SUBMISSION TO THE MINISTER OF FINANCE

JANUARY 2012







PRE-BUDGET CONSULTATION PROCESS



"The Residential
Construction Industry
is the Engine that
Drives Ontario's Economy"



OntarioHome Builders'
Association

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Stratford & Area

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Waterloo Region Greater Windsor THE RESIDENTIAL CONSTRUCTION INDUSTRY IS

the engine that drives Ontario's economy



60,433 Housing Starts Housing starts in Ontario increased by 20% in 2010 over the 50,370 housing starts recorded in 2009 during the global recession. Activity is anticipated to strengthen in 2011 with a forecast 67,400 housing starts. Each new home built in Ontario is not only a roof over the head of a family, but it provides thousands of jobs and generates significant dollars in taxes, fees and levies for all three levels of government.

358,300 Jobs The new housing and renovation sector is a significant employer in Ontario. Residential construction includes a broad range of high quality jobs from skilled trades to planners, engineers, architects, economists and lawyers.

\$39.1 billion In 2010 the value of new housing, residential renovations and impacts of other expenditures related to residential construction in Ontario totalled \$39.1 billion.

\$18.5 billion in Wages The average weekly wage in Ontario's construction sector is \$995. This compares to a \$981 average in all industries. The average construction wage is 1% higher than the overall industry wage for full-time employment in Ontario.

\$3.41 billion Total income taxes for the federal and provincial governments generated from Ontario housing starts, renovations and other related expenditures.

\$2.28 billion Total GST revenue generated from Ontario housing starts, renovations and other related expenditures.



from Ontario housing starts, renovations and other related

expenditures. The harmonized sales tax significantly increased provincial sales tax revenue on new homes and renovations when it was implemented on July 1, 2010.





ources: CMHC, Ministry of Finance, WSIB, Will Dunning Inc. All

\$1.56 billion Total CPP Premiums generated from Ontario housing starts, renovations and other related expenditures.

\$590 million Total EI Premiums generated from Ontario housing starts, renovations and other related expenditures.

\$142 million Estimated total WSIB premiums billed to the Home Builder rate group in Ontario.

OHBA PRE BUDGET SUBMISSION 🔳 JANUARY 2012

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EXECUTIVE SUMMARY

The Ontario Home Builders' Association is pleased to have the opportunity to present its view of government policy and the 2012 provincial budget. The upcoming provincial budget is especially critical as the government shifts from a stimulus focused outlook to austerity. The home building, development and renovation industries have a critical role as a partner to the broader public sector in efforts to continue to support job creation and economic growth that will assist to reduce the provincial deficit.

The past year has been a tale of two markets in Ontario, characterized by record levels of condo sales and construction activity in the GTA contrasted with a sluggish housing market throughout the rest of the province. Continued global economic volatility and uncertainty remains a significant influence on consumer confidence and a concern for the residential construction industry. Unlike the United States where fundamental structural problems continue to persist, the Ontario housing market has remained a strong driver of growth and job creation during these times of economic uncertainty.

Housing starts for 2011 are forecast to be approximately 67,400, a healthy increase from the reported 60,433 housing starts the previous year. The strong performance of the new housing industry in 2011 comes in well ahead of initial CMHC forecasts and the 2011 Ontario Provincial Budget forecast of 58,600. OHBA however cautions that underlying the headline numbers are two markets, one with strength in the GTA condo sector and the other showing weakness throughout the rest of the province. OHBA notes the over 358,300 jobs and \$39.1 billion in economic impacts generated through residential construction are a stabilizing force for the Province of Ontario. Therefore it is absolutely critical that all levels of government work with the industry to reduce barriers to growth and lay the foundation for a sustainable long-term recovery.

The next couple of years are forecast to have slower levels of residential construction activity with downside risks. The regulatory burden on new housing developments has increased in the past ten years in combination with higher levels of taxes, fees and charges – especially municipal development charges, which negatively impacts housing affordability. OHBA is concerned the combination of increasing taxes, fees, charges and regulations, declining credit conditions and the fragile economy will weigh heavily on residential construction activity. The Bank of Canada recently noted that the **adverse impact of elevated housing prices on affordability has been largely offset by low interest rates.** Furthermore the Bank of Canada has raised concerns that affordability would be considerably curtailed if interest rates were closer to historical norms.

The residential construction industry is concerned with respect to a number of provincial initiatives that may dampen the economic performance of the industry. Higher sales taxes, potential costly building code changes, mandatory WSIB coverage for independent operators, increasing municipal development charges, regulatory interia creating restrictions to land supply, a slow pace to growth plan conformity and the College of Trades are just a few



initiatives that will impact housing affordability and choice. The combined cost impacts of these numerous increased regulatory standards and fees could eliminate thousands of would-be homeowners from the housing market. A 2010 study of 21 Canadian municipalities by CMHC indicates that new home buyers in Ontario are among the most heavily taxed in Canada. Given the fragile state of the economic recovery, the province would be well advised to exercise caution when considering public policy that would negatively impact housing affordability.

The introduction of a single sales tax has had significant implications for the provincial economy since it was implemented on July 1, 2010. OHBA recognizes that the comprehensive tax reform package reduces the tax burden on new business investment as well as reducing income taxes for many Ontarians and corporate taxes for many businesses. The HST does, however, have negative sector specific implications for new housing and residential renovations. OHBA is supportive of the enhancements the province made in June 2009 to replace the initially proposed regressive dual threshold sales tax with a progressive tax structure that will be applied to new homes. The residential construction industry through our national association (Canadian Home Builders' Association) is strongly advocating for the federal government to take the same enlightened approach as the Ontario Government with respect the federal sales taxes (GST) and for the federal government to adopt a single progressive GST threshold.

Over the long-term OHBA believes the threshold for the rebate (currently \$400,000) is too low for most modest income new home buyers and should be reviewed on a regular basis to reflect inevitable increases in average new home prices. This would substantially improve housing affordability for the middle class new home buyer.

The residential renovation sector accounts for some \$21.7 billion in investment activity in Ontario and supports 200,000 jobs in the province. The introduction of the HST exacerbated the existing underground economic activity in this sector, presenting a myriad of problems including significant losses in tax revenues and increased risk to consumers. Prior to July 1, 2010 renovators applied only 5% GST to contracts, but now must apply 13% HST. **OHBA** is supportive of the Seniors Healthy Homes Renovation Tax Credit to allow seniors to improve accessibility and to age-in-place. Furthermore the collection of receipts will support legitimate business and assist to combat underground economic activity. OHBA has recommended that both the provincial and federal governments implement a more broad based permanent tax credit to encourage consumers to utilize legitimate contractors and to create a paper trail to limit underground economic activity.

Lastly, OHBA is supportive of efforts to reduce the provincial deficit and understands difficult choices must be made in the months ahead. OHBA cautions that core infrastructure funding for roads, transit, water and waste-water facilities are key building blocks to ensure that the province remains economically competitive. OHBA recognizes that as the province shifts to a new period of budget austerity that total allocations towards infrastructure will likely decline. Therefore, it is critical the budget and the 10-year capital infrastructure plan focus on targeted core infrastructure investments in support of economic growth as priority investments.



1. INTRODUCTION

1.1 About OHBA

The Ontario Home Builders' Association is the voice of the residential construction industry in Ontario. OHBA represents 4,000 member companies, organized through 29 local associations across the province. Our membership includes all disciplines involved in residential construction from core builder, land developer and renovator members to trade contractors, manufacturers, suppliers, mortgage lenders, apartment owners, housing consultants, economists, planners, architects, engineers and lawyers. The residential construction industry employed over 358,300 people and contributed over \$39.1 billion to the province's economy in 2010. From furniture and appliance manufacturers to moving companies and paint stores, to the forestry and aggregate industries as well as legal and finance professions, the new home construction and renovation industries indirectly contribute to the economic well-being of numerous related businesses and professions.

One of OHBA's primary goals is to positively affect provincial legislation as well as regulatory and tax policies that impact the industry and the broader economy. OHBA is a strong supporter of policies that will ensure affordability and choice in housing for the citizens of Ontario. OHBA annually prepares a pre-budget submission for the Government of Ontario. One of the goals of this report is to provide the government with current information on the state of the housing industry and present forecasts for the upcoming year. The second objective is to draw attention to issues that could have long-term consequences for both the housing industry and the overall economy.

2. KEY RECOMMENDATIONS

2.1 Overall Fiscal Policy

OHBA is very concerned by the size of the provincial deficit and economic turmoil impacting us at home and abroad. Ontario is not an island and declining corporate and income tax revenues combined with the need to provide fiscal stimulus into the provincial economy has made deficit spending a necessity over the short-term. However, the economic health of the province remains of the utmost importance to the public, industry and for future generations. OHBA recommends the province utilize this budget cycle to identify priorities and make difficult decisions in other areas of government policy and programs to substantially reduce the deficit. OHBA recommends the province continue to support job creation through strategic investments in strategic core infrastructure to support long-term economic growth and productivity.

