



Hon. Minister Steve Clark
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto ON
M5G 2E5

November 25th, 2019

RE: Proposed Amendments to Ontario's Building Code Services

Dear Minister Clark,

AMCTO would like to address the proposed amendments to Ontario's Building Code Services. As you know, AMCTO is the largest voluntary association of local government professionals in Ontario, representing almost 2,200 members working in management and leadership.

In that vein, AMCTO is concerned by the proposed creation of the administrative authority and its wider financial implications for Ontario's municipalities. More specifically, we believe the authority would:

- Increase the administrative burden on municipal staff: Municipal clerks and treasurers would be responsible to report and remit the data and funds associated with paying the authority in turn creating a burden for the municipality;
- Potentially increase the risk of additional liability against a municipal government: In cases involving third parties with review and approvals of building permit applications, municipal governments could see increased of risk for building code negligence where joint and several liability is applied; and
- Impact local service delivery: Municipal governments currently have the authority and control to deliver services under the *Building Code Act*. With the involvement of third parties, municipalities would have diminished influence on the level of service set by the new authority.

AMCTO is seeking the Ministry's consideration on the concerns expressed above to help further inform your proposals. We are willing to provide the expertise of our membership to ensure the administrative authority is able to transform and modernize the delivery of Ontario's Building Code Services in a way that respects municipal operations and service delivery.

For any questions, clarity or follow-up, please do not hesitate to contact Rick Johal, Director of Member & Sector Relations (rjohal@amcto.com).

Yours sincerely,

Dean Sauriol, CMO, AOMC
AMCTO President