



AMO's Submission to Proposed *Building Code Act, 1992* Change for Unorganized Territories, Proposed Amendments to Freeze All Building Code Fees and Future Enhancements to the Qualification Program for Ontario's Building Practitioners

Comments to the Ministry of Municipal Affairs and Housing on ERO 019-6847, Ontario's Regulatory Registry on O. Reg 332/12, and Future Enhancements to the Qualification Program for Ontario's Building Practitioners

May 3, 2023

Introduction

AMO is pleased to be able to submit comments regarding the Ministry's current proposals and to commend your government on the ongoing commitment to address a shortage of building practitioners across the province.

ERO 019-6847 (Proposed Building Code Act, 1992 Change for Unorganized Territories)

AMO is aware of concerns in Northern Ontario regarding an increased interest in development on property in unincorporated areas of Ontario. This proposal is responsive in that it acknowledges the challenges associated with these developments but will require an appropriate framework to provide greater oversight and accountability to built form in unincorporated territory. As far as we are aware, there is not much beyond the parcel fabric to enforce in unincorporated territory, posing unique challenges not felt elsewhere and driving the explosion of demand in growth in these areas.

The impact of these creative housing solutions in unincorporated territory are felt most in the municipal jurisdictions directly adjacent to unincorporated territory. Source water protection concerns and demands for emergency services are just two examples of direct impacts. We are pleased to see that this unique situation has garnered the attention of the province.

AMO sees this as an opportunity to look at the broader challenges faced by municipalities with similar developments adjacent to their communities. We encourage the province to consider a broader conversation about Northern housing development, including the ongoing interest in having more crown land available for development within municipal jurisdictions. This could help address the demand for more housing options in Northern Ontario that may be driving the explosion of development in unincorporated territory.

O. Reg 332/12 (Proposed Amendments to freeze all Building Code fees)

AMO is supportive of this initiative and is pleased to see this proposal as another example of the government's commitment to addressing this complex problem from a variety of angles. That said, AMO understands that the elimination of fees will not have a huge impact on housing prices across the province. The fees for individual municipal building practitioners are largely paid by the municipality to the province, but the overall impact is minimal.

Future Enhancements to the Qualification Program for Ontario's Building Practitioners

AMO appreciates all the work that the Ministry has done and is continuing to do to address the sector's concerns regarding the lack of qualified building officials. We continue to hear concerns that well-paying building official jobs are going unfilled across the province. The ability to attain the province's goal of building 1.5 million homes by 2031 cannot be achieved without meeting this key staffing challenge and we are hopeful that this ongoing work will help fill this gap.

It is important to balance the need to get more trained people working quickly and the public safety component of the building official role. These individuals are involved in the entire process from reviewing designs to inspecting buildings before final occupancy and are a key player in the municipal role in meeting provincial housing targets.

AMO wants to help solve these problems in simple, practical and collaborative ways with key partners, including the Ontario Building Officials Association, the Ontario Large Municipalities Chief Building Officials and the Ministry.

There are two tangible ways to make some early impact on this work. AMO wants to work with ministry staff to release guidance on the building practitioner internship program. This would help dispel myths and encourage municipalities to see the internship program as an option to upskill the existing workforce and/or support growth of new staff.

In addition to addressing the lack of qualified building practitioners, AMO would like to help support efforts to free up capacity on the ground with the existing workforce to make meaningful progress towards our mutually beneficial goals. To do this, AMO recommends that the Administrative Monetary Penalties framework under section 18.1 of the *Building Code Act* be proclaimed immediately as an interim step to open capacity as the Ministry look towards the longer-term goals.

Conclusion

AMO is pleased to have had the opportunity to provide comments and we look forward to continued collaboration to bring about the transformational change needed to build 1.5 million homes by 2031.