

## DOCUMENT RESUME

ED 455 438

CE 082 105

TITLE Alberta Apprenticeship and Industry Training: A Vision for the Future. Phase II Discussion Paper.

INSTITUTION Alberta Learning, Edmonton. Apprenticeship and Industry Training.

PUB DATE 1998-01-00

NOTE 38p.; Produced with Alberta Learning Department of Advanced Education and Career Development.

AVAILABLE FROM Apprenticeship and Industry Training, Alberta Learning, 10th Floor, Commerce Place, 10155-102 Street, Edmonton, Alberta, Canada T5J 4L5. Tel: 780-427-8765. For full text: <http://www.tradesecrets.org/library/vision/vision98/jan98/vision.htm>.

PUB TYPE Reports - Descriptive (141)

EDRS PRICE MF01/PC02 Plus Postage.

DESCRIPTORS Adult Education; \*Apprenticeships; Developed Nations; \*Educational Certificates; Educational Policy; Educational Trends; Foreign Countries; Futures (of Society); \*Industrial Training; Policy Formation; Postsecondary Education; Secondary Education; State Licensing Boards; \*State Regulation; \*Student Certification; Vocational Education; Wages

IDENTIFIERS \*Alberta

## ABSTRACT

This paper presents regulatory change proposals from the Alberta Apprenticeship and Industry Training Board and Department of Advanced Education and Career Development for public discussion and comment. Section 1 outlines proposals relating to regulations: program and process details; the ratio of journeymen to apprentices; and apprentice wages. These proposals include no change to content of program requirements, including entrance requirements; removal of program and process details from regulation; retention by the provincial apprenticeship committees and the Board of the authority to set these requirements; no change to journeyman/apprentice ratios; continuation of adequate supervision as the central factor in determining those ratios; and determination of apprentice's wages by market forces. Section 2 outlines proposals about the designation of trades and occupations: continuation of three categories of designation; the Board's use of new criteria to resume its applications for redesignation of optional trades as compulsory trades; and industry's continued responsibility for training in designated occupations, but no regulation of training. Appendixes include a glossary, apprenticeship and industry training regulatory framework, Alberta-designated trades and occupations, proposals, and comments form. (YLB)

## Alberta Apprenticeship and Industry Training

# A Vision for the Future

### Phase II Discussion Paper

- January 1998 -

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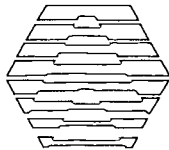
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*Please support the consultation process by providing your comments as soon as possible and no later than April 15, 1998.*

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## **Foreword**

**T**he Alberta Apprenticeship and Industry Training Board (the Board) and the Department of Advanced Education and Career Development (the Department) are continuing to consult with Albertans on apprenticeship and industry training.

The consultation began with a discussion paper called *A Vision for the Future*. It was circulated to Albertans in late 1996. Responses to the discussion paper were collected and reported in March 1997 in the paper called *Keeping You Informed*. The Board and the Department made a number of policy recommendations to the Minister of Advanced Education and Career Development (the Minister). In October 1997 the Minister announced actions based on these recommendations.

In *A Vision for the Future*, the Board asked Albertans about the need to review the apprenticeship and industry training regulatory framework. There was general support (78%) for a review. The Board also asked Albertans about clarifying the criteria for the designation of compulsory certification trades. A significant number (86%) of respondents indicated support for clarification. The Board and the Department have begun this review. Phase II of the consultation is about the Board's proposals relating to regulations and the regulatory framework, and clarification of the criteria for the designation of trades and occupations.

Consulting with Albertans about these proposals is part of the Government of Alberta's regulatory reform project. Regulatory reform is part of the Government of Alberta's ongoing efforts to improve the Alberta Advantage. All Government departments and agencies are reviewing their regulations. The Board and the Department will complete its review of apprenticeship and industry training regulations in 1998.

Your involvement in this consultation is important. The Board and the Department ask you to comment on the proposals in this paper.

## Introduction

Alberta's apprenticeship and industry training system provides skills training for workers. These workers are needed to maintain the Alberta Advantage and are key to Alberta's future economic growth.

In October 1997, the Minister approved a renewed vision and principles for the apprenticeship and industry training system. The renewed vision and principles were developed through the earlier consultation. They provide a base for the proposals in this paper.

### *Vision*

Alberta's apprenticeship and industry training system will continue its leadership role in developing Alberta's highly skilled and trained workforce. The system will be responsive, accessible and affordable to all Albertans, and will be accountable for ensuring high quality industry-oriented training.

### *Principles*

- Albertans who wish to pursue a career in the trades or designated occupations have opportunities to participate in apprenticeship and industry training and work toward acquiring the highest possible standards of knowledge and skills.
- Apprentices and trainees will make a financial contribution to the costs of formal instruction consistent with the benefits they receive.
- Provincial and interprovincial industry standards are the foundation of apprenticeship and industry training in Alberta. Industry, comprised of employers and employees, is responsible for setting training criteria and standards, and for providing on-the-job training and work experience.
- Government, with advice from industry, has a role in regulating apprenticeship training and in helping Albertans to acquire the skills and competencies required to work in the trades and designated occupations.
- Apprenticeship and industry training is based on effective partnerships between and among government, industry, and apprentices and trainees. Training institutions are key participants in the system.

The Minister also approved a number of policy actions. These actions focus on meeting Alberta's future needs for a skilled workforce.

### *New Actions in Apprenticeship*

- *More options for training.* Most apprentices now take the formal training component of their apprenticeship training program in six-to-twelve week blocks of time. Other ways to take the formal training in apprenticeship will be developed. These ways will allow better

coordination between the employer's work requirements and the apprentice's needs. Other ways that an apprentice could take formal training include one day a week instruction, individually-paced learning, distance delivery, or mobile delivery.

- ***Enhanced financial support for apprentices.*** Student loan and grant arrangements were revised in August 1997. Financial help is available for apprentices who need it. The money, most of which is a grant, helps apprentices with their training and living costs when they attend formal training.
- ***More promotion of ways to begin learning a trade and to recognize prior learning.*** There are a number of ways to begin learning a trade. Many of these lead to advanced standing in apprenticeship programs. Greater awareness of these ways will increase interest and participation in apprenticeship training.
- ***More training opportunities for youth.*** The Board and the Department will continue to work with employers to encourage them to participate in apprenticeship training. More apprenticeship training will be made available through programs like the high-school based Registered Apprenticeship Program (RAP) and Careers: The Next Generation. The Board and the Department will continue to support Career and Technology Studies in high school and initiatives like Skills Canada-Alberta.
- ***Increased flexible certification of workers.*** Technologies are changing and business is becoming more specialized. Some employers and employees have said they do not need parts of their apprenticeship training for the specialized work they do. Training and certification of workers in broad craft areas will be pursued at industry's request. This approach allows apprentices to be certified more quickly. It already exists in some Alberta trades. For example, in the Crane and Hoisting Equipment Operator Trade, journeyman certificates are available in the Boom Truck, Mobile Crane, and Tower Crane craft areas.
- ***A strengthened industry advisory committee network<sup>1</sup>.*** The apprenticeship committees are the foundation of Alberta's apprenticeship and industry training system. The Board and the Department will act, where necessary, to achieve more industry involvement. They will encourage better communication among the provincial apprenticeship committees. Local apprenticeship committees will continue, on a voluntary basis, where apprenticeship activity needs this additional committee level.

