

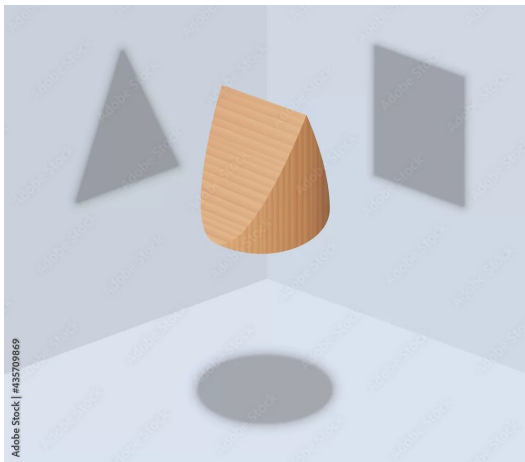


Letters of Assurance in Part 9 Buildings

June 17th, 2026

Presenter: Tim Warner

Email: twarner@boabc.org





Disclaimer

Information presented today does not directly represent the opinions of the Building Officials Association of BC (BOABC). This presentation is conceptual and for informal educational purposes only. The presenter and Association takes no responsibility for application of any concepts or interpretations in this presentation to specific projects.

The slides must not be considered complete or exhaustive. Code provisions have been generally represented and may not reflect all exceptions.

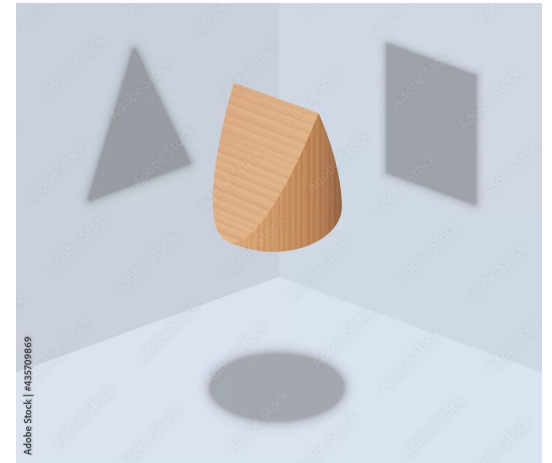


Land Acknowledgement

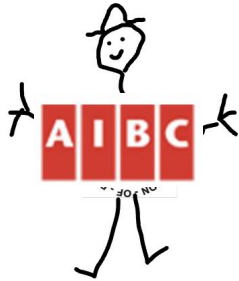
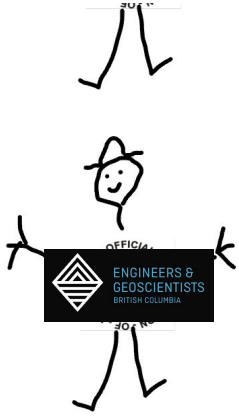
Welcome!

Today's Session:

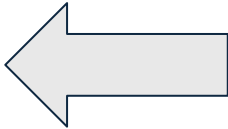
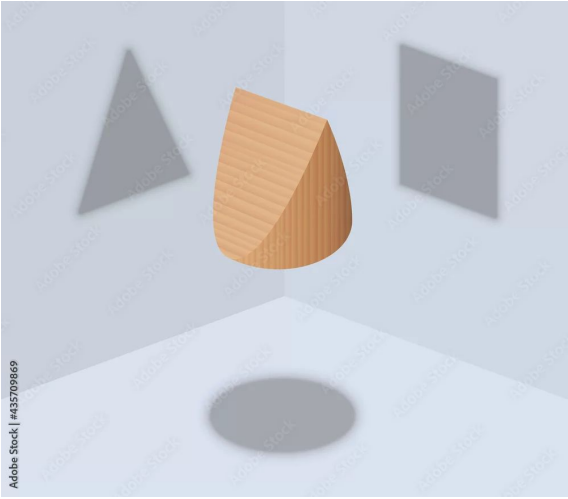
- History of Letters of Assurance
- Three Perspectives of LOAs
 - Building Code Accountability
 - Local Government Risk Management
 - Professional Practice



Why are we talking about Letters of Assurance?



Why are we talking about Letters of Assurance?



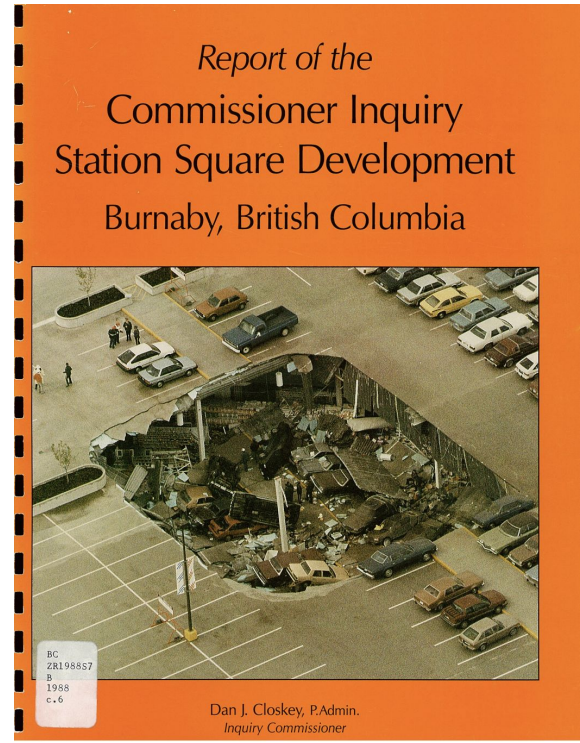
How can we talk about Letters of Assurance?

