

December 17, 2021

Marjorie Davison
CEO, Nova Scotia Apprenticeship Agency

Dear Marjorie Davison,

On behalf of the Construction Association of Nova Scotia (CANS), I am writing you today to express our concerns with the proposed amendments to the General Regulations of the Apprenticeship and Trades Qualification Act as they pertain to:

- Restrictions on pre-apprentice program durations, delivery methodology, selection/acceptance criteria, and supervision
- Apprenticeship ratios as a mechanism to safely, efficiently and effectively increase the number of apprenticeship opportunities, completions and consistency

CANS represents more than 800 contractors from across the industrial, commercial, institutional, engineering, and design communities. Our members are suppliers, trade, and general contractors – small, medium, and large contractors that are signatories to a collective agreement and open shop.

There is an unprecedented opportunity to attract, train, and retain the workforce needed now and into the future. To increase the number of people working in the skilled trades, CANS recommends the provincial government loosen entry restrictions, place focus on assuring quality of work, and modernize supervision that reflects modern technology and approaches.

The current apprentice ratio is not conducive to the construction industry growing its workforce as needed and will result in stagnation of the Nova Scotian economy and population. Strict regulation on 1:1 ratio adversely affects small businesses without multiple certified journeymen and limits their ability to grow.

In the attached document you will find supporting research and evidence substantiating a shift to a 1:2 ratio. Also included is our response and recommendations to the amendments proposed by the Nova Scotia Apprenticeship Agency to the General Regulations of the Apprenticeship and Trades Qualification Act.

Given the current and growing workforce development challenges across all employers, we believe that all sectors of the industry, government and academia must collaborate and reach consensus on innovative strategies that will not only meet our workforce challenges, but reduce barriers placed on those pursuing a career in construction.



As the largest employer representative in the province, we not only feel that our concerns and suggested changes to the regulations are timely but are also imperative to the health of our industry and its ability to positively contribute to our economic recovery, growth, ability to benefit our communities and increase the diversity of our workforce.

We are certain that our recommendations will assist your Ministers in achieving your instructions contained in their mandate letters. Specifically, your mention of “modernize our apprenticeship programs” and “build a Nova Scotia with more people, more jobs, better jobs and more housing and infrastructure for people.”

Sincerely,

Duncan Williams
President & CEO
Construction Association of Nova Scotia

CC: Tim Houston, Premier of Nova Scotia
CANS Board of Directors

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Introduction

As the leading voice of Nova Scotia's construction industry, the Construction Association of Nova Scotia (CANS) represents more than 800 small and large companies throughout Atlantic Canada that build, renovate, and restore industrial, commercial and institutional buildings, multi-residential buildings, roads, bridges, and other engineering projects.

CANS equally and fairly represents member companies who are suppliers, trade and general contractors that are signatories to a collective agreement and open shop/non-unionized. Nearly 100 of our members are unionized.

The current journey person to apprentice ratio is not conducive to the construction industry growing its workforce as needed, exacerbating an already unprecedented workforce development challenge, stagnating the Nova Scotian economy, stifling business growth, and artificially limiting employment opportunities. Mathematically, with workers retiring, apprentices leaving the trades, and apprentices not receiving their Certificate of Completion, industry cannot meet immediate and long-term needs.

The assertion that safety is invariably tied to safety experience is simply not supported in data. While safety is a key consideration in structuring apprentice and worker's compensation premiums, there is no data to support that a 1:1 ratio is safer. In fact, Workers Compensation Board data would suggest otherwise. See [Appendix A](#) for details on the average assessment rate in other provinces.

Research and data from the C.D. Howe Institute published *The Effect of Apprenticeship Restrictions in the Skilled Trade* indicates that a 1:1 ratio limits small business growth, especially in a constricted and overworked labor market.¹

CANS recommends the provincial government allow firms to hire more apprentices. Loosening restrictions on entry does not mean eliminating regulations. Instead, CANS recommends shifting the focus of regulation to the quality of work and increased enforcement of unsafe working conditions.

CANS recommends a change to a 1:2 journey person to apprentice ratio.

¹ Robbie Brydon and Benjamin Dachis, "Access Denied: The Effect of Apprenticeship Restrictions in the Skilled Trade," *C.D. Howe Institute: Economic Growth and Innovation, Commentary No.380* (2013).

