

Licensing Strategic Plan 2021-2025: Feedback



| Strengthening Licensing initiatives | |
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| Comment (theme) | ESA Response |
| <p>More public awareness of the necessity and importance of licensed contractors performing work and eliminate any opportunity where home owners can perform their own electrical work of any nature and the ability for home owners to takeout electric permits</p> | <p>ESA is taking a proactive approach to target different audiences through public campaigns, stakeholder engagement and social media activities. ESA will continue to reinforce the importance of hiring licensed electrical contractors and the requirement to have electrical work inspected by ESA.</p> |
| <p>By creating a method where LEC's are able to perform low-risk and simple work, such as maintenance or like for like replacement/repair of equipment, or the installation of electrical such as 1-10 or 1-20 outlets without the need for on-site inspection by using a method for each contractor similar to the CSS Program, where by photos/videos taken of the job and a description of the work can be reviewed by the inspector remotely using the online services feature available to every LEC, which would reduce backlog and costs for "small jobs" and increase competitiveness vs. the underground economy.</p> | <p>ESA will move to a risk-based approach for electrical wiring inspections in early 2020. Risk-based Oversight means that ESA will use risk criteria to determine whether the work is high, medium or low risk. Permits will have a risk level assigned to it based on:</p> <ul style="list-style-type: none"> who does the installation work what the installation is where the installation is <p>The information from our risk assessment tool will be used by our highly-skilled inspectors to determine the best approach. For example, for every five notifications considered low-risk it will be recommended that an inspector visit one notification, and for every two medium-risk notifications, the recommendation is the inspector visit one notification. Every high-risk notification will receive a visit.</p> |
| <p>ESA needs to better define the benefits to the LEC for compliance. More clarification is needed on how ESA will recognize Licensed Role Models. The first step should be to clearly demonstrate the benefits of compliance. Licensing initiatives should be strengthened and should be stakeholder focused. ESA should be agile and adaptable.</p> | <p>The Licensing Strategy is a high level document that is meant to be broad in nature. Once a strategy is approved, ESA will work with our stakeholders, including associations, on specific steps to help achieve the strategy. ESA will continue to promote the importance of regulatory compliance with licensing requirements through stakeholder engagement, public campaigns and social media. We welcome suggestions from our stakeholders on how to improve electrical safety and compliance.</p> |

| The most important initiatives or supporting activities for the licensing strategy | |
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| To provide better methods of coordination and communication between the inspectors and the LEC's in order to make inspections more streamlined. To give greater leeway to LEC's, based on merit, who in good faith endeavour to perform code compliant work. | ESA wants our stakeholders to engage with us as easily as possible. To help achieve this, we are working to better understand the 'customer journey'. This will help ESA to better understand and deliver the varied services required by our stakeholder groups. We also recognize the importance of being able to deliver services through the channels that best suit each individual's needs. To provide more options to access ESA, we will speed up our digital transformation. ESA is committed to promoting electrical safety and regulatory compliance. ESA has moved toward risk-based oversight to help ensure that more resources are devoted to higher risk projects. |
| Supporting activities should go beyond the general public, and include ESA's role in maintaining stakeholder confidence. It is equally important to maintain the confidence of LECs. | ESA strives to work with all stakeholders to promote electrical safety, help ensure compliance and provide information on our activities and strategic direction. ESA is committed to continuously improving our relationship with all stakeholders and is open to any communication or suggestion. |

| The proposed licensing strategy's affect on business | |
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| Comment (theme) | ESA Response |
| The current level of regulation of the electrical industry is creating a difficulty with competing with the underground economy. Big home improvement box stores provide ready access to contractors that operate within the underground economy, and a closer consideration must be taken with respect to regulating the sale of electrical products similar to how the TSSA has regulated the sale of any products for gas to be soled to licensed gas technicians. Over-regulation increases operating costs for legitimate LEC's. Contractors operating within the underground economy are unaffected by rules and regulations. They will continue to operate, which results in legitimate LEC's being unable to compete in the current market. The end result is LEC's have to make the choice of either breaking the rules themselves, or close the business. | ESA continues to address the underground economy through compliance, reducing demand and targeting suppliers. ESA will maintain and build public confidence through enforcement against the underground economy and efforts to improve our customer experience and make it easier for contractors to achieve regulatory compliance. |
| Current strategic initiatives will have limited impact on the business, but may have negative impact. | |

| Other comments on the proposed licensing strategy 2021-2025 | |
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| Comment (theme) | ESA Response |
| <p>Regulations for LEC's need to be reduced, and greater emphasis needs to be placed in enforcing the existing rules with respect to contractors operating in the underground economy. One aspect that can achieve this goal is to create a joint task force with other organizations, such as the CRA, and create a method to not only enforce the rules, but to prevent contractors from operating within the underground economy.</p> <p>The link provided to a news article outlines one aspect that the CRA is using to combat the underground economy:</p> <p>https://globalnews.ca/news/6036682/cra-underground-economy-home-depot/</p> <p>The ESA needs to stop making it difficult for LEC's to operate and start leveling the playing field with respect to the underground economy.</p> | <p>ESA is committed to targeting and reducing the underground economy, including working with partners such as the Ontario Ministry of Finance and Canada Revenue Agency. As part of this strategy, ESA has an anonymous reporting tool for unlicensed contractors and publishes convictions as a deterrence. We continue to explore new strategies to address non-compliance and the underground economy.</p> |
| <p>We support non-mandatory training for M.E.s to have continuous non-mandatory training and the Ontario Electrical Code and well as financial and OHS training.</p> | |

| Other comments | |
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| <p>The ECRA Council should be an advisory board to ESA and OEL and ECAO Associations' senior staff should be included as non-voting members. ECAO & OEL represent the majority of compliant electrical contractors and as such should be present at ECRA meetings to provide a broader industry perspective.</p> | <p>ESA has taken the comments from ECAO & OEL seriously and is working with both Associations to discuss and address the points that were raised.</p> |
| <p>Master electrician classification is a money grab. Get rid of it. Unless the electrician's apprenticeship program has been dumbed down significantly {which would have been a mistake} as you are a journeyman electrician with inter-provincial license you are qualified to be to be a contractor if you get a contractors license. As I remember you had to have 80% or better on the final exam to receive an inter-provincial license. By the way I have inter-provincial electricians license and master electrician license so I would know.</p> | <p>The laws and regulations in Ontario differ from federal and other provincial laws in Canada. The Master Electrician designation is designed to test the knowledge of applicable Ontario laws under which master electricians operate.</p> |