- Consider three different perspectives, with different implications
- Can reasonable people disagree on the application?
- Understand the source and limits of building officials authority
- Professionally communicate
- Make competent and informed decisions on behalf of our communities



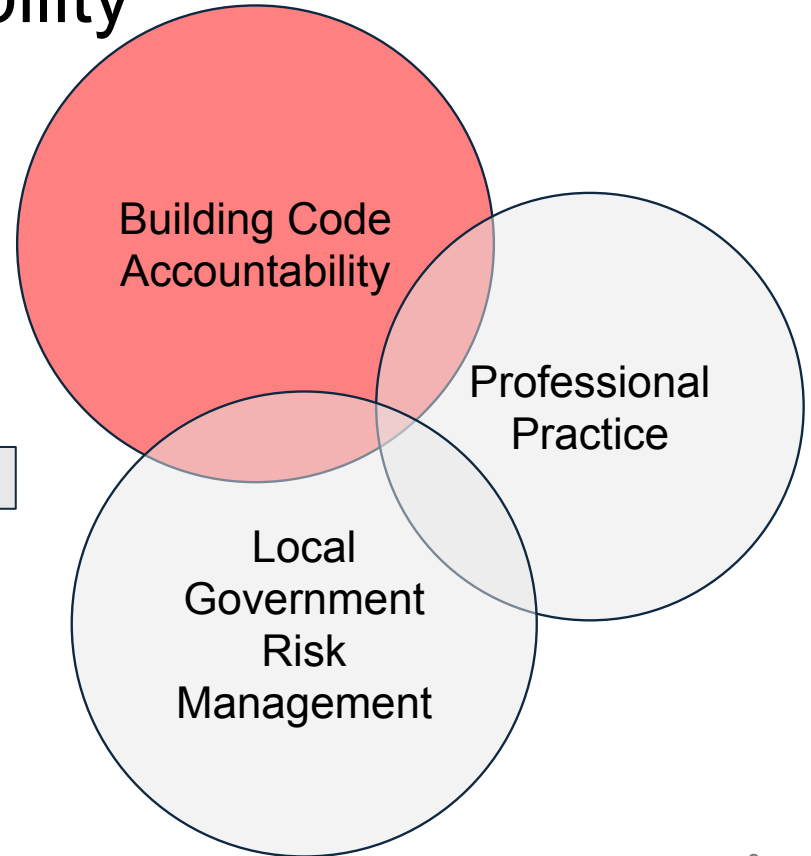
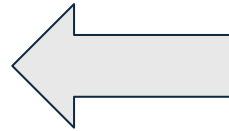
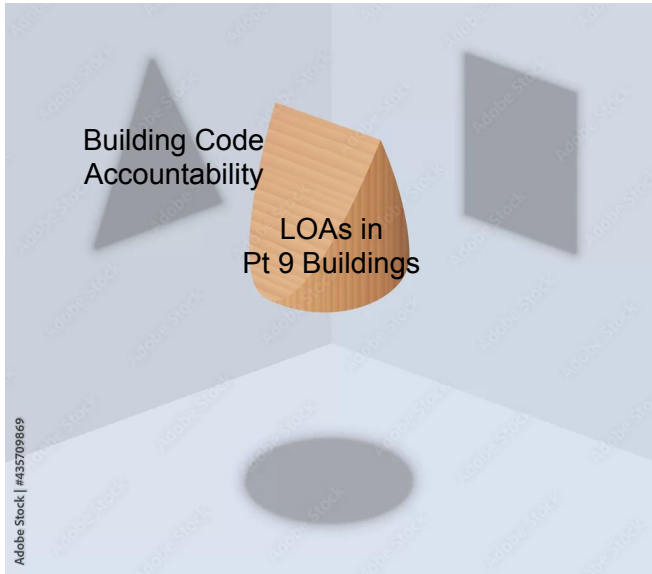
History of Letters of Assurance

- Station Square Roof Collapse April 23, 1988
- Closkey Commission Report August 26 1988
- 19 recommendations to reform the construction industry in BC
- Recommendation #2 related to standardised Letters of Assurance to be incorporated into the BCBC
- Introduced in BCBC 1992, Division C
- Scope and application has evolved over time
- Remain in BCBC 2024, Division C
- BCBC and VBBL only

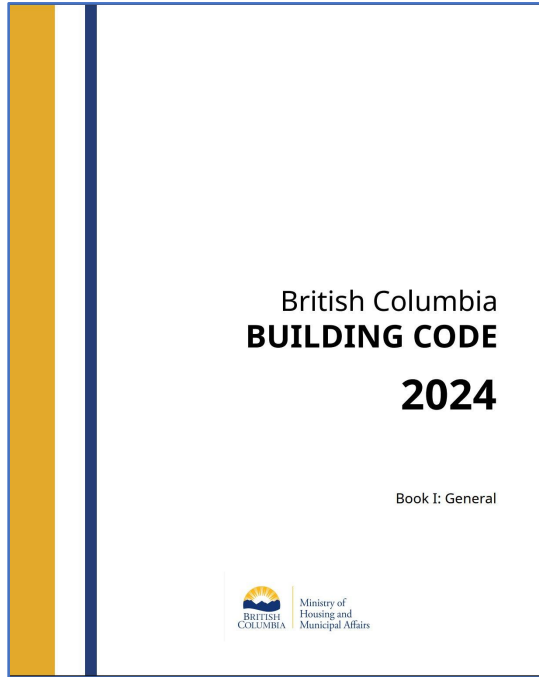


<https://www.llbc.leg.bc.ca/public/pubdocs/bcdocs/43459/commissionerinqirystationsquare.pdf>

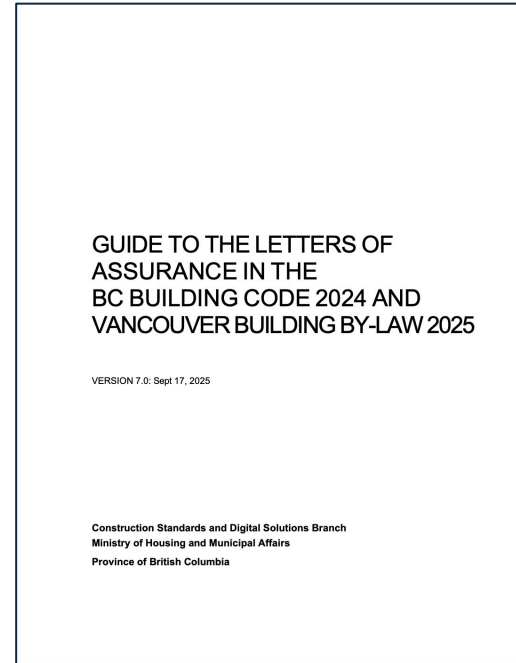
Building Code Accountability Perspective



Building Code Accountability



BC Building Code



<https://www2.gov.bc.ca/>

Building Code Accountability

4.2 What Letters of Assurance Are

Letters of Assurance are legal accountability documents that are required under the Building Code, intended to clearly identify the responsibilities of key participants in a construction project. Uniform, mandatory Letters of Assurance have been included as Schedules in the BC Building Code since December 1992 and in the Vancouver Building By-law since 1987.