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<sup>1</sup> See Glossary of Terms for explanation of the industry advisory network

# **The Apprenticeship and Industry Training Regulatory Framework**

The *Apprenticeship and Industry Training Act* (the Act) and 63 regulations<sup>2</sup> are the regulatory framework for apprenticeship and industry training.

Most of the regulations are made by the Alberta Apprenticeship and Industry Training Board and approved by the Minister of Advanced Education and Career Development.

- There are fifty trade regulations. Each contains information about a specific trade.
- There is one general regulation (the *Apprenticeship Program and Certification Regulation*, Alta. Reg. 1/92) that contains information relating to all the trades.
- There are four occupation regulations. Each contains information about a specific designated occupation.

There are also eight regulations, made by the Minister, on specific matters such as appeals and authorizations.

## **What does the legislation regulate?**

- Who can work in some trades. For example, in compulsory trades, a person must have a trade certificate or be a registered apprentice to work<sup>3</sup>.
- Certain aspects of the work. As an example, the ratio of journeymen to apprentices is regulated to ensure suitable supervision and training of apprentices.
- Wages paid to apprentices during the on-the-job training and work experience component of their apprenticeship program.
- Training and certification requirements in each trade and occupation. For example, each of the fifty trade regulations prescribes the minimum education requirements to be an apprentice in a specific trade.

The *Act* came into effect in 1992. The *Act* gave industry more responsibility for training programs and training standards than it had before. The Board and the industry advisory network exercise this responsibility on behalf of industry.

## **The rest of this paper**

The rest of this paper is in two sections. Section 1 outlines proposals relating to the regulations: program and process detail; the ratio of journeymen to apprentices; and apprentice wages. Section 2 outlines proposals about the designation of trades and occupations. The appendices contain more detailed information including a list of the proposals.

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<sup>2</sup> The names of each of the regulations are in Appendix 1. The *Act* and regulations are available to the public from the Queen's Printer Bookstores. They are also available on Internet at <http://www.gov.ab.ca/qp/indiv.html>

<sup>3</sup> Others may work in a compulsory certification trade under certain circumstances. For example, some people have an authorization to work under section 23 of the *Act*, and individuals can work in a compulsory trade on their own property.



# 1. Proposals Relating to Regulations

## Introduction

The *Apprenticeship and Industry Training Act* and regulations:

- Identify the roles and responsibilities of the various partners in apprenticeship and industry training. These partners include industry represented by employers and employees, and government.
- Contain the obligations of employers and apprentices in an apprenticeship program.
  - One example is the ratio of journeymen to apprentices that ensures suitable training and supervision of an apprentice.
  - Another example is the percentage of journeyman wages that an employer must pay to apprentices.
- Prescribe the requirements for apprenticeship and industry training programs. This requirement may relate to all trades and designated occupations, or be specific to a particular trade or designated occupation.
  - Examples related to all trades are information on credit for advanced standing in an apprenticeship program, and the requirements for certification.
  - Examples specific to each trade and designated occupation are entrance requirements, the length of apprenticeship and other training programs, and the number of hours of on-the-job training required for certification.
- Provide information on a number of items, such as how to apply for a trade designation or seek an authorization. They provide information on processes concerning apprenticeship applications and record books, and industry examinations. They provide information on processes involving the industry advisory network.
- Contain schedules that describe the undertakings that constitute the trade and the tasks, activities and functions in each trade.

The Board and the Department have reviewed the apprenticeship and industry training regulations. They have identified the issues for consultation. To guide the review, the Board and Department agreed that:

- The Regulatory Reform criteria<sup>4</sup> are the basis for the review of the regulations.
- General authority (the authority to do something) must be contained in legislation. For example, the authority to establish programs and the authority to set program requirements must be in either the *Act* or in a regulation.
- Details of process and program information can be in policy and official program publications instead of legislation.

The Board and the Department will continue to review the regulations with the input resulting from this paper.

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<sup>4</sup> See Appendix 2 for the Regulatory Reform Criteria

## Proposal 1.1

### Program and process details

The Board and the Department propose that program and process detail be removed from regulation and placed in policy.

#### Questions:

*Do you agree with this proposal?*

*What would you like to see changed or added?*

#### Background

The regulations under the *Apprenticeship and Industry Training Act* contain a number of program and process details. They prescribe the requirements and standards for training and certification and contain information about the administration of the apprenticeship and industry training system. In comparison, other training and education programs are set in policy rather than legislation. For example, the entrance requirements for diploma or certificate programs in the colleges and technical institutions are set in policy and communicated in a number of ways, including institutional calendars.

The apprenticeship and industry training regulations contain:

- Requirements and standards of apprenticeship programs, such as:
  1. Entrance requirements.
  2. Responsibilities of apprentices and employers.
  3. The granting of credit for previous training or experience in a trade or occupation.
  4. The length of an apprenticeship program.
  5. Examinations.
  6. The requirements for certification.
- Requirements and standards of training programs in designated occupations.
- Information about the process for resolving disputes between employers and apprentices.
- Information about the recognition of documents or certificates as equivalent to an Alberta trade or occupational certificate.
- Information about the recognition of training and work experience.

Some of the information describes how to do things. For example, the process for an employer to register an apprentice, the process for applying for a trade designation and processes involving the industry advisory network are described.

Under proposal 1.1, the Minister, the Board and the industry advisory committees would retain their existing authority and continue to make the policy decisions and set the standards and requirements for training and certification in designated trades and occupations. The Board and the Department intend to consider all program and process details and remove from regulation those that could be contained in policy.

No change to the content of program requirements is contemplated as a result of removing program and process details from regulation. The provincial apprenticeship committees and the Board would retain the authority to set these requirements.

## *Proposal 1.2*

### Entrance requirements

The Board and the Department propose that entrance requirements be removed from trade regulations and be set in policy. Entrance requirements would continue to be set by the Board on the recommendation of the provincial apprenticeship committees.

#### Background

Proposal 1.2 is a specific example of the proposal for removing program and process details from the regulations.

#### Questions:

*Do you agree with this proposal?*

*What would you like to see changed or added?*

Entrance requirements are contained in the trade regulations. The Board sets these requirements on the advice of the specific provincial apprenticeship committee. Under proposal 1.2, apprentices would still be required to meet the entrance requirements. However, instead of including entrance requirements in regulation, this information would be included in official publications, such as an apprenticeship and industry training program calendar.

## *Proposal 1.3*

### Journeyman/apprentice ratios

The Board and the Department propose no change to the journeyman/apprentice ratios. They would remain in regulation and the norm would continue to be one journeyman to one apprentice. All journeyman/apprentice ratios currently in regulation, including those that are greater or less than 1:1 would be retained.

