

December 3, 2025

Via email: HMA.Minister@gov.bc.ca

The Honourable Christine Boyle
Minister of Housing and Municipal Affairs
Parliament Buildings
Victoria, B.C. V8V 1X4

Re: Bill M 216 – 2025 Professional Reliance Act

Dear Minister Boyle;

I am writing to reinforce concerns other municipalities have raised about Bill M 216 – 2025 *Professional Reliance Act*, and to add additional ones that are contextual to rural and northern communities.

Allow me to express our ongoing support for the Province of B.C.'s efforts to modernize legislation that facilitates the timely development of housing in communities throughout British Columbia. The City of Quesnel has been a proactive collaborator to enable new housing development to occur throughout the city. In addition to the timely completion of our Housing Needs Assessment, the City was also the first municipality in the province to adopt policy to enable the construction of accessory dwelling units, including making available design plans, and has effectively utilized its Revitalization Tax Exemption bylaw and accessed Northern Development Initiative Trust's Northern Housing Incentive to spur the development of new units in the City.

Additionally, we want to thank the Province of B.C. for its continued partnership and investment in Quesnel, whether it be through Providence Living's proposed 288-bed long term care facility for West Quesnel, or support through BC Housing for women's transition housing, supportive housing at the Grace Inn site and shelter space. These investments are making a meaningful difference in our community.

Regarding Bill M 216 – 2025, our concerns fit within several broad categories as outlined below.

Misunderstanding of Municipal Review

There appears to be confusion in the province's supporting documents between the proposed Professional Reliance Act, the Certified Professional Program and the common practice of professional reliance.

To a large extent, smaller municipalities already rely on professionals as we do not complete a detailed review of an engineer's plans due to the lack of internal capacity. As such, municipal staff conduct only a high-level review that notes such things as whether a professional's plans meet the municipality's bylaw requirements, whether there is planned use of infrastructure materials the city does not prefer or if there is insufficient information or a lack of important



local information, among other things. It needs to be emphasized that these actions on the part of the municipality do not constitute a detailed technical review.

The Certified Professional Program refers to additional training professionals must obtain to ensure they are competent in the BC Building Code and can replace the building permit process under the Authority Having Jurisdiction. There is a significant lack of these certified professionals available in the north. The supporting documentation for the Bill lists the City of Prince George as a user of the Certified Professional Program. As far as we are aware, Prince George does not currently use this program and does not seem to be listed as a municipality under this program with the Architecture Institute of British Columbia, although it likely applies a high level of professional reliance.

Liability

It remains unclear at this time how the language within the Bill would limit or eliminate municipal liability. For example, if a professional organization ceases to operate, where would the liability for their decisions rest? As it is, municipalities are generally named as co-defendants in legal actions regarding liability. As it is, professional reports always contain a section that limits their own liability while still providing approvals, which necessitates an additional effort on the part of the municipality to ensure the organization does not completely erase accountability for its own work and approvals.

Limited Access to Professionals in the North

Quesnel, similar many other rural and remote municipalities, is experiencing an ongoing shortage of professionals located in or who are familiar with the community and its climate. We tend to see many professionals who provide reviews, approvals and reports in the community without ever being on site.

Related, this Bill would place additional pressure on professionals to take on competencies for which they do not have a scope of practice, which would necessitate further investment by the province in independent, professional regulatory oversight beyond what municipalities already do, which would result in additional costs, time and confusion.

Also, our experience has been that the quality of reports varies widely between professionals. Should this legislation proceed, we would urge the province to define the specific types of reports required for various levels of assurance. For example, the City was recently provided a technical memorandum instead of a geotechnical report for development – these are not the same and should not be relied upon as such to inform investment decisions.

An example of concern to our community is the West Quesnel Land Stability Area. In the past, municipal staff have engaged with several professionals willing to provide approved reports to support development in that area, which is fundamentally unsafe, and their reports frequently contain errors and omissions that would place undue burden on local taxpayers if the city were no longer able to intervene in the development process.



Infrastructure

The language the province has provided to support the Bill is not clear on how these changes would impact municipal discretion regarding infrastructure the municipality will or may eventually own, nor is it clear how professionals will review their reports with consideration to the municipality's growth and development goals, many of which are regulatory requirements set out by the province.

Conclusion

Finally, we are concerned that the use of registered professionals hired and paid for by a development applicant and working on their behalf creates a serious conflict of interest. While professional reliance can be a useful tool, we would remind you of the lessons learned in B.C.'s forestry sector that ultimately led to that structure being repealed to reinforce sustainable management of B.C.'s crown timber resources.

While we appreciate the haste with which the province wishes to move, notably in urban areas, we advise you to apply patience and due diligence when making changes that largely affect another order of government. The City of Quesnel was unaware of the Bill's introduction and has not had meaningful discussions with your ministry regarding it. At the same time, the market for multi-family developments, notably in urban areas, has softened, which suggests other more fundamental economic issues that need to be resolved to spur development, which should take priority over this bill.

We expect respectful treatment from the province regarding legislative changes that fit entirely within the scope of local government. We encourage you to engage with municipalities to create a more meaningful change that achieves provincial goals while safeguarding the liability placed upon local taxpayers.

Thank you for your time.

Mayor Ron Paul
City of Quesnel

Cc:

MLA Sheldon Clare
Cori Ramsay, President, Union of B.C. Municipalities
BC Municipalities