The Building Code requires Letters of Assurance in specific instances to document the parties responsible for design and *field review* of construction, and to obtain their professional assurances that the design and the work substantially comply with the requirements of the Building Code and other applicable enactments respecting safety, except for construction safety aspects, and that the requisite *field reviews* will be and have been completed.

Letters of Assurance are signed and sealed by individual *coordinating registered professionals* and *registered professionals of record*, so the roles and responsibilities described in the Letters of Assurance rest with the individual rather than the firm.

Building Code Accountability

Registered professional means

- a person who is registered as an Architect with the Architectural Institute of British Columbia under the Professional Governance Act, or
- a person who is registered as a professional engineer or professional licensee engineering with the Association of Professional Engineers and Geoscientists of the Province of British Columbia under the Professional Governance Act.

Registered professional of record means a registered professional retained to undertake design work and field review in accordance with Subsection 2.2.7. of Division C.

Building Code Accountability

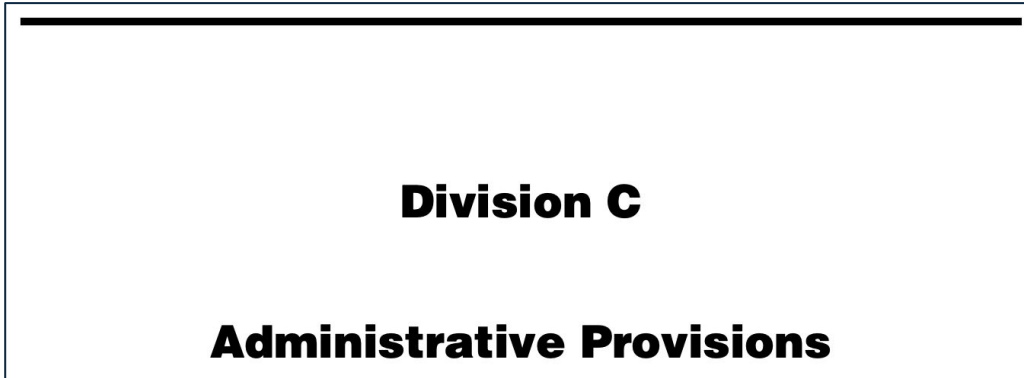
Coordinating registered professional means a registered professional retained under Clause 2.2.7.2.(1)(a) of Division C to coordinate all design work and field reviews of the registered professionals who are required for a project.

Field review means a review of the work

- at a *building* site, and
- where applicable, at locations where *building* components are fabricated for use at the *building* site

that a *registered professional* in their professional discretion considers necessary to ascertain whether the work substantially complies in all material respects with the plans and supporting documents prepared by a *registered professional*.

Building Code Accountability



BC Building Code

- Codified
- Standardised
- Provide Legal Building Code Accountability
- Equal standing to technical requirements
- Applicable across BC (even in areas without an AHJ)

Building Code Accountability

Schedule A

BRITISH COLUMBIA BUILDING CODE 2024

SCHEDULE A
Forming Part of Subsection 2.2.2.1(1), Division C of the
British Columbia Building Code

Building Permit Number
(for authority having jurisdiction's use)

**CONFIRMATION OF COMMITMENT BY OWNER
AND COORDINATING REGISTERED PROFESSIONAL**

Notes: (i) This letter must be submitted before issuance of a building permit.
(ii) This letter is endorsed by: Architectural Institute of BC, Association of Professional Engineers and Geoscientists of the Province of BC, Building Officials' Association of BC, and Union of BC Municipalities.
(iii) In this letter the words in italics have the same meaning as in the British Columbia Building Code.

*Re: Design and Field Review of Construction
by a Coordinating Registered Professional*

To: The authority having jurisdiction

Name of Jurisdiction (Print) _____

Re: Name of Project (Print) _____

Address of Project (Print) _____

(Professional's Seal and Signature)

Date _____

The undersigned has retained _____ as a coordinating registered professional to coordinate the design work and field reviews of the registered professionals of record required for this project. The coordinating registered professional shall coordinate the design work and field reviews of the registered professionals of record required for the project in order to ascertain that the design will substantially comply with the British Columbia Building Code and other applicable enactments respecting safety and that the construction of the project will substantially comply with the British Columbia Building Code and other applicable enactments respecting safety, not including the construction safety aspects.

Field reviews are defined in the British Columbia Building Code to mean those reviews of the work (a) at a project site of a development to which a building permit relates, and (b) where applicable, at fabrication locations where building components are fabricated for use at the project site.

that a registered professional of record in his or her professional discretion considers necessary to ascertain whether the work substantially complies in all material respects with the plans and supporting documents prepared by the registered professional of record for which the building permit is issued.

The owner and the coordinating registered professional have read Subsection 2.2.7, Division C of the British Columbia Building Code. The owner and the coordinating registered professional each acknowledge their responsibility to notify the addressee of this letter of the date the coordinating registered professional ceases to be retained by the owner before the date the coordinating registered professional ceases to be retained or, if that is not possible, then as soon as possible. The coordinating registered professional acknowledges the responsibility to notify the addressee of this letter of the date a registered professional of record ceases to be retained before the date the registered professional of record ceases to be retained or, if that is not possible, then as soon as possible.

