

# Removing Barriers for Qualified Building Officials

AMO'S SUBMISSION TO THE ENVIRONMENTAL REGISTRY OF ONTARIO

ERO 019-9327

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## Executive Summary

The Association of Municipalities of Ontario (AMO) is pleased to provide comments on the Environmental Registry of Ontario consultation related to reducing labour mobility barriers for the recruitment of building officials from outside Ontario.

AMO appreciates the work the Province has done and is continuing to do to address concerns regarding the shortage of qualified building inspectors. We have [previously commented](#) about the importance of filling this workforce gap, without which municipalities will not be able to effectively support the Province in building 1.5 million homes by 2031.

## Scale and Scope of Proposal

The proposed approach to establishing a Building Official Equivalency Assessment appears to be limited to building officials from Manitoba who may want to work in Ontario, and to municipalities in Northern Ontario that would hire these officials. It is unclear what the rationale for this limited scope is. To attract the widest range of qualified officials, the Province should consider allowing qualified officials from any Canadian jurisdiction to apply to an Equivalency Assessment process. Further, provincial action is needed to address building official shortages across the province.

The proposal also does not appear to include a framework to ensure that building officials become qualified through the Equivalency Assessment process stay in the northern community that initially recruited them. This could result in northern municipalities being “stepping stones”, bearing the cost to help out-of-province building officials obtain qualifications, then losing these officials to other municipalities. The Province should consider a mechanism to ensure building officials continue to practice in the north for a minimum duration, or alternatively, have the program be universal so that any municipality could recruit an out-of-province building official.

## Consideration of Expert Advice

AMO is aware that the Ontario Building Officials Association (OBOA) intends to submit comments to this consultation and encourages the Province to give considerable weight to this submission as OBOA are experts in building official training and qualification needs and will speak to the needs of the sector.