Safety and Compensation Premiums

Experience Rating is used to price workers' compensation insurance premiums, based on various factors including individual injury costs and safety performance.

Despite having a 1:1 journey person to apprentice ratio, Nova Scotia pays the highest average assessment rate in Canada. In 2021, Nova Scotian employers paid on average, \$2.65 per \$100 in assessable payroll.

Other jurisdictions, such as Saskatchewan and Alberta have an average ratio of 1:2. In 2021, Saskatchewan employers paid on average \$1.17 per \$100 in assessable payroll, and Alberta employers paid on average \$1.14 in assessable payroll. Details on the average assessment rate in other provinces can be found in **Appendix A**. Details on average assessment rate by trade in other provinces can be found in **Appendix B**.

The average assessment rate has failed to show a substantial correlation with the Nova Scotia time-loss workplace injury rate, which has continued to significantly decline over the last decade. Therefore, despite the low ratio and high average assessment rate, it cannot be demonstrated that safety is negatively impacted by the apprenticeship ratio. In fact, sector payroll has increased dramatically over the past decade while time-loss injury rate has fallen 3% between 2015-2018.²

Labour Market

Brydon and Dachis' report titled *Access Denied: The Effect of Apprenticeship Restrictions in the Skilled Trade*, found that provinces which have the strictest regulations on the rate at which firms in specific trades may hire apprentices relative to the number of certified workers substantially reduces the number of people working in a trade by 44%, compared to provinces that have no restrictions.³ Additionally, in provinces that require a firm to have more than one journey person for every apprentice it hires, there are relatively fewer young workers in the trades.

Brydon and Dachis found that incomes of workers in trades with low ratios tend to be 6% lower than those of workers in trades without restrictions. Most strikingly, incomes in trades with high primary ratios are 10% higher than incomes in trades without legislated ratios.

The C.D. Howe report found trades with a higher ratio have a larger share of workers in the trade with an apprentice certification. These results are consistent with the possibility that workers will seek additional formal training when they are more certain that fewer or no competitors without

² Sean Tucker and Anya Keefe, "2020 Report on Work Fatality and Injury Rates in Canada," *University of Regina*, https://www.uregina.ca/business/faculty-staff/faculty/file_download/2020-Report-on-Workplace-Fatalities-and-Injuries.pdf (accessed December 15, 2021).

³ Brydon and Dachis, *Access Denied: The Effect of Apprenticeship Restrictions in the Skilled Trade*, pg. 2.

formal training will subsequently enter the market. That is, a structured and predictable entry pattern contributes to higher completion rates and retention in the sector.

The C.D. Howe Institute is confident that provincial regulation is a determinant of labour market outcomes.

Strict regulation on 1:1 ratio adversely affects small businesses without multiple certified journeypersons and limits their ability to grow. If a small firm required additional apprentices, it would first have to hire more journeypersons, increasing the effective cost of labour.

The ability to hire at a 1:2 ratio or greater provides employers with an opportunity to ensure fit with organizational culture and ensures competency in skill set. An increased ratio will grow productivity, allow for better succession and growth planning, increase training provided, enhance safety, and effectively scale costs to respond to market forces.

CANS recognizes increasing the ratio of journeyperson to apprentice from 1:1 to 1:2 will increase the number of journeypersons certified in Nova Scotia in a time span of three years, with exponential growth over the next ten years. By increasing the ratio of apprentices to journeyperson (i.e., one journeyperson to a minimum of two apprentices), individuals are more inclined to begin a career in the trades if they know there will be a journeyperson to supervise in a trade of their choosing.

CANS recommends the provincial government allow firms to hire more apprentices by increasing the ratio to 1:2, eliminating outdated and draconian restrictions on entry does not mean eliminating regulations.

Training and Completion – We are in last place in the race for talent!

Nova Scotia's average completion rate ranks last in across Canada, aggregated from the top 10 Red Seal Trades (2014-2017). Only 45% of apprentices successfully complete their apprenticeship program and received a Certificate of Completion.⁴ Details on the average completion rate can be found in **Appendix C**.

