



June 11, 2018

Honorable Amarjeet Sohi,  
Minister of Infrastructure and Communities  
Transmitted via email: Amarjeet.Sohi@canada.ca

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Dear Minister Sohi:

RE: Bill C-344 Community Benefit

The Alberta Construction Association wishes to advise you of our members concern with Private Members Bill C-344 (An Act to Amend the Department of Public Works and Government Services Act – Community Benefit). Bill C-344 defines community benefits to mean:

*"a social, economic, or environmental benefit that a community derives from a construction, maintenance or repair project, and includes job creation and training opportunities, improvement of public space and any other specific benefit identified by the community"*

The Bill provides the Minister the power to require bidders to provide information on the community benefits derived from the project, prior to awarding the contract. The sponsor of the Bill clearly stated in his June 9, 2017 introduction of the Bill that this Bill would enable the establishment of Community Benefit Agreements:

*"CBAs would enable the ministry of public services and procurement to formulate agreements with federal infrastructure developers with added input from community groups. These agreements would lay the foundation to encourage local communities to build partnerships with developers. Ultimately, CBAs would strengthen the socio-economic influence of publicly funded development projects."*

ACA represents over 3000 member firms, each contributing to the economic well-being of Canadians through the structures they build. Over 240,000 Albertans, one in nine working Albertans, are employed in the construction industry. With 10% of Canada's population, Alberta trains 20% of Canada's apprentices.

ACA is opposed to using the procurement of construction services to advance unrelated community benefits and other public policy objectives where they jeopardize the integrity of the competitive bid system (ACA Public Policy 4.2, developed and endorsed by our members).

ACA opposes procurement practices in which bids are subjectively evaluated on the basis of provision of goods and services not specified in the original tender. This lack of transparency violates the principle of fairness of selecting the lowest priced evaluated compliant bid. As goods and services cannot be provided for free, such procurement practices in fact use up scarce capital resources for other purposes. Further, such practices invite perceptions of unfair insider information of bidders and of potential corruption of procurers.

ACA urges that all Members of Parliament reconsider the need for this Bill.



Sincerely,

A handwritten signature in blue ink that reads "Paul Heyens".

Paul Heyens, Chairman

cc. Canadian Construction Association, Edmonton Construction Association