It is the responsibility of the coordinating registered professional to ascertain which registered professionals of record are required, and to initial each Schedule B.

1 of 2

British Columbia Building Code 2024

Schedule B

BRITISH COLUMBIA BUILDING CODE 2024

SCHEDULE B
Forming Part of Subsection 2.2.7, Division C of the
British Columbia Building Code

Building Permit Number
(for authority having jurisdiction's use)

**ASSURANCE OF PROFESSIONAL DESIGN AND
COMMITMENT FOR FIELD REVIEW**

Notes: (i) This letter must be submitted prior to the commencement of construction activities of the components identified below. A separate letter must be submitted by each registered professional of record.
(ii) This letter is endorsed by: Architectural Institute of BC, Association of Professional Engineers and Geoscientists of the Province of BC, Building Officials' Association of BC, and Union of BC Municipalities.
(iii) In this letter the words in italics have the same meaning as in the British Columbia Building Code.

To: The authority having jurisdiction

Name of Jurisdiction (Print) _____

Re: Name of Project (Print) _____

Address of Project (Print) _____

The undersigned hereby gives assurance that the design of the (initial those of the items listed below that apply to this registered professional of record. All the disciplines will not necessarily be employed on every project.)

_____ ARCHITECTURAL
_____ STRUCTURAL
_____ MECHANICAL
_____ PLUMBING
_____ FIRE SUPPRESSION SYSTEMS
_____ ELECTRICAL
_____ GEOTECHNICAL — temporary
_____ GEOTECHNICAL — permanent

(Professional's Seal and Signature)

Date _____

components of the plans and supporting documents prepared by this registered professional of record in support of the application for the building permit as outlined below substantially comply with the British Columbia Building Code and other applicable enactments respecting safety (except for construction safety aspects).

The undersigned hereby undertakes to be responsible for field reviews of the above referenced components during construction, as indicated on the SUMMARY OF DESIGN AND FIELD REVIEW REQUIREMENTS' below.

CRP's Initials

1 of 4

British Columbia Building Code 2024

Building Code Accountability

Schedule A

BRITISH COLUMBIA BUILDING CODE 2024

SCHEDULE A
Forming Part of Subsection 2.2.7.11, Division C of the
British Columbia Building Code

Building Permit Number
(for authority having jurisdiction use)

**CONFIRMATION OF COMMITMENT BY OWNER
AND COORDINATING REGISTERED PROFESSIONAL**

Notes: (i) This letter must be submitted before issuance of a building permit.
(ii) This letter is endorsed by: Architectural Institute of BC, Association of Professional Engineers and Geoscientists of the Province of BC, Building Officials' Association of BC, and Union of BC Municipalities.
(iii) In this letter the words in italics have the same meaning as in the British Columbia Building Code.

Re: Design and Field Review of Construction
by a Coordinating Registered Professional

To: The authority having jurisdiction

Name of Jurisdiction (Print) _____

Re: Name of Project (Print) _____

Address of Project (Print) _____

(Professional's Seal and Signature)

The undersigned has retained _____ as a coordinating registered professional to coordinate the design work and field reviews of the registered professionals of record required for this project. The coordinating registered professional shall coordinate the design work and field reviews of the registered professionals of record required for the project in order to ascertain that the design will substantially comply with the British Columbia Building Code and other applicable enactments respecting safety and that the construction of the project will substantially comply with the British Columbia Building Code and other applicable enactments respecting safety, not including the construction safety aspects.

"Field reviews" are defined in the British Columbia Building Code to mean those reviews of the work

(a) at a project site of a development to which a building permit relates, and
(b) where applicable, at fabrication locations where building components are fabricated for use at the project site

that a registered professional of record in his or her professional discretion considers necessary to ascertain whether the work substantially complies in all material respects with the plans and supporting documents prepared by the registered professional of record for which the building permit is issued.

The owner and the coordinating registered professional have read Subsection 2.2.7, Division C of the British Columbia Building Code. The owner and the coordinating registered professional each acknowledge their responsibility to notify the addressee of this letter of the date the coordinating registered professional ceases to be retained by the owner before the date the coordinating registered professional ceases to be retained or, if that is not possible, then as soon as possible. The coordinating registered professional acknowledges the responsibility to notify the addressee of this letter of the date a registered professional of record ceases to be retained before the date the registered professional of record ceases to be retained or, if that is not possible, then as soon as possible.

*It is the responsibility of the coordinating registered professional to ascertain which registered professionals of record are required, and to initial each Schedule B.

1 of 2

British Columbia Building Code 2024

- Pre-permit requirement
- Outlines Owner and Coordinating Registered Professionals responsibilities to AHJ
- Commitments
- Notification Requirements

Building Code Accountability

- Pre-permit requirement
- Outlines Registered Professional of Record responsibilities
- Commitments
- Notification Requirements

Schedule B

BRITISH COLUMBIA BUILDING CODE 2024

SCHEDULE B
Forming Part of Subsection 0.2.7, Division C of the
British Columbia Building Code Building Permit Number
(for authority having jurisdiction's use)

**ASSURANCE OF PROFESSIONAL DESIGN AND
COMMITMENT FOR FIELD REVIEW**

Notes: (i) This letter must be submitted prior to the commencement of construction activities of the components identified below. A separate letter must be submitted by each registered professional of record.
(ii) This letter is endorsed by: Architectural Institute of BC, Association of Professional Engineers and Geoscientists of the Province of BC, Building Officials' Association of BC, and Union of BC Municipalities.
(iii) In this letter the words in *italics* have the same meaning as in the British Columbia Building Code.

To: The authority having jurisdiction

Name of Jurisdiction (Print) _____

Re: Name of Project (Print) _____

Address of Project (Print) _____

The undersigned hereby gives assurance that the design of the
(Initial those of the items listed below that apply to this registered professional of record. All the disciplines will not necessarily be employed on every project.)