#### Background

Journeyman to apprentice ratios that are set out in legislation help ensure that apprentices learn their skills in an environment of appropriate supervision and safety. Supervised on-the-job training and work experience are an important part of apprentices' training. Under the current legislation, employers who train apprentices must employ a certain number of certified journeymen for each apprentice employed.

#### Questions:

*Do you agree with this proposal?*

*What would you like to see changed or added?*

Journeyman/apprentice ratios vary among trades, based on the particular needs of each trade. In most cases, the ratio is one journeyman to one apprentice. To determine the journeyman/apprentice ratio, employers count the number of journeymen actively engaged in the trade and available to provide direction and supervision to the apprentice.

The provincial apprenticeship committee for each trade recommends journeyman/apprentice ratios to the Board. The ratio is approved by the Minister and put into the trade regulation. The ratio can be changed only by amending the regulation. Under proposal 1.3, the norm for journeyman/apprentice ratios would not change but would continue to be one journeyman to one apprentice. The Board could consider a ratio that is different from the norm, if appropriate, both for new trades and for trades already at 1:1. The ratio would continue to be included in each trade regulation. The need for supervised training and safety considerations would continue to be the central factors in determining journeyman/apprentice ratios.

### *Proposal 1.4*

#### **Apprentice wages**

The Board and the Department propose that apprentice wages would be removed from regulation. The Board would encourage the continued recognition that fair wages, including progressive increments to wages as training levels are completed, are a cornerstone of the effective operation of Alberta's apprenticeship and industry training system.

#### **Background**

Minimum apprentice wages are prescribed in each trade regulation as a percentage of the wages the employer pays to journeymen. The percentage increases as the apprentice completes each period of apprenticeship training. The percentages vary among the trades. They are set by the Board on the recommendation of the provincial apprenticeship committees.

The wage percentage applies to all employers within a trade. Since journeyman wages are not prescribed, they may vary from employer to employer. Therefore the actual wages paid to apprentices may also vary.

Some believe the regulation of apprentice wages is inconsistent with private sector competitiveness, ineffective and an intrusion in business operations. They note that wages are a labour matter, not a training matter and that Alberta's *Employment Standards Code* regulates minimum wages. Others believe that having wage percentages in regulation ensures that apprentices receive fair wages for their work.

#### Questions:

*Do you agree with this proposal?*

*What would you like to see changed or added?*

The Board believes that fair, progressive wages are a cornerstone of apprenticeship and industry training. The Board believes that the payment of wages is not a training matter, but a matter that should be regulated by Alberta's labour laws. However, it believes that employers should pay fair wages to apprentices, including progressive increases as each period of training is completed. The Board would set guidelines for apprentice wages that express what the Board considers reasonable.

Some parts of industry feel that apprentice wages may be higher in periods of economic growth than in economic downturns. In growing economies, apprentices may not be affected by the absence of established wage percentages. In periods of economic downturn, employers may be able to maintain existing apprenticeships rather than lay apprentices off. Others believe that having wages in regulations ensures that apprentices are compensated fairly for their work.

## 2. Designation of Trades and Occupations

### Introduction

Alberta has 50 trades. Nineteen trades are compulsory certification trades and 31 are optional certification trades. Alberta also has 4 designated occupations<sup>5</sup>. The Lieutenant Governor in Council (Cabinet and the Lieutenant Governor) designates trades. The Minister designates occupations.

Designation means the Lieutenant Governor in Council or the Minister has approved the establishment of the trade or occupation. When the trade or occupation is recognized in this way, it is subject to the provisions of the *Apprenticeship and Industry Training Act* and regulations. It means that industry sets training and certification standards. A certificate is issued by the provincial government to recognize the achievement of competencies in that trade or designated occupation.

The Board reviews applications for designation and recommends the designation of a trade or occupation to the Minister. An application for designation must contain certain information<sup>6</sup>, such as the support of industry and the implications of designation on employers, workers and the public. This information is used by the Board to assist in its review of an application.

Designated occupations were introduced in 1992 as a separate category of training and certification. The differences and similarities among compulsory certification trades, optional certification trades, and designated occupations are described in the chart on page 11.

In the 1996 public consultation, Albertans encouraged the Board and the Department to clarify the criteria for designating compulsory certification trades. During the review of the proposed criteria, the Board and the Department realized that criteria for designating optional certification trades was also required. The Board and Department also considered whether there is a need to redefine designated occupations to meet the changing needs of industry.

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<sup>5</sup> A list of compulsory certification trades, optional certification trades, and designated occupations is included in Appendix 3.

<sup>6</sup> This information is in *Designation of Trades and Occupations Regulation*.

## Similarities and differences among designated trades and occupations

Compulsory Certification Trades (19)	Optional Certification Trades (31)	Designated Occupations (4)
A person must be a certified journeyman or a registered apprentice <sup>7</sup> to work in the trade.	A person does not have to be a certified journeyman or a registered apprentice to work in the trade. An employer can determine if a person is competent to work in the trade.	A person does not need certification to work in the designated occupation. There are no restrictions on who can work in a designated occupation.
An apprenticeship training program is a combination of formal instruction and documented on-the-job training and work experience. Both are required to complete the program and be granted a certificate.	An apprenticeship training program is a combination of formal instruction and documented on-the-job training and work experience. Both are required to complete the program and be granted a certificate.	An occupational training program may be a combination of formal instruction and documented on-the-job training and work experience or work experience alone.
Industry provides the on-the-job training and work experience. This represents 80% of an apprenticeship training program. It is documented through the use of an official record book.	Industry provides the on-the-job training and work experience. This represents 80% of an apprenticeship training program. It is documented through the use of an official record book.	Industry provides the on-the-job training and work experience. This can represent 100% of an occupational training program. It may be documented through the use of an official record book.
Government funds most of the cost of formal instruction. Formal instruction represents 20% of an apprenticeship training program. Government also provides other support. For example, the development of course outlines and the provision of support to the industry advisory network are funded by government.	Government funds most of the cost of formal instruction. Formal instruction represents 20% of an apprenticeship training program. Government also provides other support. For example, the development of course outlines and the provision of support to the industry advisory network are funded by government.	Industry and trainees bear most of the costs. Government provides secretariat support for the occupational training committees.
Regulations govern the requirements for employers to register apprentices, wages paid to apprentices on the job, and the ratio of journeymen to apprentices on the job.	Regulations govern the requirements for employers to register apprentices, wages paid to apprentices on the job, and the ratio of journeymen to apprentices on the job.	Regulations do not govern the registration of trainees, their wages and the ratio of supervisor to trainees on the job.

<sup>7</sup> Others may work in a compulsory certification trade under certain circumstances. For example, some people have an authorization to work under section 23 of the *Act*.

## *Proposal 2.1*

### Criteria for the designation of all trades

The Board and the Department propose that, when the Board reviews applications for designation as a trade, it consider the extent of industry support for the proposed designation, and the following, as applicable:

1. The range of skills and the depth of technical knowledge required to work in the proposed trade and industry's desire for recognition of, or training for, these skills and knowledge.
2. Whether the proposed trade would provide for a viable career.
3. The degree of overlap with existing trades, or duplication of existing training or certification in any other occupation.
4. Whether the proposed trade would require further authorization from other government departments or agencies.
5. The impact of the proposed designation in Alberta and other provinces and territories.
6. Whether the estimated annual number of new apprentices entering the proposed trade would allow a viable training program.