In Nova Scotia, the examination pass rate in Red Seal Trades for apprentices fell 6%, from 74% pass rate in 2019-2020 to 68% in 2020-2021. The examination rate for trade qualifiers dropped 3%, from 61% in 2019-2020 to 58% in 2020-2021. Details on examination pass rates from 2016-onwards can be found in **Appendix D**.

CANS acknowledges that there are literacy, mathematics and science components in training that may prevent apprentices from excelling and successfully progressing in trades education. There is

⁴ Canadian Apprenticeship Forum, *Apprenticeship Demand LMI National 2019 Report*, <https://caf-fca.org/wp-content/uploads/2019/05/2019-National-LMI-Report.pdf> (accessed December 16, 2021).

a lack of assessment of these essential skills prior to apprenticeship training. Further, we recognize that there is learning challenges and other demographic barriers that may lead to very seasoned and skilled people not completing blocks, exams, etc. Attention and further support is needed to ensure strong retention in our sector and continued attachment to our industry. This is incumbent on industry and the apprenticeship agency.

CANS recommends the Nova Scotia Apprenticeship Agency (NSAA) look at further support to ensure those individuals complete training blocks.

The existing block training model is incompatible with the 1:1 ratio. CANS recommends that training be completed in smaller portions of time, so that employers can finish jobs in a timely manner with their current apprentice. This will incentivize employers to allow their workers to complete additional education and training. Combined with an increase in ratio to 1:2, employers will be able to backfill while apprentices are completing required block training. CANS recommends the staggering of scheduled training for different years of apprenticeship.

Alternative delivery methods must be provided to address socioeconomic challenges, lack of transportation, childcare and more to address the needs of individuals, particularly from underrepresented communities. CANS suggest these alternative delivery methods, such as distance and mobile learning be explored as part of a broader reform of the apprenticeship experience.

Employers have embraced training as one of the greatest opportunities to invest in talent. Private sector, like CANS, has been evolving to meet this demand for over 15 years. The apprenticeship system has not kept pace with these needs.

Concerns about safety

Increasing the apprenticeship ratio does not correlate with a decline of safety at the workplace. Rather, studies demonstrate that exhaustion leads to poor safety outcomes. Injury rates peak among workers who regularly get less than five hours of sleep a night (7.89 injuries per 100 employees) and among workers who typically work more than 60 hours a week (4.34 injuries per 100 employees).⁵

The current 1:1 ratio puts workers in unsafe situations. Because Nova Scotia faces a continued labour shortage, skilled journeypersons who are in limited supply and high demand work longer hours to meet to help their employer meet contractual obligations and workload demand. The current 1:1 ratio increases workload and can lead to overexertion by the supervising journeyperson, poor performance and low productivity. Increasing the ratio to 1:2 will assist the journeyperson complete work assignments in a timely manner with less exhaustion. They will also

⁵ D.A. Lombardi, et al., "Daily sleep, weekly working hours, and risk of work-related injury: US National Health Interview Survey (2004-2008)," *Chronobiology International*, 27(5), (201): 1013-1030.

be better positioned to provide better quality training experiences to their apprentices with an increased attention to safety.

Research shows fatigue makes it harder to concentrate on tasks and impairs a worker's judgment and decision making. This can lead to a worker making careless and often costly mistakes. In addition to decreased productivity and increased risks for accidents and injuries, workers suffering from fatigue are often irritable and lack the motivation to properly perform their job duties. An exhausted journey person negatively impacts the training experience for the apprentice. Exhaustion delays deadlines and puts the ability of companies to compete fairly at risk. Research shows an increase in normal hours worked increases injury risk, regardless of the number of normal hours of sleep.⁶

Safe working procedures and conditions, incident/injury prevention, and the preservation of health are of primary importance in apprenticeship programs in Nova Scotia. These responsibilities are shared and require the joint efforts of government, employers, employees, apprentices and the public. Therefore, it is imperative that all parties are aware of circumstances that may lead to injury or harm.

CANS fully supports safe learning and working environments and emphasizes the importance of safety awareness and education throughout apprenticeship training. CANS also recognizes that safety awareness and education begin on the first day of on-the-job training and thereby is the initial and ongoing responsibility of the employer and the apprentice as required under workplace health and safety training. Therefore, CANS recognizes that safety awareness and training in apprenticeship technical training reinforces, but does not replace, employer safety training required under workplace health and safety legislation.