_____ ARCHITECTURAL	<div style="border: 1px dashed black; padding: 5px;"><p style="text-align: center;"><small>(Professional's Seal and Signature)</small></p></div>
_____ STRUCTURAL	
_____ MECHANICAL	
_____ PLUMBING	
_____ FIRE SUPPRESSION SYSTEMS	
_____ ELECTRICAL	
_____ GEOTECHNICAL — temporary	
_____ GEOTECHNICAL — permanent	

Date _____

components of the plans and supporting documents prepared by this registered professional of record in support of the application for the building permit as outlined below substantially comply with the British Columbia Building Code and other applicable enactments respecting safety (except for construction safety aspects).

The undersigned hereby undertakes to be responsible for field reviews of the above referenced components during construction, as indicated on the "SUMMARY OF DESIGN AND FIELD REVIEW REQUIREMENTS" below.

CRP's Initials

1 of 4

British Columbia Building Code 2024

BC Building Code

Building Code Accountability

Schedule C-A

Schedule C-B

BRITISH COLUMBIA BUILDING CODE 2024

SCHEDULE C-A
Forming Part of Subsection 2.2.7, Division C of the
British Columbia Building Code

Building Permit Number
(for authority having jurisdiction use)

**ASSURANCE OF COORDINATION OF
PROFESSIONAL FIELD REVIEW**

Notes: (i) This letter must be submitted after completion of the project but before the occupancy permit is issued, or a final inspection is made, by the authority having jurisdiction.
(ii) This letter is endorsed by Architectural Institute of BC, Association of Professional Engineers and Geoscientists of the Province of BC, Building Officials' Association of BC, and Union of BC Municipalities.
(iii) In this letter the words in italics have the same meaning as in the British Columbia Building Code.

To: The authority having jurisdiction

Name of Jurisdiction (Print) _____

Re: Name of Project (Print) _____
Address of Project (Print) _____

(The coordinating registered professional shall complete the following.)

Name (Print) _____
Professional ID-BCBC and Signature) _____

Address (Print) _____

Address (Print) (continued) _____ Date _____

Phone Number and Email Address _____

I hereby give assurance that

(a) I have fulfilled my obligations for coordination of field reviews of the registered professionals of record required for the project as defined in Subsection 2.2.7, Division C of the British Columbia Building Code and in this previously submitted Schedule A "CONFIRMATION OF COMMITMENT BY OWNER AND BY COORDINATING REGISTERED PROFESSIONAL,"

(b) I have coordinated the functional testing of the fire protection and life safety systems to ascertain that they substantially comply in all material respects with

(i) the applicable requirements of the British Columbia Building Code and other applicable enactments respecting safety, not including construction safety aspects, and

(ii) the plans and supporting documents submitted in support of the application for the building permit,

(c) I have coordinated the field reviews to ascertain that the project substantially complies in all material respects with

(i) the applicable requirements of Part 10, and

(ii) the plans and supporting documents submitted in support of the application for the building permit,

(d) I am a registered professional as defined in the British Columbia Building Code.

(If the registered professional is a member of a firm, complete the following.)

I am a member of the firm _____
and I sign this letter on behalf of the firm. (Print name of firm)

Note: The above letter must be signed by a coordinating registered professional, who is also a registered professional. The British Columbia Building Code defines a registered professional to mean

(a) a person who is registered as an Architect with the Architectural Institute of British Columbia under the Professional Governance Act, or

(b) a person who is registered as a professional engineer or professional licensee engineering with the Association of Professional Engineers and Geoscientists of the Province of British Columbia under the Professional Governance Act.

1 of 1 CRP's Initials
British Columbia Building Code 2024

BRITISH COLUMBIA BUILDING CODE 2024

SCHEDULE C-B
Forming Part of Subsection 2.2.7, Division C of the
British Columbia Building Code

Building Permit Number
(for authority having jurisdiction use)

**ASSURANCE OF PROFESSIONAL FIELD REVIEW
AND COMPLIANCE**

Notes: (i) This letter must be submitted after completion of the project but prior to final inspection by the authority having jurisdiction. A separate letter must be submitted by each registered professional of record.
(ii) This letter is endorsed by Architectural Institute of BC, Association of Professional Engineers and Geoscientists of the Province of BC, Building Officials' Association of BC, and Union of BC Municipalities.
(iii) In this letter the words in italics have the same meaning as in the British Columbia Building Code.

To: The authority having jurisdiction

Name of Jurisdiction (Print) _____

Re: Discipline (e.g. Architectural, etc.) (Print) _____
Name of Project (Print) _____
Address of Project (Print) _____

(Each registered professional of record shall complete the following.)

Name (Print) _____
Professional ID-BCBC and Signature) _____

Address (Print) _____

Address (Print) (continued) _____ Date _____

Phone Number and Email Address _____

I hereby give assurance that

(a) I have fulfilled my obligations for field review as outlined in Subsection 2.2.7, Division C of the British Columbia Building Code and in the previously submitted Schedule B, "ASSURANCE OF PROFESSIONAL DESIGN AND COMMITMENT FOR FIELD REVIEW," and

(b) those components of the project opposite my initials in Schedule B substantially comply in all material respects with

(i) the applicable requirements of the British Columbia Building Code and other applicable enactments respecting safety, not including construction safety aspects, and

(ii) the plans and supporting documents submitted in support of the application for the building permit,

(c) I am a registered professional of record as defined in the British Columbia Building Code.

(If the registered professional of record is a member of a firm, complete the following.)

I am a member of the firm _____
and I sign this letter on behalf of the firm. (Print name of firm)

Note: The above letter must be signed by a registered professional of record, who is a registered professional. The British Columbia Building Code defines a registered professional to mean

(a) a person who is registered as an Architect with the Architectural Institute of British Columbia under the Professional Governance Act, or

(b) a person who is registered as a professional engineer or professional licensee engineering with the Association of the Professional Engineers and Geoscientists of the Province of British Columbia under the Professional Governance Act.

