



October 31, 2024

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

Dear Minister Miller:

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.

I am writing today in response to the Government of Canada's announcement last week regarding Immigration Levels Planning 2025-2027. CHBA and its members have long supported the Government of Canada's immigration levels and programming to help supplement our workforce and build robust communities throughout the country.

Labour shortages in the residential workforce predate the pandemic, and are expected to continue, and even worsen, as an estimated 22% of our workers are expected to retire between now and 2033. In addition, in order to address the Government of Canada's housing targets to address affordability, we need to grow our labour force by 83% above 2023 levels – to just under 1.04 million workers to build 5.8 million homes.

CHBA has called on the federal government to support our industry by addressing the three pillars of: (i) encouraging Canadians to choose a career in residential construction; (ii) supporting increased productivity with increased use of factory-built systems (modular and panelized), and develop an accompanying workforce; and (iii) updating the immigration system to proactively attract much-needed skilled workers in residential construction.

We appreciate that immigration puts pressure on Canada's housing affordability crisis. CHBA has said that we need immigrants who not only dream of owning a home, but also those who dream of building them. It is not only about how many immigrants we bring into the country, but the





'type' of immigrant, their skill sets) and how we set them up for labour market integration and overall success. CHBA did welcome the May 2023 announcement of category-based selection process that includes construction in Express Entry; however, as we have stated many times, there needs to be a greater focus on the labour needs specific to residential construction (not just construction and/or the trades writ large as we have specific and different needs). This involves looking at additional professions categories in the TEERs 3, 4 and 5, for example installers, framers and general labourers/helpers.

CHBA fully appreciates that immigration puts pressure Canada's housing affordability crisis. It is not only about how many immigrants we bring into the country, but the 'type' of immigrant, their skill sets) and how we set them up for labour market integration and overall success. We say that the country needs immigrants who not only dream of owning a home, but also those who dream of building them. CHBA did welcome the May 2023 announcement of category-based selection process that includes construction in Express Entry, however, as we have stated many times, there needs to be a greater focus on the labour needs specific to residential construction (not just construction and/or the trades writ large as we have specific and different needs). This involves looking at additional professions categories in the TEERs 3, 4 and 5, for example installers, framers and general labourers/helpers.

We understand that this represents a significant shift for Canada's immigration eligibility, but it is a critical one if we are to meet Canada's housing supply needs. Residential construction offers a pathway to successful careers for immigrants that is faster and less fraught with hurdles, but we need to target the right entrants with the right competencies, transferrable experience and desire to build a career in the sector. Applicants do not need extensive qualifications in these lower TEERs, but simply need affinity to this kind of work and language proficiency, and from there can grow into valuable skilled workers for the sector. Yet at the same time it raises several new questions, e.g., how to assess competency in non-credentialed professions for entry to Canada, how to provide our members with confidence these new Canadians are qualified, language proficiency for health and safety, how to job match and how to best facilitate labour market integration. To this end, 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).





Canada has a long and successful tradition of welcoming immigrants across the country, and we will need to continue to do so in measured, targeted and strategic ways in order to address our productivity issue and ensure economic prosperity for all.

We would welcome the opportunity to further discuss immigration and the residential construction sector with you, and will be following up to arrange meeting details. You can also contact Leah Nord, CHBA's Senior Director of Operations ([leah.nord@chba.ca](mailto:leah.nord@chba.ca)).

Sincerely,

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

cc: The Hon. Randy Boissonnault, P.C., M.P., Minister of Employment, Workforce Development and Official Languages  
The Hon. Sean Fraser, P.C., M.P., Minister of Minister of Housing, Infrastructure and Communities  
Dr. Harpreet Kochhar, Deputy Minister, Immigration, Refugees and Citizenship Canada