2.2 Underground Economy and Residential Renovations

Sales tax avoidance is the primary reason consumers often prefer to pay cash. These 'cash deals' also cause the treasury to lose out on a myriad of other revenues including income and corporate taxes and cause other problems including building code compliance deficiencies, undermining consumer protection measures and create potential health and safety risks. Prior to the implementation of the harmonized sales tax, the underground economy was estimated by the Altus Group to represent some 37% of the total output of residential renovation contractors in Ontario. The introduction of the HST increased the sales tax burden on all building improvements from 5% to 13% and exacerbated the problem of cash deals to avoid sales taxes.

OHBA is very supportive of the Seniors Healthy Homes Renovation Tax Credit as a step in the right direction to curb underground activity (while supporting other public policy objectives). Beyond this positive policy, OHBA recommends a broad based permanent Home Renovation Tax Credit for contractor renovations at both the provincial and federal level which would strongly encourage and incent consumers to use legitimate contractors and create a paper trail to deter underground economic activity while stimulating the economy. OHBA notes that the federal *Home Renovation Tax Credit* (HRTC) was a tremendous success and that a Canada Revenue Agency (CRA) press release on Jan. 25, 2011 stated, "analysts have estimated it [HRTC] pumped an additional \$4.3 billion in renovation investment into the economy, at a time when the recession would have reduced investment in the sector."

Lastly, OHBA recommends that the province set up an *Underground Economy Task Force* with a focus on the construction sector. This task force should consult with stakeholders, examine mitigation methods in other jurisdictions as well as provide public policy and taxation recommendations to the provincial government with an objective to curb underground economic activity.



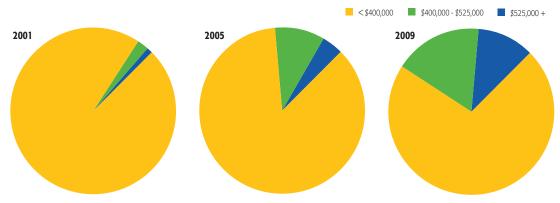
2.3 Harmonization and New Housing

The significant tax reforms to reduce both personal income and corporate income taxes as well as a shift to a single value-added sales tax in Ontario will produce long-term economic benefits for the province of Ontario. However, some sectors such as new housing are faced with changes to tax policy that will result in a heavier overall tax burden.

OHBA is supportive of the enhanced progressive tax structure introduced in June 2009 that protects housing affordability by maintaining a 2% tax on the first \$400,000 of a new home and levies additional taxes on the incremental value over \$400,000. The provincial government validated the industry concerns and made improvements to the tax structure. However, as new home prices inevitably increase over the long-term, this threshold for the rebate will become too low to reflect the purpose of the rebate — to guarantee pre-HST tax neutrality for most low and modest income new home buyers.

In light of this issue the provincial threshold should be reviewed on a regular basis. This would substantially improve housing affordability for the middle class new home buyer. Furthermore, as we have seen with the establishment of the GST threshold in 1991, it is recommended that the federal government follow the leadership example set by the Government of Ontario and eliminate the dual threshold regressive tax structure of the GST rebate and adopt a progressive single threshold for the GST.

DISTRIBUTION OF NEW HOUSING UNITS BY PRICE RANGE, ONTARIO



Source: Altus Group Economic Consulting based on data from Tarion Warranty Corporation



2.4 Infrastructure / Transportation

The residential construction industry continues to be supportive of the significant infrastructure investments the province has made over the last eight years. Periods of economic stagnation provide an opportunity for government to build and renew infrastructure through stimulus funding. These investments have supported job creation during these challenging economic times. OHBA recognizes that the province is shifting towards austerity and recommends that the province continue to make targeted 'core' infrastructure investments in transportation, water and waste-water infrastructure that supports provincial growth plans, economic development and job creation.

OHBA believes the expansion of 'core' infrastructure in support of a growing economy and growing population should be a key priority for the provincial government. However, just as important a principle is the ongoing maintenance and state of good repair for Ontario's existing infrastructure assets. The provincial government should view infrastructure not as a costly expense, but as an investment in Ontario's future. Infrastructure is the key to enhancing productivity with the goals of improving our quality of life, productivity and the competitiveness of Ontario in an ever increasingly globalized economy.

2.5 Taxes, Charges and Fees

Home builders are concerned that escalating taxes, charges and fees across Ontario are having a negative impact on housing affordability and choice. Municipalities are increasingly relying on contributions from the new housing sector through development charges and other taxes and fees rather than making politically unpopular decisions to set property taxes at appropriate levels to maintain and improve community services and amenities. Substantial increases in charges are especially problematic considering that the residential construction industry has been a key driver supporting jobs during economically challenging times. OHBA applauds the phased steps beginning in 2008 with the Provincial Municipal Fiscal and Service Delivery Review (PMFSDR) to relieve financial pressure on municipalities by phasing in a social services upload over the next decade. Furthermore, gas tax contributions from both the provincial and federal governments have relieved fiscal pressure on municipal capital infrastructure budgets. As the social services upload is implemented and gas tax funds continue to be transfered, municipalities should have greater fiscal capacity to make investments in local core infrastructure. OHBA continues to supports the Premier's commitment to maintain the current Development Charges Act (2011 AMO Conference) and to continue with the scheduled uploading plan (2011 AMO Conference) despite the current provincial deficit.



3. STATE OF THE HOUSING MARKET IN 2011

3.1 Overview - Tale of Two Markets

The residential construction industry rebounded strongly from 2010 with improved housing startsin 2011; however, activity is anticipated to moderate in 2012. CMHC is forecasting 67,400 housing starts in 2011 and 62,400 housing starts in 2012 (a key gauge of economic conditions is the measurement of a "start" of construction on a home). The new housing market in Ontario has become defined by a buoyant high-rise condominium sector welcoming activity in the GTA and a weaker provincial ground-related housing sector as a result of regulatory inertia constraining future land supply and/or waning consumer confidence.

The GTA high-rise condominium market continues to advance at a record pace and is attracting investors due to the perceived stability of the Canadian dollar, Canadian financial sector and strong real estate market. The volume of sales activity is creating pressure on the industry capacity to keep up with demand and to deliver completed units on time. The broader housing market across the province offers a stark contrast in terms of activity and outlook. Furthermore, regulatory inertia and process causing land supply restrictions are impeding growth in a number of Ontario jurisdictions.

Broader economic concerns and a stagnant jobs market are curtailing consumer confidence and ultimately demand for new housing in most Ontario communities. Ontarians without a job, or who are concerned about job security, are highly unlikely to consider purchasing or renovating a home. Consumer confidence has eased in recent months as Ontarians have become more concerned by the strength of the recovery. There remains tremendous uncertainty with downside risks in looking forward to the 2012 housing market and beyond.

- ▲ Housing starts in 2011 are expected to reach 67,400, up from last year's 60,433.
- ▲ The current 2011 forecast is up significantly from the Ministry of Finance Budget forecasts of 58,600, meaning the new housing

2011 HOUSING STARTS

INCR	EASES	DECRE	ASES				
Kingston	47%	Hamilton	-31%				
Toronto	36%	Guelph	-25%				
Kitchener	5%	London	-16%				
Sudbury	3%	Brantford	-15%				
Barrie	3%	Ottawa	-10%				

Source: CMHC

sector out-performed provincial government expectations in terms of job creation (Approximately 20,000 jobs) and tax revenue.

- ▲ Housing starts were generally stable or down in most regions across the province.
- ▲ The strength of the GTA condo market has supported the highest level of multi-unit starts in Ontario since 1988.



- ▲ The GTA condo market reached a record level of activity in 2011 with Urbanation forecasting 26,000 sales (2007 record: 22,654 sales)
- ▲ Land supply issues for many housing sectors caused in part by the slow growth plan conformity process and regulatory inertia in the GTA are limiting market potential and inflating prices despite moderate levels of activity.

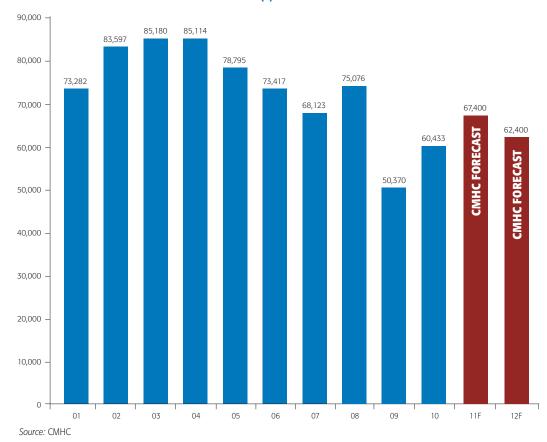
ONTARIO RESALE HOUSING

	MLS Price	MLS Sales
2004	\$246,000	197,353
2005	\$263,042	197,007
2006	\$278,455	194,793
2007	\$299,544	213,379
2008	\$302,354	181,001
2009	\$318,366	195,840
2010	\$342,245	195,591
2011F	\$362,800	195,900
2012F	\$366,100	195,900

Source: CMHC

- ▲ There are a number of risks that may impact the residential construction industry in 2012, including:
 - Broader global economic reality;
 - Consumer confidence is highly sensitive;
 - Risk of increasing mortgage rates in the second half of 2012;
 - Declining/stagnant employment;
 - Additional increases in municipal development charges;
 - Land availability, especially in the GTA and Ottawa is a major concern;
 - Underground economy.