1 of 1 CRP's Initials
British Columbia Building Code 2024

- Pre-occupancy requirement
- Outlines confirmation of completion of responsibilities

Building Code Accountability

2.2.7. Professional Design and Review

(See Note A-2.2.7.)

2.2.7.1. Application

- 1) The requirements of this Subsection apply to
 - a) *buildings* within the scope of Part 3 of Division B,
 - b) *buildings* within the scope of Part 9 of Division B that are designed with common egress systems for the occupants and require the use of *firewalls* according to Article 1.3.3.4. of Division A, and
 - c) the following, in respect of *buildings* within the scope of Part 9 of Division B other than *buildings* described in Clause (b),
 - i) structural components that are not within the scope of Part 9 of Division B (See Note A-2.2.7.1.(1)(c)(i).),
 - ii) geotechnical conditions at *building* sites that are not within the scope of Part 9 of Division B,

British Columbia Building Codes 2024

Division C 2-9

- iii) sprinkler systems designed to NFPA 13, "Installation of Sprinkler Systems", and
- iv) standpipe and hose systems designed to NFPA 14, "Installation of Standpipe and Hose Systems".

- Administrative (Div C) requirements, triggered by technical (Div B) requirements
- Only scope where LOAs apply to Part 9

Building Code Accountability

9.4.2. Specified Loads

9.4.2.1. Application

(See Note A-9.4.2.1. and 9.4.2.2.)

1) This Subsection applies to light-frame constructions whose wall, floor and roof planes are generally comprised of frames of small repetitive structural members, and where

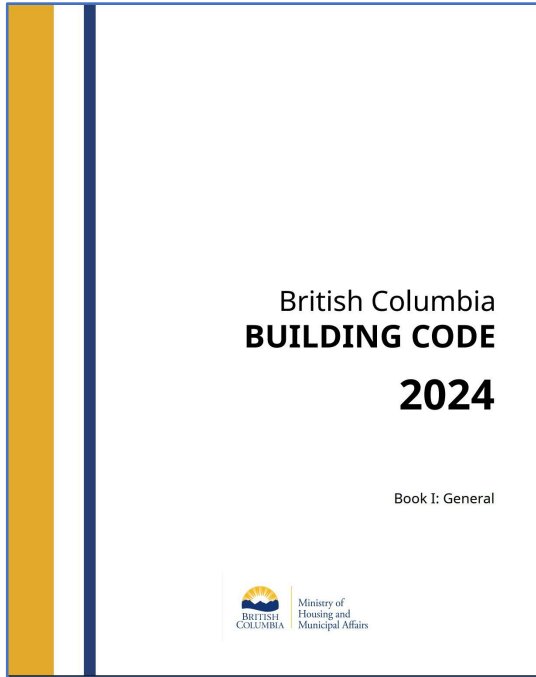
- a) the roof and wall planes are clad, sheathed or braced on at least one side,
- b) the small repetitive structural members are spaced not more than 600 mm o.c.,
- c) the clear span of any structural member does not exceed 12.2 m,

- Eg. Truss span exceeds 12.2m
- Site Class “F”

Table C-3
Seismic Design Parameters, S_{max} , for Selected Locations in Canada
Forming Part of Appendix C

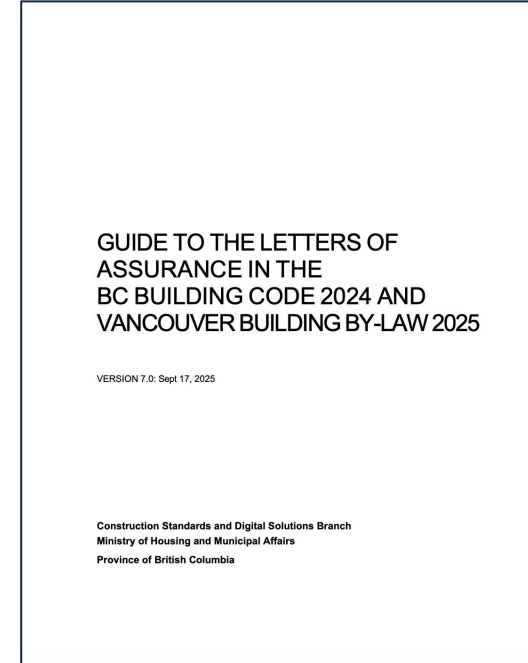
Province and Location	S_{max} for Unknown Site Class	S_{max} According to Site Class				
		A	B	C	D	E
British Columbia						
100 Mile House	0.283	0.0661	0.084	0.144	0.239	0.283
Abbotsford	1.07	0.381	0.473	0.742	1.01	1.07

Building Code Accountability



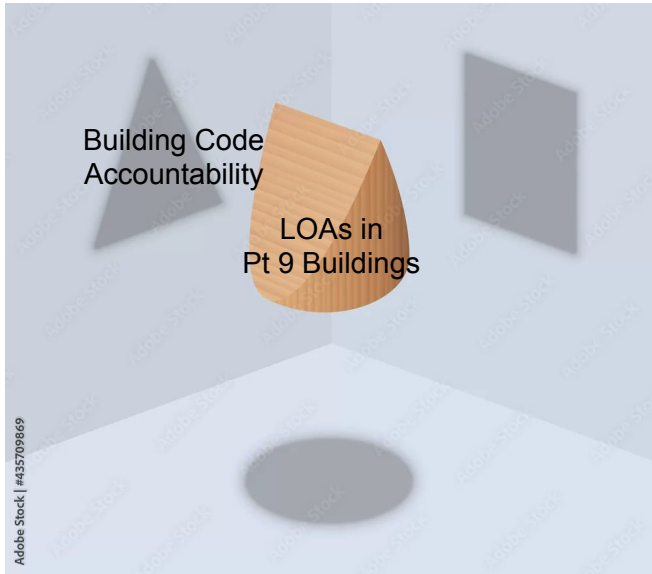
BC Building Code

- Primary references for understanding the “Building Code Accountability” perspective



<https://www2.gov.bc.ca/>

Building Code Accountability



BRITISH COLUMBIA

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BCAB 1977 - Letters of assurance for a Part 9 building

★ Publication date: August 25, 2025

Letters of assurance for a Part 9 building

Project Description

The project is the construction of a two-storey single family dwelling classified under Part 9 of the Code. The foundation consists of concrete on excavated ground, the structural roof, floors, and walls are constructed of cross-laminated timber, and the wood-framed deck is supported on screw piles. The high-performance building envelope contains atypical assemblies of materials.

