



CHBA Submission on IRCC Review of Potential Changes to the Express Entry System

May 2026

Background

Since 1943, the [Canadian Home Builders' Association \(CHBA\)](#) has been the voice of the residential construction industry. Representing one of the largest sectors in Canada, CHBA's membership is made up of some 8,500 companies, who build low-, mid- and high-rise homes for ownership and rental. CHBA is a three-level Association, with a network of 52 provincial and local home builders' associations (HBAs) representing the nuanced needs of the residential construction sector in regions across the country.

Persistent labour shortages in the sector are predicted to continue throughout the decade, with BuildForce Canada estimating that **22% of the residential construction labour force will retire between now and 2033**, with a significant shortfall of workers to replace them. Further, the Canada Mortgage and Housing Corporation (CMHC) predicts that Canada will need to **nearly double housing starts (to up to 480,000 per year) over the next decade to close the housing supply gap and help return affordability to 2019 levels**. To meaningfully pursue those targets, Canada's residential construction workforce would need to **grow a staggering 83%** – to just under **1.04 million workers** in that same timeframe.

Meanwhile, CMHC data shows that in 2024, Canada had “40,349 businesses that employed workers in the residential construction industry. Of these, only 6 businesses had more than 500 employees. The majority (69.5%) were micro businesses with just 1 to 4 employees.” This leaves small businesses with the monumental challenge of trying to nearly double housing starts while facing significant workforce shortages – the residential sector needs **targeted support**.

To meet the overwhelming workforce demands, CHBA has called on the federal government to support the industry by addressing three pillars:

- 1) **Grow the domestic workforce** by working with CHBA (and its partner stakeholders) to redevelop the classification, education, training and recognition system for skilled workers in residential construction to properly reflect the realities of this part of the sector, thereby encouraging and enabling more Canadians to choose and stick with a career in residential construction, including youth, women, newcomers, and other equity-deserving groups.





- 2) **Update the immigration system** to reflect the realities and needs of home building labour to proactively enable the immigration of much-needed skilled workers into residential construction specifically, including factory-built construction.
- 3) **Support increased productivity** by removing barriers to more factory-built systems (see www.chba.ca/SectorTransition) and develop the required factory-built workforce with its evolving needs.

Canada's ability to address its housing supply and affordability challenges is directly tied to the availability of a skilled residential construction workforce. Immigration policy must align with this reality.

CHBA Feedback: Proposed Changes to the Express Entry and Comprehensive Ranking System (CRS)

CHBA appreciates the opportunity to provide input on proposed changes to the Express Entry system and the Comprehensive Ranking System (CRS).

Broadly speaking, the Express Entry and CRS systems remain disproportionately weighted in favour of post-secondary graduates – awarding an unbalanced level of points to graduate-level education risks excluding qualified candidates with practical skills. CHBA also urges the department to consider the impact of bringing in more highly educated, highly skilled workers who already face challenges having their credentials recognized to work in their field in Canada, especially given that [Canada's existing workforce is already amongst the most highly educated in the world](#). A systemic review of the National Occupational Classification (NOC) System versus the actual employment needs of Canada's economy is critical to address these challenges.

CHBA fully appreciates that reducing administrative complexity in the Express Entry system and CRS systems is important for ensuring Canada can attract the skilled workers needed to meet the workforce needs of employers. However, it is essential that the redesigned system better reflects the realities of the residential construction workforce if Canada is to meaningfully address the housing supply and affordability gap.

More specifically, CHBA has concerns about the proposed changes to Express Entry and the CRS in three key areas.





Red Seal Requirement

CHBA is particularly concerned about the proposal to accept only certificates for Red Seal designated trades and introduce new points to recognize trade apprenticeship work. Many qualified and experienced workers operate in skilled trades that are either not Red Seal designated or where certification pathways differ across jurisdictions.

According to [a study published last month by Signal49 Research](#) (formerly the Conference Board of Canada), newcomer construction workers “experience delays entering the industry and career setbacks due to Red Seal and other trade certification processes, often restarting at the entry level or as apprentices.” The same report found that “Canadian experience expectations prevent many immigrants with only foreign construction experience from finding commensurate work in the sector,” illustrating the enormous challenge newcomers face when pursuing skilled trades roles in Canada.

Further, a recent study from the Canadian Apprenticeship Forum (CAF) showed that in 2022, [less than half \(46%\) of men and only one-third \(36%\) of women registered in a Red Seal trade completed their program](#). This illustrates key structural issues with how that system operates. These challenges are only exacerbated for newcomers whose only avenue to pursue Red Seal trades would be on a temporary work permit (note: as part of [new and temporary policy introduced in 2025 that expires in 2027](#), temporary foreign workers can enroll in apprenticeships without needed a separate study permit – it was previously even more difficult temporary workers to access apprenticeship as newcomers needed a work permit *and* a study permit). Still, the length of time needed to complete an apprenticeship in a Red Seal trade is usually 3-5 years, which begs the question of whether it is reasonable to expect that anyone on a temporary work permit would realistically be able to complete a full apprenticeship before having the opportunity to receive an Invitation to Apply (ITA) for permanent residency.