ONTARIO NEW HOUSING STARTS - 2001-2012(F)





3.2 The Ontario Housing Market in 2011

The GTA high-rise condominium market continues to advance at a record pace, while the broader housing market across Ontario is experiencing vastly different conditions with slower levels of sales activity. Wider economic turmoil and a **weak job market** are weighing on new housing and renovation demand. People without jobs or concerned about job security simply do not buy new homes or invest in their existing home.

"We are watchful of the job market, as employment remains a key indicator of economic health and something that could dampen performance over the coming year."

2010-11 OHBA President, Bob Finnigan, December 8, 2010 Media Release

Development charges have continued to increase substantially in many jurisdictions across the province despite broader economic uncertainty and declining consumer confidence. In the GTA there are now several jurisdictions that have development charges in excess of \$40,000 for a single-family homes. Housing affordability is a major concern for the industry and should be a concern of the provincial government. If Ontario is to remain competitive in an increasingly globalized economy with a mobile workforce, it is essential that home ownership be an affordable and attainable objective for the middle class.

The renovation market was fairly resilient to the strong economic headwinds in 2011, however there has been a shift to more 'do-it-yourself' jobs and to the underground economy since the HST took effect. This will have long-term consequences for consumers, legitimate contractors and on government revenues.

Across Ontario the single detached market continued to moderate and lose market share to the very strong, but more volatile multi-unit sector. The GTA high-rise market has experienced high volumes of sales throughout the year. Canada, and in particular the Toronto and Vancouver condo markets, are viewed as an international destination of capital due to the strength of the Canadian dollar, financial systems and perceived value of Canadian real estate.

"I would caution that Ontarians without a job or with no job security are highly unlikely to purchase a new home or consider major renovations." OHBA President Doug Tarry, November 8, 2011 Media Release

Home builders are very concerned with respect to the decreasing supply of available land in Ontario. Regulatory process and inertia on approving Official Plans in conformity with growth plan principles is restricting land availability and contributing to increased costs, which reduces housing affordability. OHBA is concerned by new government policies, regulation and legislation that do not provide clear transition policies respecting the long-term status and urban needs of provincially assigned growth communities and the principles of the Provincial Policy Statement.



More expensive urban housing markets will be more vulnerable to higher mortgage carrying costs as rates will inevitably increase from current historical lows. The Bank of Canada recently noted that house prices remain very high relative to income. Since the adverse impact of elevated residential property prices on affordability has been largely offset by low interest rates, **affordability would be considerably curtailed if interest rates were closer to historical norms.** OHBA is extremely concerned that middle class buyers will be very sensitive to rate increases and that housing choice will become extremely limited for most Ontarians should rates return to historical norms.

3.3 Market Trends

The current housing cycle peaked in 2003 and 2004 with 85,180 and 85,114 housing starts respectively with housing starts dipping to 50,370 during the recession in 2009. Activity in 2011 is forecasted by CMHC to land in the middle of the previous high and low with 67,400 housing starts.

Renovation spending in 2011 is expected to have decreased by 5% from 2010. CMHC is forecasting \$21,723 billion in renovation spending in Ontario in 2011 with 2012 being on par for a forecasted \$21.831 billion in renovation expenditures. In addition,

ONTARIO HOUSING STARTS FORECAST

	2010	2011F	2012F
Single	28,089	26,400	23,600
Multi	32,344	41,000	38,800
Total	60,433	67,400	62,400

Source: CMHC

Ontario's resale market will remain steady with forecast volumes of 195,900 for both 2011 and 2012.

Short-term mortgage rates are anticipated to remain low as the Bank of Canada attempts to stimulate the economy. The last increase in the Bank of Canada overnight rate was on September 8, 2010. Posted mortgage rates are anticipated to remain at historically low levels through 2011 and 2012. CMHC forecasts the one-year posted mortgage rate to be in the 3.4% to 3.8% range in 2012 and the five-year posted mortgage rate to be in the 5.2% to 5.7% range.

"Low mortgage rates are fueling a rebound in both resale and new housing."

OHBA President James Bazely, October 8, 2009 Media Release



3.4 Economic Impact of Housing

A healthy residential construction sector is not only indicative of a sound economy in general, it is also a precursor to future growth. Economic expansion traditionally begins with rising housing starts as well as industrial and commercial development. This, in turn, leads to new infrastructure projects and institutional expansion, providing the necessary foundation for the next generation of economic activity.

FISCAL IMPACTS IN 2010, DUE TO RESIDENTIAL CONSTRUCTION ACTIVITY (millions of \$)

		New Residential Construction	Residential Renovations	Other Related Expenditures	Total
Personal Income Tax	Federal	\$ 750	\$ 1,340	\$ 170	\$ 2,260
	Provincial	\$ 380	\$ 680	\$ 90	\$ 1,150
	Total	\$ 1,130	\$ 2,020	\$ 260	\$ 3,410
Total CPP Premiums		\$ 520	\$ 920	\$ 120	\$ 1,560
Total El Premiums		\$ 210	\$ 380	\$ 50	\$ 640
GST Revenue		\$ 690	\$ 1,440	\$ 150	\$ 2,280
PST Revenue		\$ 430	\$ 1,520	\$ 170	\$ 2,120
Total Government Reve	enue	\$ 2,980	\$ 6,280	\$ 750	\$10,010

Source: Will Dunning Inc.

In 2010 the residential construction industry (both new housing and renovations) contributed over \$39 billion to the provincial economy and created an estimated 195,500 direct on-site jobs and 162,800 indirect off-site jobs, resulting in a total of 358,300 person years of employment. The total wages generated from the residential construction industry was over \$18.5 billion. The taxation revenue generated for the Federal and Provincial Governments from the residential construction industry totaled approximately \$10 billion in 2010. With the implementation of the HST the provincial share of the tax collected from the residential construction industry has increased.

"The housing start numbers released today demonstrate our resiliency as housing construction activity held its own in the face of strong global economic headwinds."

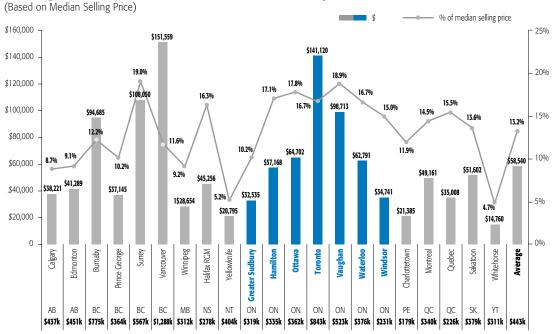
OHBA President Doug Tarry, November 8, 2011 Media Release

On average in Ontario, each new house purchased generates up to \$100,000 in taxes and fees collected by all three levels of government. In addition, there is on-going tax revenue generated year-after-year for municipalities through property taxes (i.e. MPAC notified the City of Toronto in December that the total gross assessed value of Toronto properties jumped by \$7.5 billion over 2010 values based on new construction). Add to that over \$6 billion in tax revenues collected from the renovation sector and it is obvious that our industry provides sizeable revenue to all levels of government as well as significant employment opportunities for Ontarians.



The November 2010 CMHC study Government Imposed Charges on New Housing in Canada examined new housing data for 2009 in seven Ontario municipalities (21 across Canada). The study of the full range of levies, fees, charges and taxes imposed by all levels of government determined that the government imposed charges (GICs) for median priced single-family homes ranges from a low of \$32,535 in Sudbury to a high of \$141,120 in Toronto.

New Single Detached Homes - 2009 Total Estimated Municipal, Provincial and Federal GICs

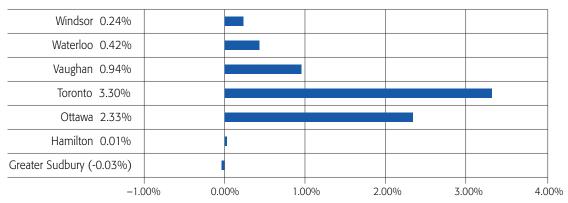


Source: Canada Mortgage and Housing Corporation

Total GICs as a percentage of the price on a median priced single-detached dwelling in the seven Ontario municipalities studied ranged from 10.2% in Sudbury to 18.9% in Vaughan. In fact, other than Sudbury, the remaining six Ontario municipalities involved in the study all had GICs of over 15% of the median selling price. Furthermore, when compared to the previous 2007 CMHC study, GICs as a percentage of overall home prices has increased across Ontario. OHBA is alarmed by the upward trend in taxation on new housing.

% Change in Municipal, Provincial and Federal Estimated Government Imposed Charges 2006 to 2009 as a share of the selling price

(Median Priced - Single Detached Unit)



Source: Canada Mortgage and Housing Corporation



The increase in GICs between the 2006 and 2009 CMHC studies are a significant concern to OHBA. Not only have the absolute GICs increased as a dollar figure per home, but GICs have increased in six of seven Ontario municipalities as a percent of the selling price since the previous CMHC study was conducted. Furthermore, the data included in the study was collected prior to the implementation of the HST.

In addition to direct government imposed charges on new housing, both the federal and provincial governments benefit tremendously from income taxes generated from those employed in the residential construction industry as well as Canada Pension Plan (CPP), Employment Insurance (EI) and Workplace Safety and Insurance Board (WSIB) premiums generated from Ontario housing starts, renovations and other related expenditures.