Building Code Accountability

[Construction industry](#) / [Construction standards](#) / [Building Code Appeal Board](#) / [Decisions](#) / [BCAB_1491](#)

BCAB #1491 - Letters of Assurance for Part 9 Building, Sentence 2.6.1.1.(1)

★ Last updated on March 24, 2016

August 17, 1999

BCAB #1491

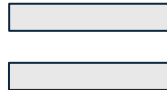
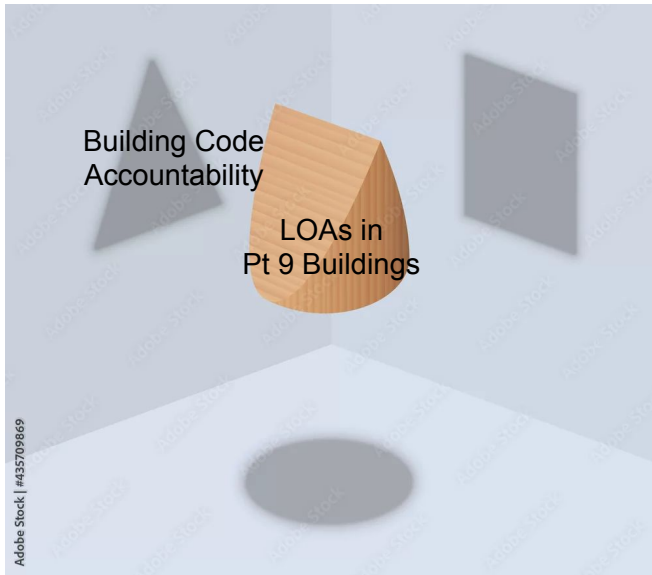
Re: Letters of Assurance for Part 9 Building, Sentence 2.6.1.1.(1)

Project Description

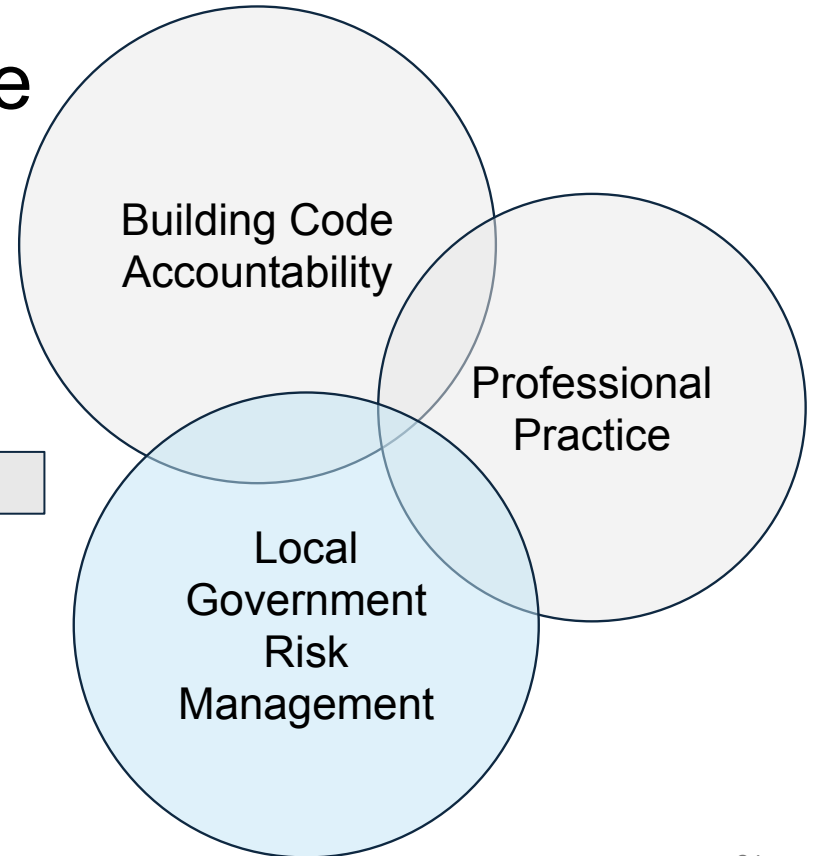
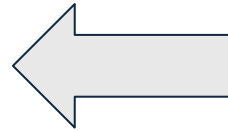
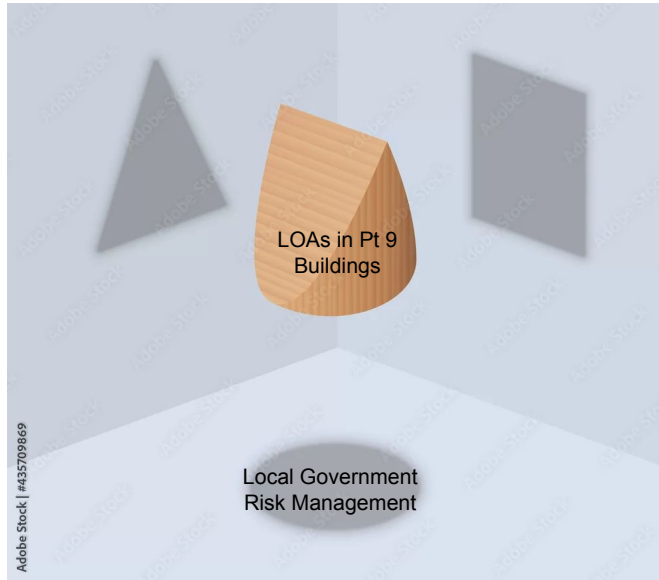
The project in question is a townhouse development with twelve three storey spatially separated buildings each of which is approximately 470 square metres in building area.

