



City of Pitt Meadows
OFFICE OF THE MAYOR

November 26, 2025

File: 01-0400-20/25

Honourable Christine Boyle
Minister of Housing and Municipal Affairs
Email: HMA.Minister@gov.bc.ca

Dear Minister Boyle,

Re: Concerns Regarding Bill M 216 – 2025 Professional Reliance Act

On behalf of Pitt Meadows City Council, I am writing to express our concerns with Bill M 216 – 2025 Professional Reliance Act. We understand that the intent of the Bill is to streamline approvals and reduce administrative costs for development. The approach proposed in this legislation, however, is likely to have the opposite effect and create unnecessary risks to both human and environmental health.

Bill M 216 mandates that a local government must accept any submission by a certifying professional (e.g., an architect, engineer, agrologist or environmental consultant) as part of a development approval process. It also prohibits a local government from requiring a peer review of those submissions. As a result, Bill M 216 significantly reduces local government oversight over development projects. This will negatively affect public safety and create new liability for the City and, by extension, local taxpayers.

The City of Pitt Meadows, like many local governments, has been working to improve development approval processes in alignment with local and provincial housing goals, while maintaining public safety and environmental sustainability. We support improvements to the development approval process, but efficiencies cannot come at the expense of due diligence, public health and informed local decision-making. Many certifying professionals, despite their expertise, may not be familiar with local conditions, City bylaws, development permit guidelines, and floodplain requirements, or other community-specific regulations, which is a key reason why local government reviews are essential to ensure accuracy and compliance. Local review processes benefit the public

by helping build safer and more sustainable neighbourhoods that reflect community needs and protect the environment over the long-term.

Challenges with the Professional Reliance Model

Reviewing building and infrastructure plans to safeguard public safety, the natural environment and local agriculture is an important role of local government. As part of these processes, our City staff frequently identify errors in plans and reports prepared by certifying professionals. We also note that these professionals often face pressure from their clients to sign-off on projects quickly and within budget.

In addition, while used infrequently, peer reviews can be an important part of the process to reduce risk and mitigate errors, particularly for more complex developments or projects with greater safety and environmental hazards. Under Bill M 216, these critical local safeguards are weakened, if not eliminated. Oversight responsibility shifts from the public sector—where it is transparent and democratically accountable—to the private sector, where the primary duty is to the client rather than the broader community.

Bill M 216 contradicts extensive evidence that demonstrates the limitations and failures of professional reliance. In 2018, the Province received a report on professional reliance in the natural resource sector that explicitly warned of “significant gaps in professional reliance models” and “substandard professional work.”¹ The report noted various high-profile environmental incidents, including the Mount Polley Tailings Storage Facility breach and the contamination of the Hullcar Aquifer, that had drawn public scrutiny and brought to light decreased confidence in professional reliance regulatory regimes. The report noted that when government cannot request information or verify compliance, it “loses its ability to prevent harm from occurring and is left only with enforcement tools after harm has occurred.”

While we understand that changes to the professional reliance framework were made in response to this 2018 report (e.g., the enactment of the Professional Governance Act and establishment of the office of the superintendent of professional governance), these changes were not intended to replace government review and oversight.

To that end, a 2022 report from the Ombudsperson on the Riparian Areas Protection Regulation found persistent non-compliance, high rejection rates and a need for greater

¹ Professional Reliance Review: The Final Report of the Review of Professional Reliance in Natural Resource Decision-Making (professionalgovernancebc.ca/app/uploads/sites/498/2019/05/Professional_Reliance_Review_Final_Report.pdf)

government oversight of qualified professionals.² The report stated that the effectiveness and accountability of the riparian regulation depend on qualified professionals following regulatory requirements. It also noted that, due to ongoing deficiencies, the Province has had to review all submissions from these professionals.

This highlights a clear and deeply concerning contradiction: professional reliance has been shown to require more oversight at the provincial level, yet Bill M 216 shifts the professional reliance model onto local governments without the safeguards the Province itself determined were necessary.