School based workplace safety programs should be supplemented with other prevention strategies that target workplace training and supervision, or with community-based programs for the most vulnerable groups of young workers. In addition to better timing and more appropriate content of occupational health and safety training, studies recommend improved mentorship, eliminating unsafe work practices, preventative measures including technical solutions, and increased monitoring and injury reporting as preconditions to creating a safe workplace.

As Armstrong (2008) notes however, there are no published studies or statistics that enable policymakers to conclude that additional certification requirements or restrictions on entry necessarily increase worker safety.⁷

CANS acknowledges there is a risk that employers could abuse the system without proper enforcement. CANS also acknowledges under the current system, there is a small percentage of

⁶ Lombardi et al., *Daily sleep, weekly working hours, and risk of work-related injury: US National Health Interview Survey (2004-2008)*.

⁷ Armstrong, T.E., *Compulsory Certification Project*, 2008.

employers who are non-compliant with apprentice ratio regulations to complete jobs. CANS conducted data demonstrates that employers generally want to be compliant and in fact, leaders. Safety, reputation, and good workplace culture contribute to a firm's ability to recruit and retain employees. Our members understand and embrace these expectations.

CANS acknowledges that contractual obligations and limited access to apprentices may artificially create an uneven playing field to the detriment of the majority of companies committed to leading by example – operating with strong ethics and in compliance with well-designed regulations. CANS is relentless and unwavering in those principles and put it into action every day.

Dated and artificially limiting regulations can lead even the best firms to become less compliant as a matter of survival. This must change.

In addition to modern regulatory and training regimes, CANS recommends the establishment of a strong enforcement and compliance system. Ill-informed or bad actors should be governed and given the support they need to be compliant, including increased company training and strong commitment to a safe work environment. Companies who chose non-compliance should be penalised under the full extent of Nova Scotian laws.

CANS recommends the NSAA introduce a stronger enforcement regime to ensure employers and employees understand requirements and are compliant with regulations across the province, including additional tools of enforcement and trained enforcement officers. CANS has repeatedly expressed this concern over the past decade.

Response to proposed amendments

Modernize direct supervision provisions

CANS seeks clarification on what the NSAA deems timely, as increasing the apprentice ratio will have an effect in three years or fewer.

Additionally, the definition of supervision needs to be modernized to include remote, multi-site and multi-trade work. Additional delivery opportunities exist and should be fully explored in collaboration with industry. CANS advocates for the ability of apprentices to be supervised by multiple journeypeople – in-person, remotely and by video for example. These measures will enhance the experience of the apprentice and mentors and allow apprentices a wide breadth of technical skills and exposure in their trade scope. For example, an electrician apprentice could receive training from journeypersons from several sectors to get a more extensive understanding of the scope of work in the electrical trade. For clarity, CANS recommends same trade supervision, not cross-trade supervision.

CANS supports the position that trusted and skilled final year apprentices could be allowed to supervise more inexperienced apprentices in approved skills, all while under the supervision of a fully certified journeyperson. For example, a journeyperson could supervise a third-year

apprentice, who in turn could supervise a first-year apprentice. The third-year gains valuable teaching experience and will increase worksite productivity.

All of which would be under the supervision of a fully certified journeyman. Fourth year exemptions from ratios would also be welcome in addition to a 1:2 ratio. Fourth year exemptions will do little to increase participation of apprentices without the ratio being changed. As such, we would not be supportive of this exemption on its own.

Keep determination of trade ratio by industry through Trade Regulation

CANS disagrees that industry was consulted fully with an expectation that discussions would be ongoing to successfully meet market and labour demands. The transition to agency in 2014 was designed to give industry more authority in decision making, which in turn increased employer involvement in the system.

To better meet its mandate and functions as a training, career path, and enforcement body, CANS recommends moving to an apprentice ratio of 1:2. CANS believes under the current 1:1 ratio, NSAA may be inadvertently limiting apprenticeship opportunities and is artificially straining the market, which is outside and contrary to its core mandate.