4. FACTORS AFFECTING HOUSING

4.1 Underground Economy and Renovations

Pressure from the underground economy continues to plague this sector of the residential construction industry, where a high percentage of work is done for "cash". These unscrupulous contractors hurt the reputations and competitiveness of legitimate professional renovators and cheat governments out of billions of dollars.

The introduction of the single sales tax (13%) has unequivocally exacerbated an existing problem (the previous 5% GST had already previously encouraged many consumers to seek 'cash deals') and also presents a myriad of issues, including losses in tax revenues and increased risks to consumers.

Some of the problems associated with the underground economy for renovations are estimated to include:

- ▲ Significant government revenue leakages such as:
 - Loss of up to \$298 million in GST revenue annually;
 - Loss of up to \$1.6 billion in income tax revenue annually;
 - Loss of up to \$767 million from other revenues such as CPP, WSIB,

EHT and Employment Insurance premiums;

- Creating barriers for the industry's future development;
- ▲ Introducing risks to consumers (financial and liability);
- ▲ Warranties are generally non-existent and consumers suffer with little or no recourse in the event of shoddy or unsafe workmanship;
- ▲ Health and safety risks to construction workers;
- ▲ Undermining the integrity of the tax system;
- The legitimate contractor has difficulty competing with the underground operator.

The \$21.7 billion renovation sector that employs over 200,000 Ontarians is particularly vulnerable to the 'cash deal'. OHBA is concerned that the 13% single sales tax has had a negative impact on renovations. In a report released in November 2009, the Altus Group states:

- ▲ The single sales tax will increase the annual tax burden on homeowners and rental housing investors in the province by some \$757 million annually and triple the sales tax rate on contractors' renovations in Ontario (the contractor renovation segment accounts for about 70% of renovation investment in the province);
- ▲ The introduction of the single sales tax will reduce the volume of renovation activity by professional contractors because of the higher costs for homeowners, resulting in lower economic activity and employment in the province;



- ▲ The single sales tax may shift more renovation and repair jobs from professional contractor assignments to do-it yourself projects. The shift to do-it-yourself work could have long-term negative consequences for the quality of the existing housing stock in Ontario;
- ▲ The single sales tax is likely to shift more activity into the "underground economy" with implications on government tax revenue, renovation quality and homeowner liability.

"Too often, homeowners leap into agreements with unprofessional renovators without knowing about the company or quality of work they perform."

2008-09 OHBA President Frank Giannone, January 28, 2009 Media Release

To mitigate the impact of the cumulative 13% sales tax on the underground, OHBA recommends that:

- ▲ Both the provincial and federal governments introduce permanent broad based Home Renovation Tax Credits for their portions of the HST. The rebates should go directly to consumers to encourage the collection of receipts from legitimate business;
- ▲ The Ontario government should implement a permanent broad based Home Renovation Tax Credit for contractor renovations, which would rebate 5.4% of the contract value on all qualifying contractor renovations. The 5.4% is calculated as the difference between the 8% provincial portion of the HST, and the 2.6% estimated to be previously have been embedded in contractor renovations as a result of Provincial Sales Tax.
- ▲ The Federal Government should implement a new permanent broad based Home Renovation Tax Credit following the success of the Home Renovation Tax Credit, which would rebate 2.5% of the contract value on all qualifying contractor renovations. The 2.5% is calculated as the difference between the 5% GST and the 2.5% estimated to previously have been embedded in contractor renovations under the Federal Sales Tax.

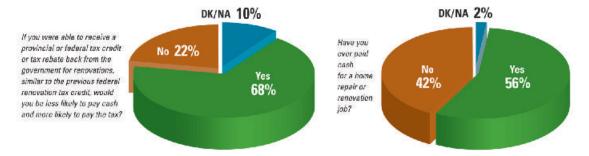
"If a rebate system was in place it would encourage consumers to ask a renovator for receipts, creating a paper trail for the Canada Revenue Agency to monitor. A rebate program is a responsible, targeted policy that will shed light on the underground economy"

OHBA 2010-11 President Bob Finnigan, November 9, 2010 Media Release

A poll by Environics Research found that a majority of Ontarians have paid cash for a renovation job and that a government tax credit or rebate would provide an incentive for consumers to pay for legitimate contractors. In an Environics survey commissioned by OHBA, 56 per cent of Ontarians admitted they have paid cash and avoided taxes for a renovation or repair job. The results of this survey demonstrate the scope of the problem and the need for an effective solution.



More than two-thirds surveyed said that they would be less likely to pay cash if they were to receive a provincial or federal tax credit back from the government. The survey, conducted by Environics Research, polled 1113 home owners throughout the province. The margin of error is \pm 2.9%, 19 times out of 20.



Government and industry are taking positive steps to curb underground activity. OHBA is supportive of the *Healthy Homes Renovation Tax Credit* to allow seniors greater flexibility to age-in-place and to support legitimate businesses through the collection of receipts.

OHBA, through its renovator members, continues to educate consumers about the perils of dealing with contractors in the underground economy and encourages potential customers to pursue the skills of a professional contractor. OHBA is supportive of the RenoMark™ Program and all 29 local Ontario home builders associations are licensed RenoMark™ providers. In order to be a member in good standing with RenoMark™, renovator members have agreed to abide by a set of standards which ensure transparency and accountability. Some measures include: offering a minimum two-year warranty on all work, carrying a minimum of \$2 million liability insurance, having proper insurance coverage and only employing subcontractors that carry such coverage and carry applicable licenses and permits for each job.

"In an aging society, adapting and improving Ontario's housing stock with retrofits to improve accessibility is an important recognition of our changing demographic realities and the value of renovations conducted by professional contractors."

OHBA President Doug Tarry, November 23, 2011 Media Release

Lastly, OHBA recommends that the province set up an *Underground Economy Task Force* with a focus on the construction sector with the following objectives:

- ▲ Consult with diverse stakeholder groups including OHBA regarding the underground economy;
- A Research best practices for underground mitigation methods in other jurisdictions;
- ▲ Provide recommendations with respect to tax policy, regulatory policy, red tape reduction, enforcement activities, incentives and information sharing between agencies to combat underground economic activity;
- ▲ Consider province-wide campaigns to raise public awareness of the negative impact of the underground economy in the home renovation industry.



4.2 Government Imposed Charges (GICs)

Home builders support the financing of infrastructure directly tied to the communities they build. New communities also bring important new property assessment to municipalities across the province and provide an important residential population base to support job growth. The residential construction industry through our new home buyers pay for the direct onsite infrastructure while also contributing towards upstream capital costs related to growth. Additionally, the home building and development industry supports the economy through both direct and indirect jobs and the additional tax revenue generated for all three levels of government.

Our members are, however, concerned that many municipal politicians have viewed new home buyers as an easy target for additional taxes, levies and fees while artificially suppressing property taxes for rate payers to appease existing municipal voters. OHBA is concerned that charges and fees derived from housing developments in many municipalities have **escalated beyond a reasonable direct cost recovery level** and are being viewed as a general revenue source. Home builders support paying for growth related infrastructure, however, existing home owners are not paying their fair share to maintain and improve community services and amenities through property taxes. New home buyers have proven to be the path of least resistance for municipal politicians to implement higher taxes, fees and charges. OHBA understands that many municipalities are fiscally challenged; however, it is not the responsibility of new housing consumers to substitute for general tax base revenue that should fund the maintenance and imporvement of existing community amenities and services.

2009 TOTAL ESTIMATED MUNICIPAL, PROVINCIAL AND FEDERAL GOVERNMENT IMPOSED CHARGES FOR NEW DETACHED DWELLINGS WITH MEDIAN SELLING PRICES

De	creasing valu	e of GICs (%	%)	Decrea	sing value o		
Centre	Median Selling Price	Total GICs	% of Selling Price	Centre	Median Selling Price	Total GICs	% of Selling Price
Vaughan	\$523,295	\$98,713	18.86%	Toronto	\$842,743	\$141,120	16.75%
Ottawa	\$362,489	\$64,702	17.85%	Vaughan	\$523,295	\$98,713	18.86%
Hamilton	\$335,141	\$57,168	17.06%	Ottawa	\$362,489	\$64,702	17.85%
Toronto	\$842,743	\$141,120	16.75%	Waterloo	\$375,903	\$62,791	16.70%
Waterloo	\$375,903	\$62,791	16.70%	Hamilton	\$335,141	\$57,168	17.06%
Windsor	\$231,428	\$34,741	15.01%	Windsor	\$231,428	\$34,741	15.01%
Greater Sudbury	\$318,663	\$32,535	10.21%	Greater Sudbury	\$318,663	\$32,535	10.21%

Source: Canada Mortgage and Housing Corporation

In 2010 CMHC conducted a study (2009 data) of the total Government Imposed Charges (GICs) paid on median priced new detached dwellings in 21 municipalities across Canada. This includes all municipal and provincial GICs, and the federal GST. The chart on page 12 illustrates the total GICs paid in the seven Ontario municipalities as included in the study.



