

July 15, 2016

The Honourable Bill Mauro
Minister of Municipal Affairs
17th Floor - 777 Bay St
Toronto ON M5G 2E5

Dear Minister Mauro:

We are writing on behalf of several allied organizations including the Association of Registered Interior Designers of Ontario (ARIDO), the Ontario Building Officials Association (OBOA), the Large Municipalities Chief Building Officials (LMCBO), and the Ontario Association of Architects (OAA) to congratulate you on your appointment as the Minister of Municipal Affairs. We appreciate the Ministry's continuing commitment to ensuring the safety of the built environment for Ontarians through oversight of the Ontario Building Code (OBC) and most recently, actions taken to address recommendations arising out of the Elliot Lake Commission of Inquiry. We hope to continue the long and constructive relationship between the Ministry and our organizations.

You can be assured our respective organizations take the responsibility to ensure building safety seriously. This submission is unified and we feel strongly that we advance our concerns collectively in order to promote the best outcomes for Ontarians. We remain highly concerned with the void left within the OBC by the removal of professional design requirements. Our experience suggests a potential impact on the safety of the built environment.

The removal of professional design requirements from the OBC has been an issue of concern to our organizations for some time. The ARIDO, OBOA, LMCBO and OAA continue to support the inclusion of the requirements for professional design within the OBC, or at the very least as an appendix to the Code. For years, the inclusion of professional design requirements in the OBC provided an easily accessible tool for building officials to use to ensure the safety of the built environment as well as a critical resource for other users of the Code and the public. We have individually brought this matter to the attention of your predecessors. Assuming this issue has yet to be rectified; we are collectively bringing it to your attention to highlight the importance of this issue and are requesting the return of what has been historically referred to as "the table" and its accompanying notes into the OBC.

The inclusion of the table within the OBC adds value to the Code as it reduces any confusion that might exist as to whether an architect and/or engineer is required for work on a specific building and allows for more accurate, consistent application of the OBC. In addition, the table includes critical notes which clarify the exemption which exists under the *Architects Act* relative to design services that can be performed within the interior of certain building by other design professionals.

As you are aware the *Architects Act* and the *Professional Engineers Act* govern the practice of architecture and practice of engineering respectively. The table is a clear re-iteration of what exists within these two pieces of legislation along with some critical notes of clarification including the provision of interior design services within large buildings. The table would return to building officials a clear and convenient tool to enable them to effectively perform their duties.

The ARIDO, OBOA, LMCBO and OAA note that the return of professional design requirements in the OBC only serves to support - not confuse - the application of existing legislation including the *Architects Act* and the *Professional Engineers Act*. Providing this information in the regulation most used by all parties across the spectrum (the OBC) is a logical and obvious step. All Ontarians benefit from consistent application of legislation pertaining to the built environment, including those Ontarians who are Architects, Engineers, Interior Designers and Building Officials.

The reintegration of professional design requirements into the OBC should also help to alleviate some of the strain felt by municipalities. Building Officials from across the province continue to contact the OAA with questions of clarity about professional design requirements, specifically with respect to design services that can be provided within the interiors of large buildings as noted above. ARIDO members continue to be questioned on their qualifications to design due to the lack of clarity on this interior designer exemption. This is inefficient and costly.

By reintroducing the previously cited table to the OBC (or as an appendix), the Government can return the process that was in place and offered an efficient and effective way of communicating designer limitations, saving municipalities time and money in enforcing the OBC.

With the aligned support of many professions working within the built environment and the Government's commitment in the 2014 Budget to *Strengthen Building Safety*, specifically to "clarify that only qualified designers and design professional can design certain types of buildings in Ontario," we feel reintegrating professional design requirements into the OBC will quickly fulfill this commitment to the people of Ontario.

With near unanimous support from the industry, we urge you to adopt our recommendation.

Sincerely,



Toon Dreessen, President
Ontario Association of Architects (OAA)



Lynn McGregor, President
Association of Registered Interior Designers
of Ontario (ARIDO)



Ralph Kaminski
Large Municipalities Chief Building
Officials (LMCBO)



Alan Shaw, President
Ontario Building Officials Association
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cc. George Comrie, President of Professional Engineers of Ontario (PEO)