Exempt final level apprentices from ratio

CANS accepts this proposed amendment on the stipulation that final year apprentices are exempted from the ratio if universally applied, not by ad hoc application. CANS notes previous references to the exemption of fourth-year apprentices to the ratio on the condition that an increase to 1:2 ratio is undertaken. Like ratio variances, applying for a ratio exemption for a final year apprentice will increase hardship on the employer. The current exemption application process applies unnecessary bureaucracy, adding an additional administrative burden. The ratio variance process would be rendered redundant with a change in the ratio from 1:1 to 1:2 ratio. Companies are also reluctant to apply for variance for proprietary reasons, knowing that such applications are recorded and accessible under the Freedom of Information and Privacy Act.

CANS seeks clarification on what acceptable guidance and supervision by a supervising journeyman will entail. We recommend an extensive discussion on this point and approach.

Clarify that youth working part-time are exempt from ratio

CANS recommends youth apprentices be exempt from the apprenticeship ratios and collective agreements at an employer's discretion. Youth programming is intended to assist youth in making career decisions through exploration and experiential learning. Youth employees are licenced by the Superintendent of Insurance for the Province of Nova Scotia under the Student Insurance Program (SIP). SIP supersedes WCB, meaning that while on

the jobsite, youth workers are insured separately from the employer, with acknowledged limitations (heavy machinery, operation of a vehicle, etc.).

Hundreds of employers embrace and support these initiatives each year. Employers who do not participate in this invaluable experience cite ratios as a barrier or rationale. CANS data affirms that 76% of those who participate in programs, for example, Building Futures for Youth (BFY), go on to participate in industry. Of past participants in the BFY program survey, 70% still work in industry.⁸ Participants that do not choose a career in industry indicate that their experience greatly assisted in choosing the most appropriate career path.

Collective Agreements

CANS recognizes that provincially, regionally and nationally, collective agreements have a wide plurality of apprentice ratios. We further recognize and respect a necessary change in regulation that allows involved parties to make amendments to allow industry to remain competitive and to create a level playing field for all firms. CANS fully respects the freedom of association principles of a collective bargaining unit. CANS fully supports unionized members and the need to have a fair playing field on which to compete.

An increase in the ratio will require changes to collective agreements to ensure employers and union members have fair participation in the marketplace. For clarity, collective agreements exist within proper legal, policy and regulatory frameworks.

For example, Mechanical 5, Boilermaker 73 and Sprinkler 56 acknowledge that the ratio of apprentice to journeypersons for each jobsite shall otherwise be as required under the Apprenticeship and Trades Qualification Act.⁹ Many collective agreements across the country reference the Act as prevailing standards.

However, CANS reaffirms that the existence of collective agreements should not be a deterrent to proactive and necessary changes to regulation. Cited by the C.D. Howe Institute report, strict provincial regulations on the rate at which firms may hire apprentices, and by extension, collective agreements, reduce the number of people who work in a trade.

Expand Ratio Variance to support equity hiring

CANS recommends the ratio of journeyperson to apprentice from 1:1 to 1:2 be applied equally to all apprentices.

⁸ Building Futures for Youth (BFY) Alumni Follow-up 2020, <https://www.cans.ns.ca/wp-content/uploads/2021/12/BFYAlumni-2020.pdf>.

⁹ Nova Scotia Construction Labour Relations Association, "Agreements," 2021. <https://nscra.ca/agreements/> (accessed December 12, 2021).



By doubling the number of apprenticeship opportunities, Nova Scotia is further doubling the opportunity for participation by diverse communities, with above suggested community supports. CANS strongly recommends that the provincial government and NSAA collaborate to bring communities, industry, unions/non-union tradespeople, educators and regulators together to fully understand the needs of all stakeholders in order to build effective solutions as a collective to truly effect necessary change.

CANS supports and recommends the NSAA further their support for apprentices from marginalized communities. Guided by CANS internal research conducted with diverse communities, CANS notes that specific supports are necessary to aid individuals, advance participation, and ensure longevity in the construction industry.

