



Ontario
Home Builders'
Association

December 4, 2024

Ministry of Municipal Affairs and Housing
Building & Development Branch
777 Bay Street, 12th floor
Toronto, ON
M7A 2J3

Re: Proposal No. 24-MMAH021 – Proposal to Establish a Building Official Equivalency Assessment Process (O. Reg 332/12 and O. Reg 163/24)

The Ontario Home Builders' Association

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario, representing 4,000 member companies organized into 28 local associations across the province, from Niagara to Thunder Bay and Windsor to Ottawa. Members include builders, developers, professional renovators, trade contractors, suppliers, and manufacturers serving the residential construction industry. The residential construction industry employed over 550,000 people, paying \$38.8 billion in wages, and contributed over \$83.8 billion in investment value across Ontario in 2023.

Please accept the below as our submission to the government's request for feedback on a proposal for establishing a building official equivalency assessment process, which is being submitted on behalf of OHBA and its 28 local associations including but not limited to the Building and Land Development Association (BILD), West End Home Builders' Association (WE HBA), Greater Ottawa Home Builders' Association (GO HBA), and London Home Builders' Association (LHBA).

Background

The Ministry of Municipal Affairs and Housing is consulting on a proposed regulation that outlines a proposed Building Official Equivalency Assessment process designed to address municipal staffing challenges by facilitating the recruitment of qualified building officials from outside Ontario. This initiative aims to ensure municipalities have the capacity to meet local enforcement needs and support housing construction timelines. The proposed assessment process would evaluate whether an applicant's knowledge of the Ontario Building Code (OBC) meets the ministry's technical exam standards. Additionally, all applicants would be required to pass a Building Code legal exam to demonstrate their understanding of Ontario's legislative and regulatory framework.

The proposal addresses the challenges faced by municipalities like Kenora, which have encountered barriers when attempting to recruit building officials from neighboring provinces such as Manitoba, due to differing qualification requirements. By streamlining equivalency assessments and addressing labour mobility barriers, the initiative seeks to support Ontario's housing supply goals while maintaining public safety. The effort is part of Ontario's broader strategy to reduce red tape and improve regulatory processes in alignment with the proposed Cutting Red Tape, Building Ontario Act, 2024.

OHBA Response

OHBA supports initiatives aimed at addressing labour shortages within the building official profession, recognizing their critical role in advancing Ontario's housing supply goals. However, while the Equivalency Assessment framework is a positive step, OHBA shares concerns with our industry partners at the Ontario Building Officials Association (OBOA) that the current proposal is too narrowly focused, potentially adding unnecessary complexity and delays to the hiring process. A broader, more inclusive approach is needed to address workforce challenges impacting the entire building industry.

OHBA strongly advocates for a more streamlined process and encourages government to refine the proposal through further stakeholder consultation, ensuring that the framework effectively supports housing construction and delivers practical, scalable solutions to Ontario's housing needs.

Proposed Contents

By implementing the following changes, OHBA believes the proposal will better align with Ontario's housing and workforce priorities, addressing the broader needs of the building sector while reducing the potential impact on approval timelines:

Utilizing a National Standard for Building Officials

OHBA supports the OBOA's proposal to consider the need for a national standard for building officials, with equivalency assessments designed to align with other provincial and territorial requirements. This would streamline certification processes and reduce labour mobility barriers across jurisdictions. We are supportive of the removal of barriers to support cross-provincial work, but the government will need to work collectively with our other provincial partners to determine the best way to achieve that and address key factors like administrative consideration and differences between provincial building codes, among others.

Reducing Administrative Burden and Avoiding Delays

OHBA suggests revision of the language to ensure that the assessment process minimizes administrative burden. For example:

- Clearly outline the criteria for equivalency in the draft.
- Specify timelines for application review and decision-making to avoid unnecessary delays.

Addressing Pathways for Continuous Training and Upskilling

OHBA also suggests language revisions to incorporate pathways for building officials to access Ontario-specific training and upskilling opportunities, ensuring a smooth transition for out-of-province professionals.

Conclusion

OHBA appreciates the opportunity to provide feedback on the proposed Building Official Equivalency Assessment framework. While we recognize the importance of addressing workforce shortages and streamlining recruitment processes, it is essential that this framework be inclusive, efficient, and aligned with broader industry needs. By considering our feedback, the government can enhance workforce capacity while reducing delays and barriers to housing supply. OHBA remains committed to working collaboratively with stakeholders and the Government of Ontario to develop practical, scalable solutions that support the province's ambitious housing supply goals and foster a thriving residential construction sector.