



July 5, 2021

[Minister Demetrios Nicolaidis](#)

Advanced Education
Government of Alberta

Re: Skilled Trades and Apprenticeship Education (STAE) Act – Bill 67

Dear Minister Nicolaidis:

On behalf of the Alberta Painting Contractors Association, we understand the need to review the current *Alberta Apprenticeship Industry Training Act*, and applaud your efforts in this regard. We agree that the present *Act* needs to be updated to allow for and encourage change. However, with any change, it is equally important to mitigate unintended consequences and the impact these may have on our workforce and the economy.

While we support the intent of Bill 67 will have a positive impact on the economy, there is a concern this legislation, as proposed, has the potential to undermine apprenticeship in Alberta and create a path to de-regulation of all trades. Therefore, as a stakeholder in the apprenticeship system, we strongly suggest the regulations to the *Act* include:

1. The Board of fifteen, appointed by the Minister, shall include not less than eight different industry representatives from eight different trades.
2. In order to ensure a skilled and ready workforce, apprenticeship training must continue to have the hands-on practical elements taught as part of the in-class sessions.
3. The regulations for each of the existing journeyman programs shall have an industry committee unique to their trade to create and control the content of the journeyman program. In addition, trades must continue to have:
 - a. Influence over the new and existing content of the programs via industry committees.
 - b. A manageable and efficient process to alter and improve programs on a regular basis that includes the participation of instructors/training providers.
 - c. Allowance to prescribe their own period exams in addition to the Red Seal Exams.
 - d. A transparent and efficient protocol that allows for timely population of the advisory committees and allows equal representation of workers and industry employers.
4. In order to maintain high standards for health, safety and quality, micro-credentialing should:
 - a. Only be considered as an add-on to existing journeyman designations and not an alternate path to becoming a journeyman.
 - b. Not be allowed for regulated and or restricted designations within specific trades.

5. For compulsory trades: a. Changes to regulated and restricted designations within a specific trade's scope of work can only be implemented with input from stakeholder consultations and industry committees.
6. Occupations must have a clear path to journeyperson spelled out in the Trade Regulations.
7. New programs should have their own advisory panels that always include industry.
8. No changes to the current apprenticeship sponsorship program, as it currently functions in an effective and efficient manner.

We make these recommendations based on our practical experience with the apprenticeship system, knowing that they will have positive impacts on changes the legislation will deliver. We believe it is critical these changes be included in the regulations for the benefit of all industries that rely heavily on apprentices. The continued involvement of trade employers and employees in the design and delivery of apprenticeship programs will maximize the quality and efficiency of the apprentices' education and their transition into Journeypersons.

We look forward to your response at the earliest opportunity and would be happy to engage with you or your department officials, should you deem it beneficial.

Regards,



Dave Schiffrers, President
Alberta Painting Contractors Association

Cc: [Honourable Premier, Jason Kenney, PC](#)
[Members of the Standing Committee on Alberta's Economic Future](#)
[Members of the Jobs and Economy Cabinet Policy Committee](#)