



18 May, 2021

Mansoor Mahmood, Director
Building and Development Branch
Ministry of Municipal Affairs and Housing

Delivered via email to mansoor.mahmood@ontario.ca

Dear Mr. Mahmood,

We are writing in follow up to the stakeholder discussions held related to the Building Code Transformation Services proposal.

As primary stakeholders we appreciate the opportunity to remain engaged in discussions with the Ministry directly following the fall 2019 initial consultations. The sessions allowed for preliminary information on the model to be presented and more importantly, it provided the industry with the opportunity to give feedback and insights specific to key components of the model.

We have met separately following the last session to discuss and assess various components of the proposed model. As the associations whose members represent the various user groups for Building Code Services, this model has the potential to impact those users and the public they serve, which we believe should be considered carefully.

While we understand the stakeholder consultations are considered complete, we continue to have questions and concerns regarding several elements of the proposal, and while much work has been done by the Ministry to date, it is clear that there is still work ahead in the form of additional discussions and considerations needed to develop the best approach. While the Ministry believes the establishment of an Administrative Authority is a viable option, we are not convinced the proposal as presented in its entirety is the best approach forward.

The expertise we bring to the table in our respective fields can assist you with identifying the best solutions to address the various issues which currently exist. As stakeholder associations, we deploy strategies and best practices related to running efficient, accountable organizations.

We strongly recommend the Ministry take additional time to consider all viable options and consult further with industry partners before it moves forward. We continue to be a resource to government and would like to regroup with the Ministry to further the discussions.

We look forward to hearing from you.

Sincerely,

Association of Architectural Technologists of Ontario (AATO)
Association of Registered Interior Designers of Ontario (ARIDO)
Ontario Association of Architects (OAA)
Ontario Association of Certified Engineering Technicians and Technologists (OACETT)
Ontario Home Builders Association (OHBA)
Ontario Society of Professional Engineers (OSPE)
Residential Construction Council of Ontario (RESCON)