### Questions:

*Do you agree with this proposal?*

*What would you like to see changed or added?*

### Background

Currently, a regulation describes what information an application for designation under the *Act* should contain. The fall 1996 consultation proposed that the Board work with industry to clarify the criteria for designation as a compulsory certification trade. As the Board considered this criteria, it realized that criteria for designating optional certification trades was also required.

The Board proposes using the criteria in proposal 2.1 as the basis for reviewing applications to become a designated trade. The Board would consider the specific circumstances around each application and exercise its judgment in making recommendations to the Minister.

The Board may recommend that a trade be designated when industry identifies a need for workers to have certain skills and knowledge to work competently. Industry support would continue to be an essential, but not the sole criterion for designation.

The Board proposes using additional criteria (see proposal 2.2) to review applications for designation as a compulsory certification trade.



## Proposal 2.2

### Criteria for the designation of compulsory certification trades

The Board and the Department propose that, when the Board reviews applications for designation as a compulsory certification trade, it considers *all* of the following:

1. The extent of industry support for the proposed compulsory certification designation.
2. The *demonstrated* need for proven competency to perform the work of the trade because of one or more of:
  - [a] Dangerous substances.
  - [b] Dangerous or destructive equipment.
  - [c] Dangerous techniques or practices used in performing the work of the proposed trade.
3. The *scope and degree* to which the materials and methodology of the proposed trade, if improperly applied, may harm members of the public, or workers, or may have the resulting product or activity put the public at risk.

### Background

Certification in a compulsory certification trade is effectively a licence to work. Some consider it a restriction on individuals' access to employment opportunities and a control on the supply of skilled labour. Others note that the system particularly supports small employers, by ensuring that all employers must use trained workers, thus promoting a level and competitive environment. Compulsory certification trades include electrician, plumber, gasfitter, crane and hoisting equipment operator, automotive service technician and others<sup>8</sup>.

Public safety, combined with the strength of industry's interest in having compulsory certification designation, has been an important guiding criterion for the review of applications for compulsory designation. The Board and Department investigated the feasibility of implementing a risk assessment approach as the basis for designating trades as compulsory certification trades. They found that it would be extremely complex to catalogue the numerous hazards that might occur in the different trades, determine the probability of those hazards occurring, and objectively assess the severity of the potential harm done to an individual or to the public in general.

While the full implementation of a risk assessment approach may not be possible, members of the public likely expect some evaluation to be made of the risk associated with the work of certain trades. They likely expect that training will be required for working in those trades.

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<sup>8</sup> See Appendix 3 for a complete list of designated trades and occupations.

### Questions:

*Do you agree with this proposal?*

*What would you like to see changed or added?*

The Board and the Department propose that the Board use the above criteria in making recommendations that a proposed trade or an existing trade be designated as requiring compulsory certification. The Board would consider the extent of industry support for the trade to be a compulsory certification trade. A proposed or an existing trade would be designated as a compulsory certification trade where it is necessary to allow only those with proven competency in the trade to work. No trade would be designated as requiring compulsory certification or change designation without public consultation.

### *Proposal 2.3*

#### *Restricted activities*

The Board and the Department propose that provincial apprenticeship committees consider identifying restricted and non-restricted activities in their trades.

#### **Background**

Within the compulsory certification trades, there is a need to identify work activities that could be restricted to individuals who are qualified in a particular trade, and those activities that could be unrestricted. At present, trade regulations have schedules that identify the undertakings that constitute a trade and the tasks, activities and functions that come within a trade and can be performed only by an individual qualified to work in that trade.

The Board would encourage provincial apprenticeship committees to consider identifying restricted and non-restricted activities in their trades. This means that a provincial committee might identify activities that only a certified journeyman or an apprentice could do. It would then identify activities that are of a general nature and other workers could do.

#### Questions:

*Do you agree with this proposal?*

*What would you like to see changed or added?*

**COMMENTS FORM****A Vision for the Future  
Phase II Discussion Paper****INSTRUCTIONS**

To assist us in our analysis of the responses, please complete the section below that applies to you.

**Section I - Individuals**

If you are responding as an *individual*, please circle the **ONE** number below that best describes you.

1. Employer of tradespeople in the public or private sector.
2. Employee in the skilled trades in the public or private sector.
3. Post secondary educator/instructor.
4. K-12 educator/instructor.
5. Student (other than apprentice or trainee).
6. Other (please specify) \_\_\_\_\_

Are you certified or working toward certification in a trade or designated occupation? If yes, please circle any that apply.

- I. Journeyman.
- II. Apprentice.
- III. Trainee in a designated occupation (warehousing, plasterer, gas utility operator, construction craft labourer)

**Section II - Organizations**

If you are responding *on behalf of the members* of an association or institution, please circle **ONE** of the letters A. to G. below.

- A. Employer association.
- E. Employee association.
- B. Post-secondary institution.
- F. Private training provider.
- C. K-12 provider such as school, district or board.
- D. Government department, board, agency or commission.
- G. Other association (please specify) \_\_\_\_\_

How many members in Alberta does your association represent? (Please specify) \_\_\_\_\_

Is your association involved with the Alberta apprenticeship and industry training system? (Please circle)

- i. Directly involved.
- ii. Indirectly involved.
- iii. Neither directly nor indirectly involved.

## APPENDIX 5

### *Proposal 1.1 Program and process details*

(for Background, see page 6)

The Board and the Department propose that program and process detail be removed from regulation and placed in policy.

1. Do you agree with this proposal? (Please circle) YES NO
2. What would you change or add?

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### *Proposal 1.2 Entrance requirements* (for Background, see page 7)

The Board and the Department propose that entrance requirements be removed from trade regulations and be set in policy. Entrance requirements would continue to be set by the Board on the recommendation of provincial apprenticeship committees.

1. Do you agree with this proposal? (Please circle) YES NO
2. What would you change or add?

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### *Proposal 1.3 Journeymen/apprentice ratios* (for Background, see page 7)

The Board and the Department propose no change to the journeyman/apprentice ratios. They would remain in regulation and the norm would continue to be one journeyman to one apprentice. All journeyman/apprentice ratios currently in regulation, even those that are greater or less than 1:1, would be retained.

1. Do you agree with this proposal? (Please circle) YES NO
2. What would you change or add?

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**Proposal 1.4 Apprentices wages** (for Background, see page 8)

The Board and the Department propose that apprentice wages would be removed from regulation. The Board would encourage the continued recognition that fair wages, including progressive increments to wages as training levels are completed, are a cornerstone of the effective operation of Alberta's apprenticeship and industry training system.

1. Do you agree with this proposal? (Please circle) YES NO
2. What would you change or add?

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**Proposal 2.1 Criteria for the designation of all trades** (for Background, see page 12)

The Board and the Department propose that, when the Board reviews applications for designation as a trade, it consider the extent of industry support for the proposed designation, and the following, as applicable:

1. The range of skills and the depth of technical knowledge required to work in the proposed trade and industry's desire for recognition of, or training for, these skills and knowledge.

