



Ontario Association of Architects

March 20, 2019

Jason Ferrigan, RPP
President
Ontario Professional Planners Institute

[sent via email]

Dear Jason,

As the professional regulator for architecture in Ontario, the OAA's primary mandate and focus is the protection of the public interest.

The OAA has taken significant time to review and consider Bill 70, and its predecessor Bill 122. For the reasons outlined below, the OAA asks that architects, as licensed and regulated professionals, continue to be able to refer to themselves as a professional planner and/or urbanist. This can be accomplished either by removing both terms from the proposed legislation and retaining the current protected titles, or through an explicit exemption for OAA members.

In reviewing this position in light of Bill 70, the key OAA consideration is whether members of the public will be protected if OAA members continue to refer to their work as professional planning services or to themselves as professional planners. Having considered this, we want to reinforce that whenever architects provide planning services, they are doing so as licensed professionals, governed and regulated by the OAA under the *Architects Act*. We also want to ensure that it is understood that Bill 70 is articulating that the practice of professional planning includes services that are usual and customary to those of an architect. Many architects have specifically focused education in the area of urban design and planning, and offer those services directly to the public.

We recognize that Bill 70 did attempt to resolve some of our regulatory concerns via Section 2 ("rights not affected"). However, Sections 20, 24 and 25 work to undermine the efficacy of this section. As a result, Section 2 proves insufficient to ensure that architects continue to be able to practise unfettered in the field of *professional* planning, and to refer to themselves—as licensed and regulated professionals—as *professional* planners while performing such work.

As we are confident that the public is already protected through the current regulatory regime (and trust that you agree), appropriate exemptions must be integrated into the legislation for our members. We welcome the OPPI proposing a specific legislative amendment that explicitly accomplishes this requirement.

We would also appreciate a written affirmation that the OPPI does not, in any way, intend for this legislation to prohibit or otherwise interfere with the ability of OAA members to practise architecture and to provide professional planning services.

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Upon addressing these concerns, we believe the proposed legislation can provide a benefit to the public in helping them ascertain when a professional (be it an architect or planner) is practising professional planning, as opposed to an otherwise less-qualified or unqualified member of the general public.

Sincerely,



Kathleen Kurtin, Architect
OAA, MRAIC
President

Cc: Mary Ann Rangam, Executive Director OPPI