Moreover, the apprenticeship system is not well set up to support the needs of the residential construction sector. For example, the industry is in dire need of framers, which do not require an apprenticeship to perform the job, yet there is no formal training or recognition system for this role. This is one example of many that illustrate the need for a structural rework of the NOC system to properly reflect occupations in residential construction and enable the immigration system to bring in the right workers to build and renovate homes in Canada.

In the absence of changes to the NOC system, **CHBA strongly advises against excluding tradespeople who may have the skills and aptitude for home building but are not Red Seal certified from eligibility**. Tightening the system further will lock out candidates who may be qualified to build housing, leaving Canada no closer to reaching housing targets.





Language Requirements

The proposed minimum language requirement of CLB/NCLC 6 is burdensome and presents a significant barrier for many skilled trades workers. CHBA recommends lowering the requirement to CLB/NCLC 4 for construction jobs, which more accurately reflects the functional language proficiency required for safe and effective work on construction sites.

CHBA supports streamlining language assessments where appropriate and maintaining flexibility in language requirements, provided thresholds are adjusted to reflect sector realities. CHBA therefore recommends that different minimum language thresholds be applied to different occupational categories where appropriate (i.e., bricklayers might need to meet a minimum of CLB/NCLC 4, while doctors might need a minimum a CLB/NCLC 8, for example).

High-Wage Occupation Points

The proposal to award additional CRS points based on “high wage” occupational categories raises similar concerns as prioritizing highly educated workers, as essential residential construction trades may not meet the proposed “high wage” thresholds (e.g., 1.3x, 1.5x or 2x median wage), despite being in critical shortage.

CHBA is concerned that this approach will unintentionally exclude or disadvantage certain skilled trades workers, limiting their ability to receive ITAs. A comprehensive study of the wage thresholds through the lens of skilled trades roles in residential construction is critical to ensure that in-demand roles are not deprioritized due to wage-based classifications and to provide clarity on how many trades occupations would fall within each threshold.

Broader Policy Need: TEERs 4 and 5 Workers

CHBA emphasizes that policy design must not inadvertently restrict access to the very workers needed to build homes. While CHBA supported the 2025 addition of new category-based selection categories in trades roles under Express Entry, [only one draw for Trades occupations – which issued 1,250 ITAs – transpired in 2025](#). With little public data available, it is also unclear how many construction workers (and under which NOCs) came through the Federal Skilled Trades Program (FSTP) as well as the Provincial Nominee Program (PNP) draws in 2025. From what CHBA can tell, almost no one came in via the FSTP. Before making edits to the Express Entry and CRS systems, it is critical that the number of skilled trades entering the country, as well as the barriers that may be preventing newcomers from accessing critical roles in residential construction, are better understood.





Moreover, the residential construction occupations prioritized Express Entry still fall under TEER 0-3. While these occupations are important for the residential talent pipeline, the industry is also in dire need of workers in TEERs 4-5 (e.g., installers, factory-built construction workers, general labourers). Currently, there are few federal pathways that allow TEER 4-5 workers to gain permanent residency in Canada. At present, most candidates in TEERs 4-5 are only able to access pathways to permanent residency by getting provincial nominations through PNPs, which have also been scaled back due to recent federal immigration reductions.

When considering the scale of labour required to meet federal housing targets, as well as the demand for housing-supportive infrastructure through recent federal funding investments (e.g., through the Build Communities Strong Fund), a more balanced approach – one that recognizes the unique characteristics of skilled workers and prioritizes residential labour market demand – is essential.

It will be important to create a permanent, year-round federal stream for residential construction workers in TEERs 4-5 (including for factory-built [modular] construction roles which operate more like manufacturing – a key federal priority) that addresses chronic shortages in residential construction roles.

That's why CHBA is a signatory and staunch supporter of the Employment Insurance Commissioner for Employers' proposal to reimagine immigration through a new Canadian International Workforce Program which divides out streams for truly temporary and chronically (permanently) vacant roles (details attached).

Overall, CHBA encourages IRCC to refine its proposed changes to ensure the Express Entry and CRS system to:

- Reflect the realities of the residential construction workforce, most notably by not limiting to Red Seal-certified and high-wage, highly educated professions; and,
- Reduce barriers for TEER 4-5 newcomers with the skills and aptitude for home building who could reasonably help fill chronic labour market gaps in residential construction.

CHBA welcomes continued engagement with IRCC to ensure immigration pathways effectively support the workers needed to build the homes the country needs to help restore housing affordability for Canadians. For continued consultation, please reach out to **Emily Fielden, Policy and Communications Analyst, CHBA** at emily.fielden@chba.ca.