Do you agree with this criteria? (Please circle) YES NO

What would you change or add?

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2. Whether the proposed trade would provide for a viable career.

Do you agree with this criteria? (Please circle) YES NO

What would you change or add?

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3. The degree of overlap with existing trades, or duplication of existing training or certification in any other occupation.

Do you agree with this criteria? (Please circle) YES NO

What would you change or add?

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## APPENDIX 5

4. Whether the proposed trade would require further authorization from other government departments or agencies.

Do you agree with this criteria? (Please circle)

YES

NO

What would you change or add?

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5. The impact of the proposed designation in Alberta and other provinces and territories.

Do you agree with this criteria? (Please circle)

YES

NO

What would you change or add?

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6. Whether the estimated annual number of new apprentices entering the proposed trade would allow a viable training program.

Do you agree with this criteria? (Please circle)

YES

NO

What would you change or add?

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**Proposal 2.2**    *Criteria for the designation of compulsory certification trades*    (for Background, see page 13)

The Board and the Department propose that, when the Board reviews applications for designation as a compulsory certification trade, it consider *all* of the following:

1. The extent of industry support for the proposed compulsory certification designation.
2. The *demonstrated* need for proven competency to perform the work of the trade because of one or more of:
  - (a) Dangerous substances.
  - (b) Dangerous or destructive equipment.
  - (c) Dangerous techniques or practices used in performing the work of the proposed trade.
3. The *scope and degree* to which the materials and methodology of the proposed trade, if improperly applied, may harm members of the public, or workers, or may have the resulting product or activity put the public at risk.

1. Do you agree with **all** of the criteria in this proposal? (Please circle)

YES

NO

2. What would you change or add?

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THANK YOU FOR YOUR FEEDBACK. PLEASE RESPOND NO LATER THAN APRIL 15, 1998.

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**Proposal 2.3 Restricted Activities** (for Background, see page 14)

The Board and the Department propose that provincial apprenticeship committees consider identifying restricted and non-restricted activities in their trades.

- 1. Do you agree with this proposal? (Please circle) YES NO
- 2. What would you change or add?

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**Proposal 2.4 Designated Occupations** (for Background, see page 15)

The Board and the Department propose that the Board set standards and award credentials for the achievement of competencies in designated occupations and that the name "designated occupation" be changed.

- 1. Do you agree with this proposal? (Please circle) YES NO
- 2. What would you change or add?
- 3. What would you call "designated occupations?"

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1. Please let us know who you are so that we can keep in touch with you. This information will be kept separate from your comments and will not be used in the analysis of your comments.

Name: \_\_\_\_\_

Organization: (if responding on behalf of an organization) \_\_\_\_\_

Mailing Address: \_\_\_\_\_

\_\_\_\_\_

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\_\_\_\_\_

e-mail address \_\_\_\_\_

2. Space is provided on the comments form for your comments. Please make copies if you need additional space, or attach additional pages if you want to provide more detailed comments.

3. Mail completed forms to:

*A Vision for the Future*

**c/o Alberta Apprenticeship and Industry Training Board**

**10<sup>th</sup> floor, Commerce Place**

**10155 - 102 Street**

**Edmonton, Alberta, T5K 1C5**

or: fax forms to (403) 422 - 1286

4. Please support the process by sending in your comments as soon as possible and no later than **April 15, 1998.**

Personal information is collected under the authority of the *Government Organization Act.*



## Proposal 2.4

## Designated occupations

The Board and the Department propose that the Board set standards and award credentials for the achievement of competencies in designated occupations and that the name “designated occupation” be changed.

### Questions:

*Do you agree with this proposal?*

*What would you like to see changed or added?*

*What would you call “designated occupations”?*

### **Background**

The implementation of designated occupations has created some challenges for industry and government. Currently, designated occupations are similar to designated trades in many respects. This includes the industry committee process and the regulating of matters such as length of training programs and amount of required on-the-job training. There are differences in the requirements for training and certification and in terms of funding. Training and certification for designated occupations is totally voluntary and funding is, for the most part, industry’s responsibility.

The Board and the Department would like to see a more flexible and less regulated process than currently exists in designated occupations. For example, the process of skill development need not be regulated. Training could take place in an open learning system where trainees are treated as any other adult learner. Demonstration of competence could be the determining factor for certification. The Board and the Department believe that designated occupations provide a viable option for recognizing competencies acquired through forms of training that may be less prescribed than apprenticeship training and not necessarily publicly funded. These could include learning through experience, learning on the job, and learning through a variety of courses and programs.

In some cases, industry has already agreed on training and standards before applying for designation. What they are looking for is recognition of competencies, provincially and possibly nationally. This could be something similar to the Board’s recent implementation of the Achievement in Business Competencies program. Under this program, core competencies have been identified. They can be obtained in a number of ways such as combining work experience and various courses and programs that are available through a variety of public and private trainers. Recognition is granted after successful completion of an industry examination that tests the core competencies.

Designation as an occupation could continue to provide industry with recognition of the achievement of standards of competency. It could provide provincial certification that is highly recognized and provide credibility for the occupation. A clear distinction between designated trades and occupations and less regulation might provide more opportunities for workers to have their competencies recognized and credentialed.

The name “designated occupations” has created confusion with occupations governed by other legislation. The Board and the Department propose that a different name be chosen.

## Summary

Section 1 outlines the Board and the Department's proposals relating to regulations: program and process details; the ratio of journeymen to apprentices; and apprentice wages.

No change to the content of program requirements, including entrance requirements, is contemplated as a result of removing program and process details from regulation. The provincial apprenticeship committees and the Board would retain the authority to set these requirements.

There would be no change to journeyman/apprentice ratios. The need for adequate supervision would continue to be the central factor in determining journeyman/apprentice ratios.

In the future, market forces would determine apprentice's wages.

Apprentice's wages would continue to be governed by Alberta's *Employment Standards Code*. The Board would strongly encourage employers to ensure that their wage practices are appropriate, and that employers continue the practices of providing progressive wage increments to apprentices as levels of training are completed. The Board may develop guidelines based on recommendations from the applicable provincial apprenticeship committee for apprentice wages that express what it considers reasonable.

Section 2 outlines the Board and the Department's proposals about the designation of trades and occupations. Alberta's apprenticeship and industry training system would continue to have three categories of designation. These would be designated trades with optional certification, designated trades with compulsory certification and designated occupations with a new name. There would be clear criteria for the designation of compulsory certification trades.

The Board has received several applications for the redesignation of optional trades as compulsory trades. Under the proposal, the Board would use the new criteria (see Proposal 2.2 on page 13) to resume its review of the applications.

Some existing designated trades and occupations might, over time, be redesignated. However, redesignation or designation of a trade would occur *only* after a public consultation. As a result, the proposals in section 2 would have no *immediate* effect on existing designated trades or occupations.

In designated occupations, industry would continue to be responsible for training but training would not be regulated. Training would occur in an open learning system where trainees are treated as any other adult learner in Alberta. In some instances, the training may already exist in various packages or formats from different training providers. Individuals who demonstrate the required competencies would be certified. Government would fund some of the cost of assessing competencies and issuing certificates.

