

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.

Hon. Doug Downey, Attorney General
Ministry of the Attorney General
McMurtry-Scott Building
11th Floor, 720 Bay Street
Toronto, Ontario
M7A 2S9

April 7, 2025

Re: Nova Scotia Bill 36 Reciprocal Legislation

Dear Minister,

The Ontario Association of Architects (OAA) has been closely monitoring Nova Scotia's Bill 36, *Free Trade and Mobility within Canada Act, 2025*. Intending to remove barriers to trade and investment between Nova Scotia and other reciprocal provinces and territories, this legislation prevails over all other statutes where there is a conflict.

During the Second Reading debate of Bill 36, Nova Scotia Premier Tim Houston mentioned he had previously discussed this legislation with leadership in Ontario. In fact, Premier Houston noted that when he pitched this idea to Premier Doug Ford, the latter's response was "Count me in. Count me in."

The OAA supports the introduction of reciprocal legislation in Ontario. The Association believes Canadian jurisdictions should work together to facilitate free trade and labour mobility nationally. It will be important, however, to ensure free trade and labour mobility does not impact the protection of public safety that has been entrusted to professional regulators, including the OAA as it relates to the practice of architecture in Ontario.

In anticipation of reciprocal legislation for Ontario, the OAA welcomes the opportunity to consult with government. It urges contemplation of legislation that does not impede the Association's ability to:

- continue to protect the public interest when there are Architects in Ontario who are providing services to the public;
- continue to advance consumer protection through complaints and discipline processes when there are Architects in Ontario who are providing services to the public;
- ensure Ontario rules and regulations pertaining to building and construction are complied with; and
- manage differences in standards of practice and definitions of professional misconduct.

Alternately, government could consider exempting Architects from this legislation as the profession already enjoys longstanding reciprocity across Canada.

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, this agreement recognizes the professional accreditation of licensed Architects and streamlines processes of registration and licensing for Architects from other



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Canadian jurisdictions. 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, the 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, who meets the other conditions contained in this agreement.

To obtain a licence as an Architect in another jurisdiction in Canada under the terms of this Reciprocity Agreement, the Architect must:

- complete and submit to the Licensing Authority a written request;
- have sufficient knowledge of the laws governing the profession of architecture in the province/territory in which the application is being made, and comply with these laws; and
- pay the required fees.

During these times of great uncertainty, the OAA believes Canadian jurisdictions should work together to facilitate free trade and labour mobility nationally. Ontario and Canada are uniquely positioned to send a strong message to their North American and global partners: that the country is united in protecting the interests of all Canadians.

The Association stands ready to continue its work alongside you and your Ministry to advance the public interest.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ted Wilson', with a stylized flourish at the end.

Ted Wilson, Architect, OAA
President