June 28, 2018

The Hon. Amarjeet Sohi, Minister of Infrastructure

The Hon. Jim Carr, Minister of Energy, MP Winnipeg South Centre

Dear Ministers,

I am writing to you regarding Private Members’ Bill C-344 (An Act to Amend the Department of Public Works and Government Services Act – Community Benefit). As a member of the Manitoba Heavy Construction Association and as a company working in the industry, I would like to convey my and my industry’s deep concerns about the Bill and encourage you to accept the offer of the Canadian Construction Association’s support to help the government engage in broad consultation prior to taking any further action on this Bill.

The Canadian construction industry firmly believes in giving back to the communities in which we live, work and invest. With close to 1.4 million Canadians employed in the industry, construction firms and their employees continue to contribute voluntarily to their local and regional communities, from participating in food drives, to sitting on philanthropic Boards to sponsoring sports teams. Our members also take diversity seriously and through our associations, sponsor Women in Construction events, indigenous and youth outreach programs and many other activities to make construction welcoming to all. We are actively engaging with our membership to assist in these initiatives and to tell their stories more broadly.

The CCA and the MHCA’s primary concern with the Bill is that this will lead to an unpredictable, unfair and opaque procurement process. If the Government wants community benefits in its projects, then the industry requests that these be clearly laid out in the tender documents, and each contractor have equal opportunity to price the work required. Alternatively, should these additional benefits fall outside the scope of the document, contractors are in blind competition with each other without knowing how their proposed benefit(s) will impact the overall evaluation. Further, as the federal government is seen as a leader, we are concerned that this currently ill-defined concept might lead all levels of government across Canada to extract “community benefits” outside the scope of the project. Finally, the Canadian construction industry is concerned about any legislation that may add further regulatory requirements to access federal infrastructure funding, reducing productivity and increasing uncertainty. As it currently reads, we believe Bill C-344 would do just that.

Please allow me to reiterate that the industry is already a strong supporter of community benefits in our communities; these are the communities that we build, where we raise our children, create jobs and contribute to quality of life.

The CCA, as the national voice of the construction industry, has offered to discuss with you how community benefits can be achieved without legislative or regulatory burden. We urge you to delay this legislation to allow for further consultation including discussion with the CCA.

I thank the Government of Canada for its continuing commitment to infrastructure investment across the country and for recognizing the vital role of the construction industry in building Canada’s future.

Sincerely,

Your Signature

Email addresses:

#### [Amarjeet.Sohi@parl.gc.ca](mailto:Amarjeet.Sohi@parl.gc.ca)

#### [Jim.Carr@parl.gc.ca](mailto:Jim.Carr@parl.gc.ca)

[Terry Duguid](http://www.parl.gc.ca/Parliamentarians/en/members/Terry-Duguid(31119)), MP for Winnipeg South, [Terry.Duguid@parl.gc.ca](mailto:Terry.Duguid@parl.gc.ca)

[Doug Eyolfson](http://www.parl.gc.ca/Parliamentarians/en/members/Doug-Eyolfson(89027)), MP for Charleswood-St. James-Assiniboia-Headingley, [Doug.Eyolfson@parl.gc.ca](mailto:Doug.Eyolfson@parl.gc.ca)

[Kevin Lamoureaux](http://www.ourcommons.ca/Parliamentarians/en/members/Kevin-Lamoureux(30552)), MP for Winnipeg North, [kevin.lamoureux@parl.gc.ca](mailto:kevin.lamoureux@parl.gc.ca)

[Hon. MaryAnn Mihychuk](http://www.ourcommons.ca/Parliamentarians/en/members/MaryAnn-Mihychuk(89037)), MP for Kildonan-St. Paul, [MaryAnn.Mihychuk@parl.gc.ca](mailto:MaryAnn.Mihychuk@parl.gc.ca)

[Robert-Falcon Ouellette](http://www.parl.gc.ca/Parliamentarians/en/members/Robert-Falcon-Ouellette(89466)), MP for Winnipeg Centre, [robert.falcon@parl.gc.ca](mailto:robert.falcon@parl.gc.ca)

[Dan Vandal](http://www.parl.gc.ca/Parliamentarians/en/members/Dan-Vandal(89045)), MP for Saint Boniface-Saint Vital, [Dan.Vandal@parl.gc.ca](mailto:Dan.Vandal@parl.gc.ca)