

Established in 1889, the Ontario Association of Architects (OAA) is the self-regulating body for the province's architecture profession. It governs the practice of architecture and administers the Architects Act in order to serve and protect the public interest.

Standing Committee on Finance and Economic Affairs
Whitney Block, Room 1405
99 Wellesley Street West
Toronto, Ontario
M7A 1A2

May 13, 2025

Re: Bill 2, *Protect Ontario Through Free Trade Within Canada Act, 2025*

Dear Chair and Members of the Standing Committee,

The Ontario Association of Architects (OAA) supports the introduction of Bill 2, *Protect Ontario Through Free Trade Within Canada Act, 2025*, in principle. The Association believes Canadian jurisdictions should work together to facilitate free trade and labour mobility nationally.

Since 1992, a national reciprocity agreement has been in place to ensure the labour mobility of Canadian Architects across the country. Updated most recently in 2015, the [Canadian Reciprocity Agreement](#) recognizes the professional accreditation of Architects across domestic jurisdictions, streamlining processes of registration and licensing. Being one of the first regulated professions to initiate this type of reciprocity agreement in Canada, the architecture profession is recognized as a national leader in labour mobility.

Under this agreement, each of the 11 [Regulatory Organizations of Architecture in Canada](#) (ROAC) agree to license as an Architect, in their respective province or territory, any Architect holding such a licence in another province or territory.

The OAA has had the opportunity to take a close look at Bill 2. The Association submits the following observations to ensure free trade and labour mobility do not impact the protection of public safety entrusted to professional regulators, including the OAA as it relates to the practice of architecture in Ontario.

Schedule 2: FARPACTA

The OAA believes Bill 2 is intended to eliminate unnecessary barriers and get professionals working and/or offering services to the public as quickly as possible across the country. The Association consistently meets the timelines set by *Fair Access to Regulated Professions and Compulsory Trades Act, 2006* (FARPACTA) regarding registration decisions for domestic labour mobility applicants. For the [2023 reporting year](#), the OAA made decisions on all 49 domestic labour applications it received within 30 days; all applicants were successfully granted full registration.

The OAA appreciates the proposed consideration provided to a regulated profession under FARPACTA by Section 10(1) under the *Ontario Labour Mobility Act, 2009*. Notwithstanding this provision and given the longstanding reciprocity agreement for



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Architects in Canada, the OAA is confident its registration practices will achieve compliance with the proposed timelines for decisions, responses, and reasons.

Schedule 5: *Ontario Free Trade and Labour Mobility Act, 2025*

The OAA applauds government for the introduction of the *Ontario Free Trade and Labour Mobility Act*. As the section on Mutual Recognition is currently written, a domestic labour mobility applicant is entitled to be issued a licence if:

- they hold an equivalent authorization issued by an authorizing body of a reciprocating jurisdiction; and
- they are in good standing with that authorizing body.

Once licensed, the person is subject to any laws applicable to providers of the service in Ontario. Therefore, this schedule contemplates that regulators can require domestic labour mobility applicants to satisfy any requirements that may be imposed by a regulatory authority.

The OAA strongly urges government to pass this Schedule as currently written to allow regulators entrusted with protecting the public interest to continue to carry out their regulatory duties.

Schedule 6: *Ontario Labour Mobility Act, 2009*

Schedule 6 contemplates the creation of a new Section—10.1 Deemed Certification, Individual Certified Out-of-Province—in the *Ontario Labour Mobility Act, 2009*. If passed as it is currently written, "deemed certification" creates a formalized "as-of-right" system where prescribed regulated professionals from other Canadian jurisdictions can come to Ontario and be deemed certified for a one-time six-month period. To do so, professionals must provide their out-of-province authorizing certificate and meet other prescribed requirements.

If Architects are included within the "prescribed regulated professionals" of the regulations, this proposed Section may create a conflict with the *Architects Act*. Under the *Architects Act* and its General Regulation 27, no person shall engage in the practice of architecture or hold themselves out as engaging in the practice of architecture unless they are the holder of a licence under the *Architects Act*. Moreover, to provide services to the public, an Architect must be the holder of an OAA certificate of practice (CoP), which comes with public protection requirements of its own, including professional liability insurance and a professional seal issued by the Association. Once the regulations related to Deemed Certification are made available, the Association is ready to work alongside government to ensure harmony between the *Ontario Labour Mobility Act* and the regulation of the practice of architecture in Ontario.

The OAA enjoys a longstanding, collaborative relationship with government. On behalf of the Association, and the architecture profession and the wider Ontario public, I look forward to the opportunity to work alongside this Committee and all of government to protect the public interest.



Should you have any questions or require clarification, or would like to continue this dialogue, please do not hesitate to reach out to me.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Wilson", is written over a light yellow rectangular background.

Ted Wilson, Architect, OAA
President