## ***Conclusion***

In October 1997, the Minister of Advanced Education and Career Development announced several policy changes for apprenticeship and industry training. These policy changes will enhance the training system's ability to respond quickly to employer and worker needs. The Board and the Department are now seeking the public's input on regulatory issues.

This paper contains the Board and the Department's proposals relating to regulatory change. The proposals are consistent with the requirements of the Regulatory Reform Task Force.

During the 1996 consultation, industry's needs for a more responsive and flexible training system was identified as a priority. The Board and the Department believe that the proposals described in this paper may increase the responsiveness of the apprenticeship and industry training system and make the system more flexible.

## ***Next steps***

**T**he Board and the Department welcome your comments on the proposals in this paper. We invite you to respond by using the comments form in appendix 5. Please feel free to make additional copies of the form.

After you have completed the form, please **mail** it to:

A Vision for the Future  
c/o Alberta Apprenticeship and Industry Training Board  
10<sup>th</sup> floor, Commerce Place  
10155 - 102 Street  
Edmonton, Alberta, T5K 1C5

or **fax** it to:

(403) 422-1286

or complete the comments form over the Internet.

The address for the discussion paper and comments form is:  
**<http://www.tradesecrets.org/whatsnew>**

For additional copies of the paper, please contact the Apprenticeship and Industry Training office at the Alberta Career Development Centre or Canada Alberta Service Centre near you or telephone 403-427-5790.

*Please support the consultation process by providing your comments as soon as possible and no later than **April 15, 1998.***

## **Bibliography**

- *A Vision for the Future* Alberta Apprenticeship and Industry Training, a discussion paper, October 1996.
- *Keeping you informed.....A Vision for the Future....* responses to a discussion paper, March 1997.

## **Glossary of Terms**

An **Apprentice** is an individual who has chosen a trade; been hired by an employer willing to train him/her in the trade; and is registered with the Department of Advanced Education and Career Development as an apprentice.

A **Designated Occupation** is an occupation with identified job skills and competencies that has been designated by the Minister of Advanced Education and Career Development on the recommendation of a specific industry, and the Alberta Apprenticeship and Industry Training Board.

**Industry** is both employers and employees.

The **industry advisory network** is:

- Local apprenticeship committees (LACs).
- Provincial apprenticeship committees (PACs).
- Occupational training committees (OTCs).

LACs work in the community. They keep a “finger on the pulse” of local activity in their trade. LACs provide this local input to the PAC for their trade and alert their PAC to local issues.

There is a PAC for each trade and they have many responsibilities. Their most important one is to develop training standards, course outlines and examinations. Course outlines are used by the training institutions to provide the formal training in each trade. The industry examinations make sure that apprentices meet the standards that industry has set.

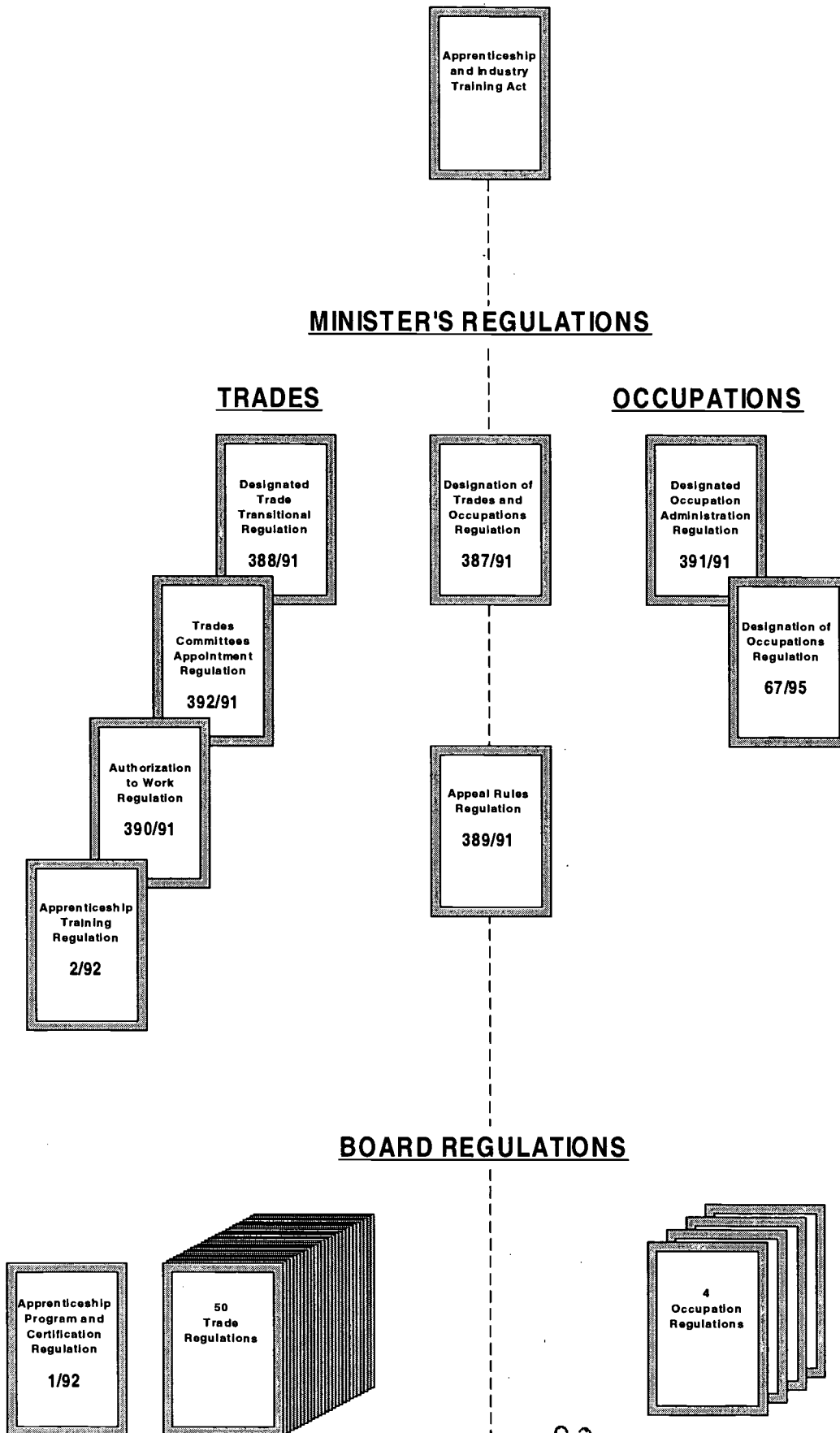
PACs make recommendations to the Board about training and certification. They also keep in touch with the LACs and their activities.

Designated occupations have occupational training committees. Their responsibilities are the same as both local and provincial apprenticeship committees.

Each committee has an equal number of employer and employee representatives. The Alberta Apprenticeship and Industry Training Board appoints members to the committees. Administrative and technical support are provided by Advanced Education and Career Development.

