

November 28, 2025

George Anderson
MLA for Nanaimo-Lantzville
Parliament Buildings
Victoria, BC V8V 1X4

Dear MLA Anderson,

Re: Significant Concerns Relating to Bill M216 – Professional Reliance Act

I am writing on behalf of Delta Council to outline our concerns and opposition to the Private Members Bill you have introduced, *Bill M216 - Professional Reliance Act*, which recently received second reading. Delta has consistently supported efforts to improve efficiency in development review processes, but the Bill as drafted, would create significant challenges for local governments.

Delta staff regularly review complex technical submissions prepared by professionals regulated under the Professional Governance Act. In some cases, these submissions contain errors, omissions, or assumptions requiring correction before a project can proceed. These issues often relate to, but are not limited to, engineering design, traffic analysis, drainage and stormwater systems, flood protection, geotechnical assessments, riparian considerations, and agrology reports. Delta's current process allows staff to work directly with applicants to resolve issues, and, where needed, to require peer reviews for complex or higher-risk projects in order to ensure public safety concerns are addressed.

Bill M216 would constrain this approach. The Bill requires local governments to accept certified submissions unless incomplete and allows peer reviews only if the Office of the Superintendent of Professional Governance approves them after receiving a formal complaint. Shifting routine technical resolution to a provincial office with limited capacity introduces new layers of process and will slow approvals. This is inconsistent with the goal of supporting efficient housing delivery and timely infrastructure decisions.

The Bill also raises accountability concerns. Residents and Council will continue to expect the City to ensure the safety and integrity of public infrastructure. If staff identify technical issues but are prevented from acting until a complaint process is completed, this creates risk and uncertainty for both applicants and the City.

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In addition to public accountability concerns, there is an additional financial burden placed on a local government that needs to be addressed. As the Bill is broad in its approach, it affects the off-site municipal works and services delivered by a developer. If required upgrades are not identified by a developer's consultant, Delta would either become responsible for the cost of those upgrades or would need to withhold occupancy until corrections are made. This now places added financial risk on the City and creates unnecessary delays and costs for applicants.

Delta is currently implementing multiple provincial housing and infrastructure initiatives. Introducing a new approval regime that reduces local review capabilities and increases reliance on a centralized provincial office will only increase housing approval delays and create unnecessary levels of red tape and unwarranted bureaucracy. This will halt the advancement of much-needed housing and infrastructure projects in our community.

For these reasons, Delta respectfully requests that you rescind Bill M216.

We will also be submitting these concerns directly to the Select Standing Committee on Private Bills and Private Members' Bills as part of the Committee's current review of Bill M216.

Yours truly,



George V. Harvie
Mayor

cc: Hon. David Eby, Premier
Hon. Christine Boyle, Minister of Housing and Municipal Affairs
Hon. Brittny Anderson, Minister of State for Local Governments and Rural
Communities
Select Standing Committee on Private Bills and Private Members' Bills
Hon. Ravi Kahlon, MLA for Delta North
Ian Paton, MLA for Delta South
Delta Council
Peter Weeber, Delta City Manager