Government Imposed Charges are a challenge for the residential construction industry and present an affordability barrier for new home buyers. In Ontario GICs in the seven municipalities included in the CMHC study represent 10.2% - 18.9% of the price on a median priced single-detached dwelling and increased as a portion of housing prices since the previous study in 2007. In comparison to other jurisdictions across Canada, Ontarians typically pay higher Government Imposed Charges as a percentage of the price of a new home.

- Development Charges
 - Municipal Development Charges
 - Regional Development Charges
 - Education Development Charges
 - GO Transit Development Charges
- Various Additional Municipal Charges
 - Storm Water Management
 - Topsoil Removal Fee
 - Regional Water Meter Fee
 - Engineering Design Review and Inspection fee
 - Public Art Charges
 - Engineering Fees
 - Parkland Dedication Fees (Cash-in-Lieu)
 - Building Permit Fees
 - Section 37
- Planning Fees (Various Development Application & Processing Fees)
 - Plan of Subdivision (singles and row houses)
 - Plan of Subdivision Registration/Review
 - Site plan approval
 - Plan of Condominium

- Ministry of Environment Engineering Review
- Land Registry Closing Fees (Title Registration)
- Conservation Authority Fees
- Electrical Permit Electrical Safety Authority
- Legal Fees
- Land Transfer Tax
 - Provincial LTT
 - Toronto LTT
- HST (Provincial portion + GST)
- Costs associated with municipal by-laws
- Additional costs due to building code changes
- WSIB Premiums (Home Builder Rate Group) + WSIB Premiums passed on to builders by trades
- Surcharges imposed by trades to cover potential Ministry of Labour safety fines
- Tarion Registration Fees
- Tarion Enrolment fees

For more detailed information from the CMHC 2010 study, please see Appendix B.



4.3 Updating HST Thresholds

The implementation of a single sales tax in combination with income and corporate tax reductions was initiated by the provincial government to encourage investment and job growth. OHBA recognizes that the shift to a value-added tax will yield long-term economic benefits for capital investment, income growth and job creation. Furthermore the tax reform package includes personal income tax cuts, enhanced property tax credits, an elimination of the small business deduction surtax and a reduction in the corporate income tax. However, the harmonized sales tax has significant industry specific taxation implications for residential construction.

The initial harmonized sales tax proposal would have resulted in significant taxation increases for new housing and was based on a regressive tax structure with dual thresholds that the federal government implemented when the GST was introduced. The initially proposed tax structure would have implemented the highest marginal tax rates on the middle class with a claw-back of the rebate on new homes valued above \$400,000 and a complete elimination of the rebate on new homes valued over \$500,000. This proposed tax structure would have been devastating for housing affordability and would have created significant market distortions, especially to the middle class in urban communities with higher land values.

TOTAL PROVINCIAL TAXES AND MARGINAL TAX RATE ON NEW HOUSING UNDER ORIGINAL HST PROPOSAL (March 2009)



TOTAL PROVINCIAL TAXES AND MARGINAL TAX RATE ON NEW HOUSING UNDER REVISED HST STRUCTURE (June 2009





In June 2009, in response to industry concerns presented by OHBA regarding the proposed tax structure, marginal tax rate issues and on the quantum of the proposed tax increase the provincial government implemented an **enhanced progressive tax structure** for the application of HST on new housing. OHBA is supportive of the enhancements the provincial government made to the tax structure as it applies to new housing and is strongly advocating through our national association (CHBA) for the federal government to adopt the same progressive tax structure as it applies to the GST and new housing.

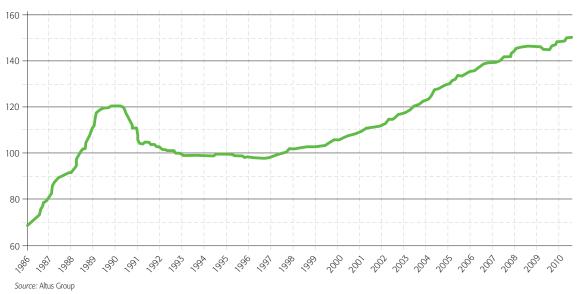
"The Provincial government has made positive changes to the harmonized sales tax structure as it applies to new housing and has listened to the concerns of new homebuyers and the tens of thousands of hard working Ontarians employed in the residential construction industry."

2008-09 OHBA President Frank Giannone, June 19, 2009 Media Release immediately following the provincial announcement of changes to tax structure as it applies to new housing

When the federal government first introduced the GST and the New Housing Rebate, it committed to adjust the thresholds "at least every two years" to ensure that they continued to reflect changes in housing prices, and thus to protect housing affordability over time in all parts of Canada. Although the federal government has not delivered on this commitment, the principle that it established – the protection of housing affordability through appropriate rebate threshold adjustments, remains important. Ontario has been silent on the issue of future adjustments to the threshold used in its New Housing Rebate. OHBA recommends that a provincial commitment should be made to revisit the 'threshold' value from time-to-time.

NEW HOUSING PRICES IN ONTARIO, 1986-2010

New Housing Price Index (1997 = 100)





Ontario housing prices tend to rise over time and in the decade leading up to 2008, the new housing price index has increased some 46%, compared with general inflation that rose by 26%; and median family income which advanced by 18%. As a result of faster housing price appreciation, an ever growing share of new homes are valued above the threshold, yet a large number of households living in homes valued above \$400,000 are middle income families. The HST on new homes valued over \$400,000 significantly pushes up housing costs and increases the financial burden on middle class families.

To mitigate the negative effects and avoid further erosion in housing affordability in the coming years, the **threshold of the tax rebate on new housing must be reviewed regularly.** This will ensure that the tax rebate continues to reflect changes in housing prices and protect housing affordability over time.

4.4 Infrastructure

Infrastructure stimulus is the most important tool the government has to create jobs in the short-term and to lay the foundation for future economic expansion, prosperity and productivity gains. Our members are very concerned about the province's infrastructure deficit. OHBA recognizes the challenge of eliminating the infrastructure deficit as the province shifts towards austerity. OHBA therefore recommends that the province make **targeted core infrastructure investments** that support provincial growth plans, economic development and job creation.

The ten-year capital infrastructure plan is of key importance to the residential construction industry. **Investments made by the public sector facilitate additional private sector investment and job creation from our members.** Providing stability and predictability as to when and where infrastructure dollars are going to be spent, will allow for the private sector to adequately plan projects and target investments to utilize new and upgraded public infrastructure facilities.

The long-term white-belt lands in the GTA are of critical importance for future economic growth and will house significant core infrastructure resources. OHBA is concerned by potential land restrictions in the long-term strategic white-belt urban reserve lands that act as a buffer between the greenbelt and current urban area. Conservation Authorities and new species designations under the Endangered Species Act continue to carve up white-belt lands with ever increasing buffers, creating a fragmented supply of developable land. Many municipalities have financed existing infrastructure based on forecasted development charges revenue and assessment growth of residential, commercial and industrial growth into the white-belt. Land supply issues across the province are reducing housing affordability, impacting infrastructure planning and limiting housing options for Ontarians.

In September 2009 the OHBA passed a resolution stating: "Infrastructure stimulus funding that is currently being rolled out to support economic growth should place a strong emphasis on expanding, upgrading and enhancing *core infrastructure* that supports housing intensification". OHBA's definition of core infrastructure typically includes: roads and bridges; public transit; water supply and waste water treatment systems.



Core infrastructure consists of the key building blocks for a growing economy and population. The provincial government should place core infrastructure as a priority over other types of community infrastructure. Roads, bridges, water, waste-water and public transit facilities support additional value added private sector investments from a variety of sectors including the residential construction industry.

"The continued stimulus funding focusing on infrastructure and job creation will spur growth and solidify Ontario's path to recovery."

2009-10 OHBA President James Bazely, March 25, 2010 Media Release

The province should consider creative solutions and partnerships to front-end finance infrastructure through targeted incentives and fast-tracked approvals. Furthermore the province should aggressively reduce regulatory barriers that hold up critical infrastructure projects in red tape and result in higher costs. The current economic situation should be a catalyst for government to analyze infrastructure approvals, funding and delivery in search of improvements.

Infrastructure is the key to enhancing productivity with the goals of improving our quality of life, productivity and the competitiveness of Ontario in an ever increasingly globalized economy. OHBA recommends that the Provincial Government tie infrastructure funding agreements to important provincial goals and objectives outlined in the PPS and growth plan. Major infrastructure projects and specifically public transit projects should include conditions for 'as-of-right zoning' to reduce the barriers of intensification, encourage investment and ensure the highest and best use of scarce public dollars. The home building and development industry require greater certainty and speedier implementation timelines to encourage additional investment that will support transportation corridors, urban growth centres and mobility hubs. The province should take a more aggressive approach to implement provincial transportation infrastructure and land-use goals and objectives that support economic development.



5. CONCLUSION

5.1 Conclusion

With Ontario dealing with a global economic downturn that is largely beyond its control, the province is facing significant budgetary challenges. OHBA recognizes that the province has limited policy and taxation tools to counter strong global economic headwinds that have come our way. The province must demonstrate strong leadership and be prepared to make difficult decisions. OHBA respectfully submits that job creation and economic development should be considered as the priorities in the 2012 budget and broader public policy agenda. OHBA recommends a thorough regulatory review of public policies with the goal of improving and ensuring a competitive business environment. Furthermore, targeted core infrastructure investments that support provincial growth plans, job creation and economic development should remain a key focus of the upcoming budget.

