make arrangements.

Sincerely,

Kevin Lee, P.ENG., M.ARCH.
CEO, CHBA

cc: The Hon. Sean Fraser, P.C., M.P., Minister of Housing, Infrastructure and Communities
The Hon. Randy Boissonnault, P.C., M.P., Minister of Employment, Workforce Development and Official Languages

