



November 4, 2015

Professional Designers Associations'

**Re: Alternative Compliance Model for Building and Accessibility Standards**

On October 8, 2015, a consultation package regarding a provincial government initiative pursuing an Alternative Compliance Model (ACM) for Building and Accessibility Standards was distributed by the Chief Building Official in the Saskatchewan Ministry of Government Relations.

The Saskatchewan Building Officials Association (SBOA) represents more than 250 dedicated and licensed building officials, and other industry professionals, including professional designers. Our objectives include: co-operating and promoting principles, and proper practices of enforcement of building standards; promoting a close relationship between building officials, building industry, government and the public; and, advancing the skills of those engaged in the application and enforcement of building and accessibility standards in Saskatchewan.

Our members are building officials, appointed by Municipalities to administer and enforce the Uniform Building and Accessibility Standards Act, and building standards.

As you consider the ACM consultation package, it will become obvious that the scope of the proposal and the information to support the proposal is incomplete. How can a local authority even consider the impact of this model without a discussion about liability? Yet this is noticeably absent from the package. The writer also indicates that this model will without doubt have the advantage of 'decreased cost of compliance' for an owner. The reader is not even asked to consider what increased cost professional design consultants may seek for the increased exposure to liability, and the increased workload that this model will likely impose.

As far as what the program itself would look like, the ACM does not allow for any objective review of plans or on-site inspections from municipal building officials. The current building code enforcement system will be obsolete where owners choose the ACM. Local authorities will have no role or say in plan review, and municipal code enforcement will not include any on-site inspections.

Our message, and our position is simply that a program that allows an owner to provide letters of assurance, with no objective third party review, inspection, and input, is quite simply a less reliable, less vigorous, less effective means of providing public safety.

We work every day with competent, ethical, professional designers. We feel we have positive relationships, and positive impacts when it comes to working with the design community. We are the objective third party review of a design. We can be the mediator between an owner and a designer, and support designers pushing for code compliance. It is our belief, and our hope, that professional designers see this as well.

For additional information, and a view of some of the other concerns and impact this model would have on Municipalities and public safety, please visit the Saskatchewan Building Officials Association website at [www.sboa.sk.ca](http://www.sboa.sk.ca).

Respectfully,

A handwritten signature in blue ink, appearing to read 'Chris Gates', is written over a light blue circular stamp.

Chris Gates, A.Sc.T, CRBO

President, Saskatchewan Building Officials Association