The implementation of the HST in combination with income and corporate tax reductions is a step the province took to encourage investment and job growth. However, the tax reforms have had direct impacts for a number of affected industries including residential construction. OHBA is supportive of the of the enhancements made to the tax structure as it applies to new housing and is strongly advocating through our national association for the federal government to adopt the same progressive tax structure as it applies to the GST and new housing. However, the province must commit to a regular review of the \$400,000 threshold to ensure middle class homebuyers are not overburdened by taxation as new home prices inevitably increase in the years ahead.

OHBA is very concerned about the volume of underground activity in the renovation sector. OHBA is seeking a joint federal and provincial solution to this issue through a broad based permanent renovation tax credit to encourage the use of legitimate contractors and limit government revenue leakage to the underground. OHBA is very supportive of the *Healthy Homes Renovation Tax Credit* as a positive measure and has also recommended an interministerial task force to examine potential solutions to underground economic activity in the construction sector.

OHBA is pleased to have a respectful and constructive working relationship with many government ministries. Our membership is, however, deeply concerned that the unintended consequences of some government policies will result in an escalation of housing prices, decreasing affordability and a lack of housing choice. OHBA notes that despite broader economic turmoil, that the residential construction industry was extremely resilient in 2011 and was a key driver of growth and job creation. OHBA looks forward to working together with the Province of Ontario to ensure our industry remains a leader and is **the engine that drives the provincial economy**.





APPENDIX

THE RESIDENTIAL CONSTRUCTION INDUSTRY IS

the engine that drives Ontario's economy



Ontario
Home Builders'
Association

29 LOCAL ASSOCIATIONS



60,433 Housing Starts Housing starts in Ontario increased by 20% in 2010 over the 50,370 housing starts recorded in 2009 during the global recession. Activity is anticipated to soften in 2011 with a forecast 56,200 housing starts. Each new

to soften in 2011 with a forecast 56,200 housing starts. Each new home built in Ontario is not only a roof over the head of a family, but it provides thousands of jobs and generates significant dollars in taxes, fees and levies for all three levels of government.

358,300 Jobs The new housing and renovation sector is a significant employer in Ontario. Residential construction includes a broad range of high quality jobs from skilled trades to planners, engineers, architects, economists and lawyers.

\$39.1 billion In 2010 the value of new housing, residential renovations and impacts of other expenditures related to residential construction in Ontario totalled \$39.1 billion.

\$18.5 billion in Wages The average weekly wage in Ontario's construction sector is \$995. This compares to a \$981 average in all industries. The average construction wage is 1% higher than the overall industry wage for full-time employment in Ontario.

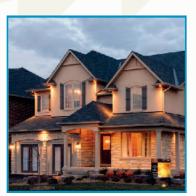
\$3.41 billion Total income taxes for the federal and provincial governments generated from Ontario housing starts, renovations and other related expenditures.

\$2.28 billion Total GST revenue generated from Ontario housing starts, renovations and other related expenditures.

\$2.12 billion Total PST/HST revenue generated from Ontario housing starts, renovations and other related

expenditures. The harmonized sales tax significantly increased provincial sales tax revenue on new homes and renovations when it was implemented on July 1, 2010.





\$1.56 billion Total CPP Premiums generated from Ontario housing starts, renovations and other related expenditures.

\$590 million Total EI Premiums generated from Ontario housing starts, renovations and other related expenditures.

\$142 million Estimated total WSIB premiums billed to the Home Builder rate group in Ontario.

BILD **Brantford Chatham-Kent Greater Dufferin Durham Region** Grey-Bruce **Guelph & District** Haldimand-Norfolk **Haliburton County Hamilton-Halton Kingston-Frontenac** Lanark-Leeds London Niagara **North Bay & District Greater Ottawa** Peterborough & the Kawarthas Quinte **Renfrew County** Sarnia-Lambton Saugeen Country **Seaway Valley Simcoe County** St. Thomas-Elgin **Stratford & Area Sudbury&District Thunder Bay Waterloo Region Greater Windsor**

Ontario Home Builders' Association

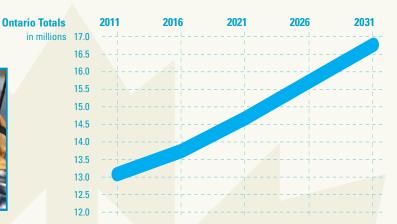
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Ontario's Population Estimates by OHBA Local





OHBA Local	2011	2016	2021	2026	2031
Greater Barrie (Simcoe Country)	461,507	493,694	555,929	630,687	709,855
BILD (Toronto, York, Peel)	5,066,195	5,331,937	5,632,970	5,901,512	6,169,108
Brantford (Brant County)	140,434	147,679	162,633	182,585	203,711
Chatham-Kent	111,841	111,831	111,683	110,984	110,211
Greater Dufferin	59,759	65,496	74,105	84,073	94,628
Durham Region	624,233	667,588	744,357	851,912	978,428
Grey-Bruce	165,103	168,094	172,424	176,805	181,405
Guelph (Wellington County)	216,878	231,108	262,498	309,237	361,908
Haldimand-Norfolk	112,692	114,535	117,190	119,823	122,583
Haliburton County	17,006	17,655	18,616	19,681	20,806
Hamilton-Halton	1,035,453	1,104,973	1,217,998	1,344,917	1,479,245
Kingston-Frontenac	152,326	155,925	161,189	166,742	172,589
Lanark-Leeds	170,650	173,264	177,017	180,687	184,530
London (Middlesex)	455,714	470,910	498,087	528,318	560,254
Niagara	448,951	461,758	484,197	514,411	546,334
North Bay & District (Nipissing Dist	rict) 87,265	87,787	88,473	88,882	89,290
Greater Ottawa	883,661	913,940	978,941	1,069,021	1,164,327
Peterborough & The Kawarthas	218,182	229,288	252,355	281,608	312,577
Quinte (Hastings)	139,476	143,415	149,209	155,453	162,036
Renfrew County	103,135	105,074	107,885	110,749	113,757
Sarnia-Lambton	133,299	134,004	134,914	135,373	135,822
Saugeen County (South Bruce)	67,817	68,556	69,593	70,510	71,464
Seaway Valley					
(Stormont, Dundas & Glengarry Unit		116,921	118,378	119,571	120,803
St. Thomas - Elgin	91,732	94,840	99,434	104,473	109,791
Stratford & Area (Perth)	77,726	78,231	78,903	79,339	79,780
Greater Sudbury	166,188	168,307	171,317	174,123	177,051
Thunder Bay	151,116	148,620	144,665	139,251	133,465
Waterloo Region	525,913	561,013	618,886	693,719	772,949
Greater Windsor (Essex)	411,630	423,586	446,386	471,616	498,260

Sub-Total of OHBA Locals 12.411.749 12.990.028 13.850.232 14.816.063 15.836.968 **Ontario Totals** 13,221,487 13,809,227 14,682,788 15,660,730

Note: Grey-Bruce includes the population for all of Bruce; South Bruce also includes the population of all of Bruce.



Ontario Home Builders' **Association**

OHBA represents **4,000** member companies organized into a network of 29 local associations across the province.

Together we build 80% of the new housing in Ontario.

Ontario Home Builders' Association

20 Upjohn Road, Suite 101

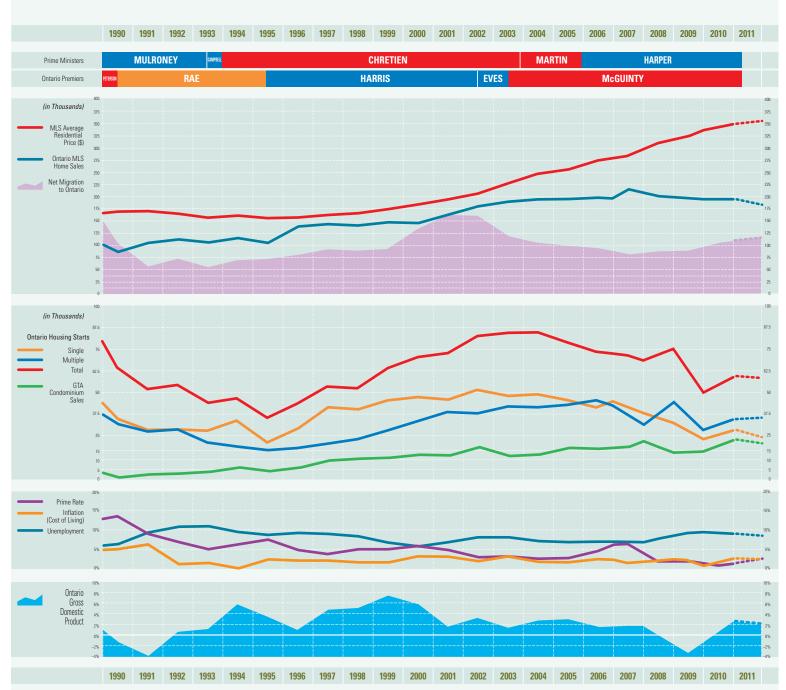
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1990-2011

Ontario Housing & Economic Indicators





Source: Statistics Canada, CREA, CMHC, Bank of Canada, Ministry of Finance, Urbanation