A **Trade** is an occupation with identified job skills and competencies that has been designated by the Lieutenant Governor in Council on the recommendation of a specific industry, the Alberta Apprenticeship and Industry Training Board and the Minister of Advanced Education and Career Development. A trade may be either a compulsory certification trade or an optional certification trade. A trade has a training program called an apprenticeship training program.

# APPRENTICESHIP AND INDUSTRY TRAINING REGULATORY FRAMEWORK



## APPRENTICESHIP AND INDUSTRY TRAINING ACT REGULATIONS

### Regulations made by the Minister

Apprenticeship Training Regulation	Alta. Reg. 2/92	Includes process relating to the administration of apprenticeship training programs.
Authorization to Work Regulation	Alta. Reg. 390/91	Describes the application process for an authorization under section 23 of the Act. Describes what the Executive Director must think about when reviewing an application for an authorization.
Trades Committees Appointment Regulation	Alta. Reg. 392/91	Includes additional criteria to what is in the Act for the appointment of members to provincial and local apprenticeship committees. Also provides for the appointment of provisional committees prior to the designation of a trade, stipulates the composition of provisional committees and provides for remuneration of committee members.
Designation of Trades and Occupations Regulation	Alta. Reg. 387/91	Describes the process for establishing designated trades or occupations. It describes the consultation the Board must conduct when reviewing an application for designation. Requires provisional committees to make recommendations to the Board when a designation application is under review.
Appeal Rules Regulation	Alta. Reg. 389/91	Sets out the rules to apply to appeals under Part 4 of the Act. They are intended to ensure that appeal hearings are conducted in accordance with the rules of natural justice and the principle of fairness.
Designated Trade Transitional Regulation	Alta. Reg. 388/91	Outlined the process and requirements for certification during the transitional period after the repeal of the <i>Manpower Development Act</i> .
Designation of Occupations Regulation	Alta. Reg. 67/95	Establishes designated occupations. <ul style="list-style-type: none"> <li>• Gas Utility Operator, effective March 31, 1995</li> <li>• Plasterer, effective April 1, 1995</li> <li>• Warehousing, effective August 1, 1996 (Alta. Reg. 104/96)</li> <li>• Construction Craft Labourer, effective January 1, 1997 (Alta. Reg. 236/96)</li> </ul>
Designated Occupation Administration Regulation	Alta. Reg. 391/91	Authorizes the Board to establish occupational committees and prescribes their composition, function, etc. Also authorizes the Minister to charge fees.

## APPENDIX 1

### Regulations made by the Board, approved by the Minister

Apprenticeship Program and Certification Regulation	Alta. Reg. 1/92	Describes the process and requirements that apply to the apprenticeship programs in all trades. Defines what certificates are equivalent to trade certificates issued under the Act and the process for determining whether other non-recognized certificates are equivalent. Also outlines the requirements for obtaining a trade certificate without completing an Alberta apprenticeship program.
<b>Trade Regulations</b>		
Agricultural Mechanic Trade Regulation	Alta. Reg. 18/95	<p>Each trade regulation:</p> <ul style="list-style-type: none"> <li>• Describes the trade.</li> <li>• Describes the educational requirements to enter into an apprenticeship program in the trade.</li> <li>• Describes the length of the apprenticeship program, including the number of periods and the number of hours of on-the-job training required in each period of apprenticeship.</li> <li>• Prescribes the ratio of journeymen to apprentices that an employer may employ.</li> <li>• Prescribes the minimum wages, in terms of a percentage of journeymen's wages that must be paid to an apprentice.</li> </ul>
Appliance Service Technician Trade Regulation	Alta. Reg. 143/94	
Auto Body Technician Trade Regulation	Alta. Reg. 120/94	
Automotive Service Technician Trade Regulation	Alta. Reg. 121/94	
Baker Trade Regulation	Alta. Reg. 122/94	
Boilermaker Trade Regulation	Alta. Reg. 199/94	
Bricklayer Trade Regulation	Alta. Reg. 123/94	
Cabinetmaker Trade Regulation	Alta. Reg. 124/94	
Carpenter Trade Regulation	Alta. Reg. 16/96	
Concrete Finisher Trade Regulation	Alta. Reg. 285/93	
Communication Electrician Trade Regulation	Alta. Reg. 125/94	
Cook Trade Regulation	Alta. Reg. 170/94	
Crane and Hoisting Equipment Operator Trade Regulation	Alta. Reg. 54/97	
Electrical Rewind Mechanic Trade Regulation	Alta. Reg. 126/94	
Electrician Trade Regulation	Alta. Reg. 98/95	
Electronic Technician Trade Regulation	Alta. Reg. 127/94	
Elevator Constructor Trade Regulation	Alta. Reg. 331/93	
Floorcovering Installer Trade Regulation	Alta. Reg. 128/94	
Gasfitter Trade Regulation	Alta. Reg. 336/94	
Glazier Trade Regulation	Alta. Reg. 129/94	
Hairstylist Trade Regulation	Alta. Reg. 286/93	
Heavy Equipment Technician Trade	Alta. Reg. 130/94	



Regulation	
Instrument Mechanic Trade Regulation	Alta. Reg. 200/94
Insulator Trade Regulation	Alta. Reg. 19/96
Ironworker Trade Regulation	Alta. Reg. 99/95
Landscape Gardener Trade Regulation	Alta. Reg. 279/94
Lather-Interior Systems Mechanic Trade Regulation	Alta. Reg. 287/93
Locksmith Trade Regulation	Alta. Reg. 332/93
Machinist Trade Regulation	Alta. Reg. 288/93
Millwright Trade Regulation	Alta. Reg. 289/93
Motorcycle Mechanic Trade Regulation	Alta. Reg. 201/94
Painter and Decorator Trade Regulation	Alta. Reg. 280/94
Partsman Trade Regulation	Alta. Reg. 202/94
Plumber Trade Regulation	Alta. Reg. 337/94
Power Lineman Trade Regulation	Alta. Reg. 155/96
Power System Electrician Trade Regulation	Alta. Reg. 132/94
Printing and Graphic Arts Craftsman Trade Regulation	Alta. Reg. 144/94
Recreation Vehicle Service Technician Trade Regulation	Alta. Reg. 1/95
Refrigeration and Air Conditioning Mechanic Trade Regulation	Alta. Reg. 198/95
Roofer Trade Regulation	Alta. Reg. 290/93
Sawfiler Trade Regulation	Alta. Reg. 316/94
Sheet Metal Worker Trade Regulation	Alta. Reg. 199/95
Sprinkler Systems Installer Trade Regulation	Alta. Reg. 145/94
Steamfitter - Pipefitter Trade Regulation	Alta. Reg. 338/94
Structural Steel and Plate Fitter Trade Regulation	Alta. Reg. 281/94
Typesetter Trade Regulation	Alta. Reg. 133/94
Transport Refrigeration Mechanic Trade Regulation	Alta. Reg. 134/94
Water Well Driller Trade Regulation	Alta. Reg. 203/94
Welder Trade Regulation	Alta. Reg. 135/94
<b>Continued from Manpower Development Act</b>	
Tool and Die Maker Trade Regulation	Alta. Reg. 346/84

Some trade regulations have branches, or craft areas. Training and certification is available in these branch or craft areas. These include:

- Auto Body Technician.
- Communication Electrician.
- Crane and Hoisting Equipment Operator.
- Ironworker.
- Printing and Graphic Arts Craftsman.
- Sawfiler.