Liability for Local Governments and Taxpayers

Local government reviews of building and infrastructure plans help to prevent safety issues, environmental damage, infrastructure failures and costly problems in the future. If local governments are required to accept professionally certified plans, including plans for City infrastructure provided through development, significant errors and deficiencies may go undetected. This introduces significant and unacceptable risks for local governments and taxpayers who would be left with the cost of resolving any deficiencies, particularly if the professional, or their company, is unavailable to be held accountable.

Although Bill M 216 states that local governments will not be liable for damages caused by professional certification, legal experts have advised that, in the context of existing case law, the City would still carry liability where a builder, owner, subcontractor or qualified professional is dissolved or insolvent. The attempt in Bill M 216 to protect local governments from liability, furthermore, does not prevent a party from naming the City in its claim, and the City would be required to go through a costly court process to be removed from the action.

Inefficiencies and Processing Delays

It appears that the only remedy available under Bill M 216 to a local government who is concerned about the quality or accuracy of a professional certification is to refer the matter to the provincial Superintendent of Professional Governance for dispute resolution.

The Superintendent of Professional Governance is an office established by the Professional Governance Act to provide oversight of professional regulators. The office focuses on professional regulation, not the subject matter expertise applied by regulated

² Final Report on the Implementation of Recommendations from Striking a Balance: The Challenges of Using a Professional Reliance Model in Environmental Protection – British Columbia’s Riparian Areas Regulation (bcombudsperson.ca/wp-content/uploads/2025/08/StrikingABalance-Report-Jan5.pdf)

professionals. The Superintendent does not employ experts who could settle a dispute between two or more professionals about the technical aspects of a development proposal.

Requiring the Superintendent to resolve potential disputes from the 161 municipalities and 27 regional districts across the Province will almost certainly lead to increased inefficiencies and processing delays, exacerbating the very issue Bill M 216 seeks to address.

Loss of Local Knowledge and Authority

Bill M 216 shifts decision-making away from local governments, and places greater authority in the hands of private professionals. Additionally, shifting dispute resolution to the Superintendent of Professional Governance means moving responsibility away from those most familiar with the local geography and community dynamics. Instead, it places it with a provincial government office that would have no such knowledge or understanding.

Bill M 216 exemplifies the ongoing and concerning shift in decision-making powers from local governments to a centralized provincial authority. This shift is eroding the essential role of locally grounded knowledge—which is fundamental to ensuring developments fit their context, respect environmental constraints and meet the unique needs of the community.

Lack of Clarity and Consideration of other Legislation

Many aspects of Bill M 216, including its relationship to existing legislation that governs development approval processes, remain unclear. For example, it is not clear whether the requirement to accept professional submissions would apply to development permit approvals under the *Local Government Act*. Additionally, it is unclear how Bill M 216 might impact the matters to be considered by an approving officer for subdivision under the *Land Title Act*.

We understand that Bill M 216 has not benefited from the input of provincial staff, who could probably assist provincial elected officials in identifying additional concerns with Bill M 216, and its implications for other provincial legislation.

Absence of Consultation with Local Governments

The City of Pitt Meadows was not consulted prior to the introduction of Bill M 216, nor, as we understand, were any of our local government colleagues across the province. Significant legislative changes affecting development, land use and municipal authority

must be developed collaboratively with local governments. Meaningful consultation is essential to avoid unintended consequences and ensure legislation achieves its stated goals.

In closing, the City of Pitt Meadows supports efforts to reduce duplication, improve timeliness and accelerate housing delivery. However, these goals must be achieved through collaborative, evidence-based approaches that do not weaken local government oversight and create public safety concerns.

We urge the provincial government to reconsider this Bill and engage directly with municipalities before moving forward with changes that fundamentally alter local land use authority and the development process.

Sincerely,



Nicole MacDonald
Mayor, City of Pitt Meadows

cc: Pitt Meadows City Council
Mark Roberts, CAO
David Eby, Premier of British Columbia
Brittney Anderson, Minister of State for Local Governments and Rural Communities
Lisa Beare, MLA for Maple Ridge-Pitt Meadows
George Anderson, MLA for Nanaimo-Lantzville
Select Standing Committee on Private Bills and Private Members' Bills
BC Municipalities & Regional Districts
Councillor Cori Ramsay, Union of BC Municipalities President
Councillor Paul Albrecht, LMLGA President