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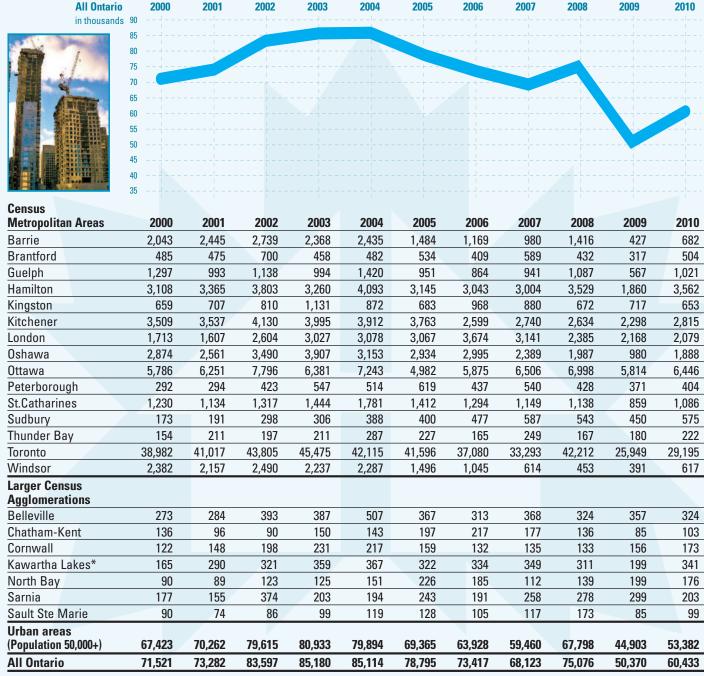
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Total Housing Starts Ontario 2000-2010





^{*} Prior to 2002, Kawartha Lakes data includes Lindsay Town, Ops Township, Fenelon Township, Laxton Township, Mariposa Township and Sturgeon Point Village

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Detailed Government Imposed Charges Breakdown on Median Priced New Single-Detached Dwellings (2009)



			М	JNICIPAL	CHARGE	S			PF	ROVINCIA	\L		FEDERAL		
Municipality	Median Price	DCs	Land Dedication	Process Fees	Building Permit	LTT	Total	PST	Registry Transfer	Warranty	Other	Total	GST	Total GICS	% of Price
Surrey	\$567 K	\$40.7K	\$12,444	\$240	\$3,514	-	\$56.7 K	\$12.3K	\$9,418	\$1000	\$25	\$22.7K	\$28.4K	\$108,050	19.05%
Vaughan	\$523 K	\$35.5K	\$10,500	\$1,815	\$2,536	-	\$50.4 K	\$12.0K	\$8,865	\$1,130	\$185	\$22.2K	\$26.1K	\$98,713	18.86%
Ottawa	\$362 K	\$26.8K	\$4,413	\$2,204	\$2,813	-	\$36.2 K	\$10.8K	\$3,987	\$881	\$185	\$15.9K	\$28.5K	\$64,702	17.85%
Hamilton	\$335 K	\$22.9K	\$5,000	\$598	\$2,464	-	\$30.9 K	\$10.9K	\$3,572	\$802	\$185	\$15.5K	\$10.7K	\$57,168	17.06%
Toronto	\$843 K	\$15.4K	\$24,545	\$970	\$4,820	\$20K	\$65.7 K	\$11.5K	\$20,046	\$1,469	\$185	\$33.2K	\$42.1K	\$141,120	16.75%
Waterloo	\$376 K	\$25.4K	\$4,800	\$1,220	\$1,760	-	\$33.2 K	\$10.2K	\$4,189	\$881	\$185	\$15.5K	\$14.1K	\$62,791	16.70%
Halifax	\$278 K	\$2,023	\$5,750	\$31	\$1,681	\$4.1K	\$13.6 K	\$22.2K	\$84	\$373	\$60	\$22.7K	\$ 8.9K	\$45,256	16.30%
Quebec City	\$226 K	-	\$6,750	\$50	\$300	-	\$ 7.1 K	\$17.5K	\$2,145	\$960	\$133	\$20.7K	\$ 7.2K	\$35,008	15.52%
Windsor	\$231 K	\$12.3K	\$2,475	\$318	\$1,795	-	\$16.9 K	\$ 7.5K	\$2,114	\$644	\$185	\$10.4K	\$ 7.4K	\$34,741	15.01%
Montreal	\$340 K	-	\$5,200	\$283	\$1,629	-	\$ 7.1 K	\$26.3K	\$3,738	\$1000	\$133	\$31.2K	\$10.9K	\$49,161	14.47%
Saskatoon	\$379 K	\$26.3K	\$1,364	\$193	\$1,160	-	\$29.0 K	\$ 6.1K	\$1,137	\$875	-	\$ 8.1K	\$14.5K	\$51,602	13.61%
Burnaby	\$775 K	\$4,530	\$6,521	\$47	\$7,105	-	\$18.2 K	\$23.1K	\$13,583	\$1000	\$25	\$37.7K	\$38.7K	\$94,685	12.21%
Charlottetown	\$179 K	-	\$4,500	\$25	\$300	-	\$ 4.8	\$8.0 K	\$2,166	\$347	\$283	\$10.8K	\$ 5.7K	\$21,385	11.94%
Vancouver	\$1,288K	\$17.9K	-	\$2,365	\$5,569	-	\$25.8 K	\$36.5K	\$23,836	\$1000	\$27	\$61.3K	\$64.4K	\$151,559	11.77%
Sudbury	\$319 K	\$3,371	\$3,750	\$244	\$2,256	-	\$ 9.6 K	\$ 8.4K	\$3,330	\$802	\$185	\$12.7K	\$10.2K	\$32,535	10.21%
Prince George	\$364 K	\$4,724	\$920	\$198	\$2,001	-	\$ 7.8 K	\$10.1K	\$5,363	\$1000	\$25	\$16.5K	\$12.8K	\$37,145	10.19%
Winnipeg	\$312 K	\$3,400	\$861	\$240	\$1,750	-	\$ 6.3 K	\$ 7.6K	\$3,969	\$875	-	\$12.4K	\$10.0K	\$28,654	9.17%
Edmonton	\$451 K	\$13.2K	\$1,023	\$718	\$2,721	-	\$17.7 K	-	\$125	\$875	\$13	\$ 1.0K	\$22.6K	\$41,289	9.15%
Calgary	\$437 K	\$11.4K	\$1,591	\$1,429	\$1,811	-	\$16.2 K	-	\$122	\$875	-	\$ 1.0K	\$21.0K	\$38,221	8.75%
Yellowknife	\$404 K	\$135	-	\$175	\$2,609	-	\$ 2.9 K	-	\$606	-	-	\$ 0.6	\$ 9.9K	\$20,795	5.15%
Whitehorse	\$311 K	\$2,500	\$555	\$100	\$1,558	-	\$ 4.7 K	-	\$101	-	-	\$ 0.1	\$17.3K	\$14,760	4.75%

Source: Government-Imposed Charges on New Housing in Canada, CMHC (2010)

Ontario Home Builders' Association

MEDIA RELEASE

2012 BUDGET SUBMISSION APPENDIX C

OHBA Renovators Support Reno Tax Rebates Positive Measure will Combat a Growing Underground Economy

November 23, 2011 – Toronto, ON – The Ontario Home Builders' Association (OHBA) supports the Minister of Finance, Hon. Dwight Duncan's announcement to implement a *Healthy Home Renovation Tax Credit* as part of the Fall Economic Statement. Homeowners will qualify for a tax credit when they make a home retrofit for accessibility purposes allowing seniors to age-in-place, improve the quality of Ontario's aging housing stock and stimulate the economy.

OHBA President Doug Tarry said, "in an aging society adapting and improving Ontario's housing stock with retrofits to improve accessibility is an important recognition of our changing demographic realities and the value of renovations conducted by professional contractors."

Tarry commented, "the underground 'cash' economy is rampant in the renovation sector and the Seniors Healthy Home Renovation Tax Credit will encourage home owners to collect receipts and hire legitimate business rather than paying cash under the table." Of the over \$23 billion spent on renovations in Ontario, it is estimated over \$5 billion is conducted by illegal underground contractors.

Earlier this year the CRA noted that 3 million Canadian participated in the stimulus focused federal *Home Renovation Tax Credit*, which gave the Canadian economy a shot in the arm in the midst of the worldwide economic crisis. Analysts have estimated it pumped an additional \$4.3 billion in renovation investment into the economy as well as reduced underground economic activity through the collection of tax receipts.

The Ontario Home Builders' Association with over 500 renovator members is the voice of the residential construction industry in Ontario representing 4,000 member companies organized into 29 local associations across the province.

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For further information or to arrange interviews please contact Stephen Hamilton at 416-578-5800

OntarioHome Builders' Association

MEDIA RELEASE

2012 BUDGET SUBMISSION APPENDIX D

Consumers Back Reno Tax RebatesTo Combat A Growing Underground Economy

November 9, 2010 – Toronto, ON – A recent poll by Environics Research found that a significant majority of Ontarians have paid cash for a renovation job and that a government tax credit or rebate would provide an incentive for consumers to pay for legitimate contractors. In the survey commissioned by the Ontario Home Builders' Association, 56 per cent of Ontarians admitted they have paid cash and avoided taxes for a renovation or repair job. With the recent introduction of the HST, renovators now have to charge 13% on all their work, whereas previously it was the 5% GST - these additional taxes have only served to fuel the underground economy.

