

Tuesday December 3, 2024

To:  
Minister Paul Calandra  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th floor  
Toronto, Ontario  
M7A 2J3

**Re:** Amendments to O. Reg 332/12 and O. Reg 163/24, the Building Official Equivalency Assessment

Dear Minister Calandra,

On behalf of the Ontario Building Officials Association (OBOA), see below our comments regarding amendments to O. Reg 332/12 and O. Reg 163/24, the Building Official Equivalency Assessment proposed, filed with the Environmental Registry of Ontario posting 019-9327.

As a self-governing, not-for-profit organization with a long-standing commitment to establishing and maintaining high professional standards in building code administration, the OBOA supports the continued professionalization of the building official profession in Ontario.

While the OBOA encourages the concept of an Equivalency Assessment for the building official profession, we have significant concerns that the current proposal is too narrowly focused on a specific municipality and adds significant red tape and hurdles to an already burdened industry. Instead, the OBOA is strongly in favor of establishing a *national certification program* that aligns building code education and training across Canada

We strongly encourage the Government of Ontario to consider that while their goal is to reduce red tape and increase workforce capacity, the current approach is creating additional delays in the hiring process. The OBOA has outlined examples of red tape below, which will have unintended consequences for the sector at large.

### **Thirty Day Assessment Period**

The 30-day assessment period adds significant wait time to an already slow process. With municipalities taking 6-8 weeks just to post and interview candidates, this new requirement only worsens the delays, adding more time to the processing of building permits. Builders, who already face complaints about lengthy procedures, are now faced with even more barriers in hiring.

### **Equivalency**

There is the critical question of whether candidates must secure an equivalency before applying for a municipal job. If so, this would further complicate the hiring process and discourage municipalities from hiring the best candidate, as frustration with the extended process could lead candidates to seek opportunities elsewhere.



905-264-1662



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8-200 Marycroft Ave.  
Woodbridge, ON L4L 5X4

The time and cost associated with obtaining transcripts and certifications would deter qualified individuals from applying, thereby delaying the hiring process even more. If the objective is to expedite the hiring of qualified individuals, this approach is failing to achieve that goal.

### **Ministry Review**

MMAH staff have acknowledge that they are already operating at full capacity, and by adding additional responsibilities, we can expect further delays in reviewing the process. The mention of potentially seeking outside counsel for assistance adds both time and cost to the process and raises concerns about the department's ability to effectively assess applicants' qualifications in-house.

### **Lack of Defined Timeline**

The lack of a defined timeline for the request process introduces even more uncertainty, further extending the overall time required for assessment. This lack of clarity only adds to the inefficiency of the system and should be addressed to streamline the process.

### **Recommendations:**

While the OBOA encourages the concept of an Equivalency Assessment for Building Officials, we have significant concerns that the current proposal is too narrowly focused on a specific municipality, particularly within Northern Ontario. The OBOA strongly believes that if such an assessment is to be implemented, it must be consistent across all municipalities in Ontario and should not be restricted to an undefined Northern Ontario limitation. OBOA proposes expanding the program to allow Building Officials from other provinces and territories within Canada to be eligible for participation, providing a level playing field for Building Officials across Canada.

**National Certification Program:** OBOA is strongly in favor of establishing a national certification program that aligns building code education and training across Canada. A national certification program, like the Alliance of Canadian Building Officials Association (ACBOA) certification program, would help streamline the recognition of Building Officials' qualifications across provinces and territories, fostering professional mobility and consistency. This approach could eventually eliminate the need for Ontario-specific BCIN qualifications, enabling a more standardized system where Building Inspectors are represented across the country. This would also contribute to assisting the red tape issues and hiring delays.

**Align with the OBOA Internship Program:** OBOA would like to reiterate to the Ministry that, in collaboration with MMAH, we recently approved amendments to the Internship Program that allow individuals with limited qualifications to practice as a Building Official under the supervision of a Qualified Building Official. This program, which requires successful completion of the Legal Exam, mirrors many aspects of the Equivalency Assessment proposal. However, the Internship Program also requires individuals to complete an additional MMAH exam under the Building Code Act (BCA) Section 15.11 (1), (2), and (3). If a national certification program is not feasible, OBOA recommends aligning the proposed program with the OBOA Internship Program. This alignment would provide a structured, standardized pathway for individuals to gain the necessary qualifications.



**Reasonable Limitation Period:** If this Equivalency Assessment program is implemented, the OBOA would request that there is a reasonable limitation period implemented to achieve the required Ontario BCIN Qualifications, which would allow that person to transition to another Municipality upon their successful completion of the MMAH's exams. By introducing a reasonable timeframe for qualification, the individual would be able to attain the necessary credentials quicker, facilitating a smoother and more efficient transition into their new role. This defined timeline would not only enhance the professional development of building officials but also promote a level playing field, ensuring that all candidates have a clear and equitable opportunity to meet the required standards within a defined period. Additionally, setting a reasonable limitation period would help reduce delays in hiring, as municipalities would have a more predictable timeline for when a qualified individual could assume their position. This would streamline the recruitment process, support the timely filling of vacancies, and ultimately contribute to better service delivery within the building and construction sector. By implementing such a policy, municipalities can benefit from a pool of well-qualified and timely-trained building officials, while ensuring that candidates are given fair and sufficient opportunity to meet the qualification requirements.

To conclude, while OBOA acknowledges the importance of an Equivalency Assessment, the current proposal, as outlined, does not adequately address the pressing issues faced by municipalities as it has potential to create additional red tape and unintended consequences for our industry. OBOA expresses concerns that the proposed Equivalency Assessment proposal will create more red tape and potentially diminish the importance of the BCIN Qualifications requirements that the MMAH has required from Building Officials since 2006. As the Provincial BCIN Qualification are geared to the area of practice for the individual person/municipality, with the current Internship program, the OBOA is of the opinion that ERO 019-9327 duplicates provisions which are already in place and available. OBOA recommends several critical changes including: the establishment of a national certification program to streamline the recognition of building official qualifications across Canada, similar to that of ACBOA. If not feasible, OBOA recommends that the alignment of the Equivalency Assessment with the OBOA Internship Program to provide a clearer and more standardized pathway. In addition, we are suggesting implementing a reasonable limitation period to expedite qualification timelines and reduce delays in hiring.

The OBOA remains committed to working with the Ministry and all stakeholders to create a system that enhances the professional standing of building officials while ensuring that municipalities have access to the skilled professionals, they need to support the safe and effective administration of the Ontario Building Code.

Thank you for the opportunity to submit our comments and recommendations. If you have any questions, we encourage you to please reach out to the OBOA's CEO, Lawrence Wagner at [ceo@oboa.on.ca](mailto:ceo@oboa.on.ca).

Sincerely,



**Andy Jones, C.B.C.O**  
President  
Ontario Building Officials Association (OBOA)



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