The development of an apprenticeship training program for this trade is under review.

# APPENDIX 1

Occupation Regulations		
Construction Craft Labourer	Alta. Reg. 237/96	<p>An occupation regulation:</p> <ul style="list-style-type: none"> <li>◦ Describes the occupation.</li> <li>◦ Describes the educational requirements to enter into a training program in the occupation.</li> <li>◦ Describes the length of the training program, including the required number of years and number of hours of on-the-job training.</li> <li>◦ Describes the requirements for certification without completion of training (“grandfathering” provisions).</li> <li>◦ Prescribes the period of time available for “grandfathering.”</li> </ul>
Gas Utility Operator	Alta. Reg. 68/95	
Plasterer	Alta. Reg. 69/95	
Warehousing	Alta. Reg. 127/96	

*Regulatory Reform  
Task Force:  
Criteria for Making  
and Keeping  
Regulations*

Government has stated that only those regulations “necessary” to ensure protection of the public interest will be retained. To meet that criteria, a regulation must:

- Be necessary for the maintenance and/or enhancement of public health, education, order or safety.
- Be necessary for the maintenance and/or enhancement of the environment.
- Contribute significantly to the goals of sustainable development.
- Contribute significantly and positively to the competitiveness of the private sector in the province, including the promotion of innovation and encouragement of efficiency in the conduct of business.
- Be necessary for effective internal administration of the government of the province.

There are also a number of questions that must be answered. These include:

- Explain how the regulation meets the criteria of being “necessary to ensure the protection of the public interest.”
- What would be the consequences of not implementing the regulation, and why?
- What non regulatory alternative methods of achieving the objective of the regulation have been considered, and why are these not acceptable?

Alberta Designated Trades and Occupations					
Optional Certification Trades			Compulsory Certification Trades		
Trade Name	Certification	Red Seal <sup>9</sup>	Trade Name	Certification	Red Seal
Agricultural Mechanic	Optional	✓	Appliance Serviceman	Compulsory	✓
Baker	Optional	✓	Auto Body Technician	Compulsory	✓
Bricklayer	Optional	✓	Automotive Service Technician	Compulsory	✓
Cabinetmaker	Optional	✓	Boilermaker	Compulsory	✓
Carpenter	Optional	✓	Crane and Hoisting Equipment Operator	Compulsory	✓
Communication Electrician	Optional		Electrician	Compulsory	✓
Concrete Finisher	Optional	✓	Electronic Technician	Compulsory	✓
Cook	Optional	✓	Elevator Constructor	Compulsory	
Electrical Rewind Mechanic	Optional	✓	Gasfitter	Compulsory	
Floorcovering Installer	Optional	✓	Hairstylist	Compulsory	✓
Glazier	Optional	✓	Heavy Equipment Technician	Compulsory	✓
Instrument Mechanic	Optional	✓	Ironworker	Compulsory	✓
Insulator	Optional	✓	Motorcycle Mechanic	Compulsory	✓
Landscape Gardener	Optional		Plumber	Compulsory	✓
Lather-Interior Systems Mechanic	Optional	✓	Recreation Vehicle Service Technician	Compulsory	✓
Locksmith	Optional		Refrigeration and Air Conditioning Mechanic	Compulsory	✓
Machinist	Optional	✓	Sheet Metal Worker	Compulsory	✓
Millwright	Optional		Steamfitter-Pipefitter	Compulsory	✓
Painter and Decorator	Optional	✓	Welder	Compulsory	✓
Partsman	Optional	✓			
Power Lineman	Optional	✓			
Power System Electrician	Optional				
Printing and Graphic Arts Craftsman	Optional				
Roofer	Optional	✓			
Sawfiler	Optional				
Sprinkler System Installer	Optional	✓			
Structural Steel and Plate Fitter	Optional	✓			
Tilessetter	Optional				
Tool and Die Maker	Optional	✓			
Transport Refrigeration Mechanic	Optional				
Water Well Driller	Optional				
<b>Designated Occupations</b>					
Construction Craft Labourer					
Plasterer					
Gas Utility Operator					
Warehousing					

<sup>9</sup> Interprovincial Standards (Red Seal) Program trade. Totals: 19 compulsory certification trades; 31 optional certification trades; 4 designated occupations.

## **Proposals**

### **Proposal 1.1 Program and process details**

The Board and the Department propose that program and process detail be removed from regulation and placed in policy.

### **Proposal 1.2 Entrance requirements**

The Board and the Department propose that entrance requirements be removed from trade regulations and be set in policy. Entrance requirements would continue to be set by the Board on the recommendation of the provincial apprenticeship committees.

### **Proposal 1.3 Journeymen/apprentice ratios**

The Board and the Department propose no change to the journeyman/apprentice ratios. They would remain in regulation and the norm would continue to be one journeyman to one apprentice. All journeyman/apprentice ratios currently in regulation, including those that are greater or less than 1:1, would be retained.

### **Proposal 1.4 Apprentice wages**

The Board and the Department propose that apprentice wages would be removed from regulation. The Board would encourage the continued recognition that fair wages, including progressive increments to wages as training levels are completed, are a cornerstone of the effective operation of Alberta's apprenticeship and industry training system.

### **Proposal 2.1 Criteria for the designation of all trades**

The Board and the Department propose that, when the Board reviews applications for designation as a trade, it consider the extent of industry support for the proposed designation, and the following, as applicable:

1. The range of skills and the depth of technical knowledge required to work in the proposed trade and industry's desire for recognition of, or training for, these skills and knowledge.
2. Whether the proposed trade would provide for a viable career.
3. The degree of overlap with existing trades, or duplication of existing training or certification in any other occupation.
4. Whether the proposed trade would require further authorization from other government departments or agencies.
5. The impact of the proposed designation in Alberta and other provinces and territories.
6. Whether the estimated annual number of new apprentices entering the proposed trade would allow a viable training program.

**Proposal 2.2 Criteria for the designation of compulsory certification trades**

The Board and the Department propose that, when the Board reviews applications for designation as a compulsory certification trade, it consider *all* of the following:

1. The extent of industry support for the proposed compulsory certification designation.
2. The *demonstrated* need for proven competency to perform the work of the trade because of one or more of:
  - (a) Dangerous substances.
  - (b) Dangerous or destructive equipment.
  - (c) Dangerous techniques or practices used in performing the work of the proposed trade.
3. The *scope and degree* to which the materials and methodology of the proposed trade, if improperly applied, may harm members of the public, or workers, or may have the resulting product or activity put the public at risk.

**Proposal 2.3 Restricted Activities**

The Board and the Department propose that provincial apprenticeship committees consider identifying restricted and non-restricted activities in their trades.

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The Board and the Department propose that the Board set standards and award credentials for the achievement of competencies in designated occupations and that the name “designated occupation” be changed.



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