OHBA President Bob Finnigan noted, "The Ontario Home Builders' Association along with the Canadian Home Builders' Association have urged the federal and provincial governments to take action on the growing underground economy. The results of this survey demonstrate the scope of the problem and the need for an effective solution."

More than two-thirds surveyed said that they would be less likely to pay cash if they were to receive a provincial or federal tax credit back from the government. OHBA Renovators' Council Chair and Ottawa-area renovator, Mike Martin noted "I am not surprised at all by the findings. This only confirms what I am hearing within my own company and colleagues in the field." Added Martin, "a provincial or federal rebate, similar to the now cancelled Home Renovation Tax Credit would be a great deterrent to cash jobs."

President Finnigan also noted that, "If a rebate system was in place it would encourage consumers to ask renovators for receipts, creating a paper trail for Canada Revenue Agency to monitor." Added Finnigan, "A rebate program is a responsible, targeted policy that will shed light on the underground economy."

The residential renovation sector accounts for over \$20.3 billion in investment activity in Ontario, supporting about 195,000 jobs. Contractor renovations make up about 69% or \$14 billion of that total. In Ontario it is estimated that over \$2.6 billion in potential tax revenue is lost due to cash payments for underground renovations.

OHBA also notes that the consequences of paying cash under-the-table for this kind of work can have dire results for homeowners. Consumers often do not have legal recourse and could be subject to significant liability if an accident happens within the home. Illegal renovations introduce health and safety risks to construction workers and the homeowners that hire them.

The survey, conducted by Environics Research, polled 1113 home owners throughout the province . The margin of error is \pm +/- 2.9%, 19 times out of 20.

Ontario Home Builders' Association

Pre-Budget Submission Appendix E

OHBA Resolutions 2011 – 2012

RESOLUTION # 1 (External)

<u>Submitted to:</u> Ontario Ministry of Labour

Ontario Ministry of Revenue

Ontario Ministry of Municipal Affairs and Housing
Ontario Workplace Safety and Insurance Board

Federal Minister of State (Small Business and Tourism)

Canada Revenue Agency

Submitted by: OHBA Executive Committee

Date: September 22, 2011

<u>Subject:</u> Underground Economy Task Force

Whereas: The underground economy remains a serious challenge in the construction industry and across many other sectors. It is a source of revenue loss to all levels of government and various government agencies as well as threatening the competitiveness of legitimate business; and

Whereas: Underground economic activity in the construction industry measures in the billions of dollars in Ontario. It compromises the health and safety of workers and the public, exposes consumers to liability risks, and it undermines employment standards; and

Whereas: The provincial government has not conducted a comprehensive examination into all aspects of the underground economy in the construction sector in a number of years. In 2005 the Joint Advisory Implementation Group (JAIG) conducted a very focused probe into aspects of underground construction activity as it relates to the WSIB; and

Whereas: A significant reduction of underground activity will improve health and safety, limit risk exposure to consumers, increase government taxation revenue and create a fairer, more competitive environment for all construction companies; and

Therefore be it resolved that: the provincial government set up an Underground Economy Task Force with a focus on the construction sector to:

- Consult with diverse stakeholder groups including OHBA regarding the underground economy;
- Research best practices for underground mitigation methods in other jurisdictions;
- Provide recommendations with respect to tax policy, regulatory policy, red tape reduction, enforcement
 activities, incentives and information sharing between agencies to combat underground economic
 activity;
- Consider province-wide campaigns to raise public awareness of the negative impact of the underground economy in the home renovation industry.

MOVED: Chuck McShane SECONDED: Rick Martins

CARRIED

RESOLUTION # 2 (External)

Submitted to: Ministry of Municipal Affairs and Housing

Submitted by: OHBA Executive Committee

Date: September 22, 2011

<u>Subject:</u> Development Charges Act

Whereas: Ontario and municipalities continue to experience an infrastructure deficit; and

Whereas: The Province of Ontario has increased fiscal support for the expansion and maintenance of core infrastructure and made significant investments in municipal transit systems; and

Whereas: A number of Ontario municipalities are planning to construct higher-order transit lines that have shared funding agreements with the provincial government (in some cases federal contributions also apply). Nonetheless, significant municipal financial contributions to fund the transit lines will be required; and

Whereas: The Development Charges Act as it relates to transit funding must not include an increase that would result in the level of service exceeding the average level of that service provided in the municipality over the 10-year period immediately preceding the preparation of the background study. Furthermore, the increase in the need for service must be reduced by the extent to which an increase in service to meet the increased need would benefit existing development; and

Whereas: Funding the municipal transit expansion contributions through development charges without allocating a significant share of the cost burden across the broader tax base is an inequitable financing solution that requires a small portion of the population (new home buyers) to fund infrastructure that has broad community benefits; and

Whereas: The Provincial Municipal Fiscal and Service Delivery Review (PMFSDR) released in fall 2008 is an agreement between the Province of Ontario, AMO and the city of Toronto that uploads a number of services (Ontario Disability Support Program, Ontario Drug Benefit, Ontario Works Benefits and a portion of court security), therefore providing significant additional fiscal capacity for municipalities to invest in core infrastructure. For the year 2011, the estimated net benefit of the uploads is \$947 million, which will rise to \$1.5 billion a year by 2018; and

Whereas: The provincial government increased the capacity of municipal governments to invest in core infrastructure through sharing two cents per litre from gas tax revenues with municipalities for long-term, sustainable support for new transit equipment, fleet maintenance and expanded operations. A total of 89 Ontario transit systems, serving 111 municipalities receive provincial gas tax funding totaling over \$300 million on an annual basis; and

Whereas: The federal Gas Tax Fund (GTF), a key component of the *Building Canada* infrastructure plan, is helping to build Canada's communities by providing predictable and long-term funding in support of municipal infrastructure. From 2007-08 to 2013-14, municipalities will receive a total of \$11.8 billion in gas tax funding.

Therefore be it resolved that: The provincial government consider expanding the successful gas tax program through an additional phase in of 3 cents per litre of the **existing** gas tax as economic conditions improve and the provincial deficit is reduced; and

Therefore be it further resolved that: with the PMFSDR uploads and increasing existing gas tax allocations from the provincial and federal governments to provide core infrastructure funding it would be inappropriate and inequitable to increase government imposed charges on new home buyers through an elimination the 10-year service average provision from the *Development Charges Act*.

MOVED: James Bazely SECONDED: Diane Murray

CARRIED

RESOLUTION #3 (External)

<u>Submitted to:</u> Ministry of Training, Colleges and Universities

Ontario College of Trades

<u>Submitted by:</u> OHBA Training and Education Committee

<u>Date:</u> September 22, 2011

<u>Subject:</u> Journeyperson-to-Apprenticeship Ratio

Whereas: OHBA is concerned about the future labour supply for skilled trades; and

Whereas: a career in construction should be promoted as a viable option for people when choosing a career; and

Whereas: as part of the accreditation process for some trades there is an apprenticeship component where the worker must be trained on-the-job alongside fully accredited journeypersons; and

Whereas: the current journeyperson-to-apprentice ratio does not provide opportunities and creates a barrier to entry for new apprentices; and

Whereas: many construction employers in Ontario have found it difficult to hire apprentices to train because of the restrictive ratio regime thereby limiting the opportunities for young people; and

Whereas: the ratio model is especially prohibitive outside the Greater Toronto Area, where smaller-sized firms make the ability to train apprentices difficult for employers; and

Whereas: the majority of provinces have a 1:1 journeyperson-to-apprenticeship ratio for most skilled trades; and

Whereas: amending the ratio requirements to 1:1 would open up thousands of new apprenticeship opportunities; and

Whereas: the **Ontario College of Trades and Apprenticeship Act, 2009** allows for a review of the journeyperson-to-apprenticeship ratio through Part 9 of the legislation; and

Whereas: The Minister of Training, Colleges and Universities also has the authority under the **Trades Qualification and Apprenticeship Act, 1990** to prescribe the journeyperson-to-apprentice ratio through a change in regulation;

Therefore be it resolved that: the Ministry of Training, Colleges and Universities and/or the College of Trades move to change the journeyperson-to-apprentice ratio in skilled trades to 1:1.

MOVED: Rick Martins SECONDED: Shellie Chowns

CARRIED









"The Residential
Construction Industry
is the Engine that
Drives Ontario's Economy"

29 LOCAL ASSOCIATIONS

BILD Brantford Chatham-Kent **Greater Dufferin Durham Region** Grey-Bruce **Guelph & District** Haldimand-Norfolk **Haliburton County** Hamilton-Halton Kingston-Frontenac Lanark-Leeds London Niagara North Bay & District Greater Ottawa Peterborough & the Kawarthas Quinte Renfrew County Sarnia-Lambton Saugeen Country Seaway Valley Simcoe County St. Thomas-Elgin Stratford & Area Sudbury & District Thunder Bay Waterloo Region **Greater Windsor**



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