Works Cited

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Appendix

Appendix A: Average Assessment Rate by Province

| Province | 2021 | 2022 |
|----------------------------------|--------|--------|
| Nova Scotia | \$2.65 | \$2.65 |
| British Columbia | \$1.55 | \$1.55 |
| Alberta | \$1.14 | – |
| Saskatchewan | \$1.17 | \$1.23 |
| Manitoba | \$0.95 | \$0.95 |
| Ontario | \$1.37 | \$1.30 |
| Quebec | \$1.77 | \$1.67 |
| New Brunswick | \$2.17 | \$1.69 |
| Prince Edward Island | \$1.57 | \$1.43 |
| Newfoundland and Labrador | \$1.69 | \$1.69 |
| Nunavut | \$2.40 | \$2.40 |
| Northwest Territories | \$2.40 | \$2.40 |
| Yukon | \$2.07 | \$3.29 |

Appendix B: 2022 Assessment Rate by Rate Group (Construction)

| Province | 2022 Assessment rate by Rate Group (Construction) | |
|---|---|--------|
| <u>Nova Scotia</u> | Construction, commercial buildings | \$2.97 |
| | Construction, institutional buildings | \$2.97 |
| | Construction, single + multiple family housing | \$6.03 |
| | Construction, highways, streets, and bridges | \$2.88 |
| <u>British Columbia</u> | Industrial, Commercial, Institutional or Highrise Residential General Contracting or Construction | \$2.00 |
| | House or Other Wood Frame General Contracting, Construction, or Renovation Work | \$3.25 |
| | Road Construction (not elsewhere specified) | \$1.75 |
| <u>Alberta (2021)</u> | Industrial/ Commercial construction | \$1.72 |
| | Residential General Contractor | \$1.37 |
| | Construction Trade Services | \$5.43 |
| <u>Saskatchewan</u> | Construction Trades | \$1.71 |
| | Residential Construction | \$2.62 |
| | Commercial, Industrial Construction | \$1.89 |
| | Road Construction and Earthwork | \$1.85 |
| <u>Manitoba</u> | Building Construction | \$2.06 |
| | Roadwork | \$1.29 |
| | Drywall & Stucco Contracting | \$3.09 |
| | Wrecking & Moving Buildings | \$5.13 |
| <u>Ontario</u> | Residential Building Construction | \$2.63 |
| | Non-residential building Construction | \$1.79 |
| | Infrastructure Construction | \$2.10 |
| | Foundation, Structure & Building Exterior Construction | \$4.11 |
| <u>Quebec</u> | – | |
| <u>New Brunswick</u> | Residential building construction | \$3.14 |
| | Industrial Building and Structure Construction | \$3.14 |
| | Commercial and Institutional Building Construction | \$3.14 |
| | Other Foundation, Structure and Building Exterior Contractors | \$5.07 |
| <u>Prince Edward Island</u> | Road Construction and Repair | \$2.60 |
| | Commercial Construction | \$4.47 |
| | General Construction – Residential | \$4.47 |
| <u>Newfoundland and Labrador</u> | Commercial Building | \$2.61 |
| | Institutional Building | \$2.61 |
| | Industrial Construction – Other | \$1.89 |
| | Highway and Heavy Construction | \$1.89 |
| | Residential Renovation, Single Family Housing, Apartment & Other Multiple Housing | \$2.61 |
| <u>Nunavut and Northwest Territories</u> | Construction, transportation, mining, and forestry machinery and equipment rental and leasing | \$3.28 |
| | Residential building construction | \$4.75 |
| | Commercial, industrial and institutional building construction | \$4.75 |

| | | |
|--------------|--|--------|
| Yukon | Rate group medium (excavation, bridge/road, plumbing, welding, etc.) | \$3.25 |
| | Rate group high (buildings: construction/repair/ demolition) | \$4.92 |

Appendix C: Average Completion Rates, Top 10 Red Seal Trades by Province, 2014-2017

| Province | Average completion rate |
|----------------------------------|-------------------------|
| Total | 52% |
| Nova Scotia | 45% |
| British Columbia | 46% |
| Alberta | 50% |
| Saskatchewan | 63% |
| Manitoba | 49% |
| Ontario | 60% |
| Quebec | 55% |
| New Brunswick | 53% |
| Prince Edward Island | 47% |
| Newfoundland and Labrador | 50% |

Appendix D: Examination Pass Rates in Red Seal Trades (Nova Scotia)
Examination Pass Rates in Red Seal Trades