Reason for Appeal

Sentence 2.6.1.1.(1) requires "letters of assurance" from an architect or engineer for Part 3 buildings, Part 4 structural components and Part 9 buildings employing firewalls and common egress systems.

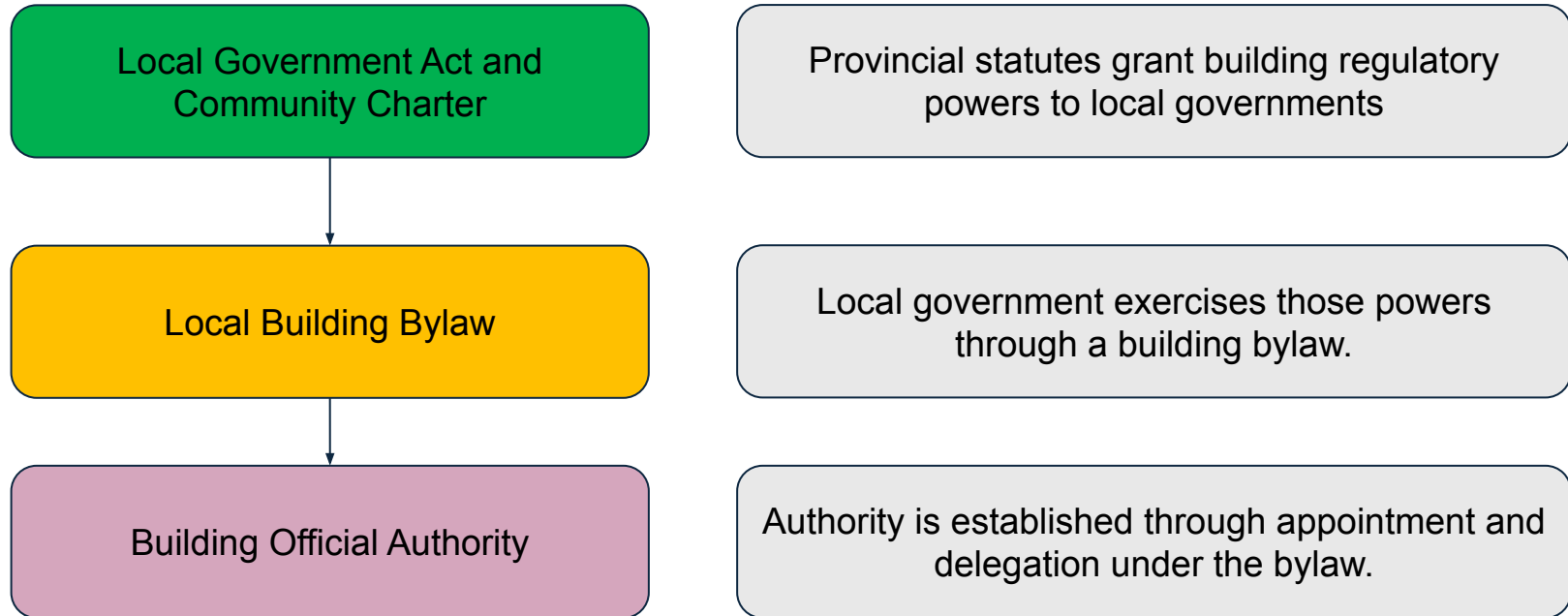


Local Government Risk Management Perspective

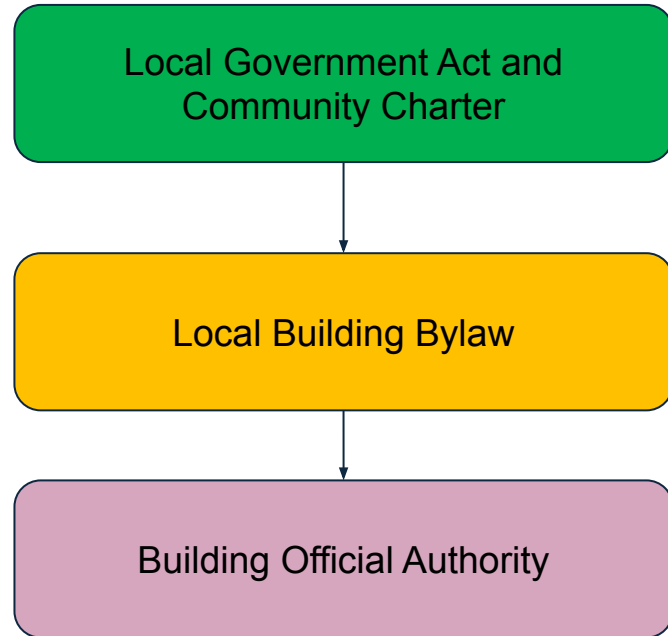


Local Government Risk Management

Source of building officials authority:



Local Government Risk Management



- Provincial legislation and local bylaws establish the authority and responsibilities of the Building Official.
- Building Officials exercise that authority to administer building regulation, protect public safety, and manage risk on behalf of the local government

Local Government Risk Management

This Act is current to June 9, 2026

See the [Tables of Legislative Changes](#) for this Act's legislative history, including any changes not in force.

COMMUNITY CHARTER

[SBC 2003] CHAPTER 26

Requirement for professional certification

55 (1) In this section, "qualified professional" means

- (a) an architect,
- (b) an architect certified under section 24 (2) (q,2) of the [Architects Act](#) as a specialist in an area of architecture,
- (c) a professional engineer,
- (d) a professional engineer who is a specialist under the [Professional Governance Act](#) in an area of professional engineering,
- (e) a professional geoscientist, or
- (f) a professional geoscientist who is a specialist under the [Professional Governance Act](#) in an area of professional geoscience.

(2) A council may, by bylaw, do one or both of the following:

- (a) require applicants for building permits, in circumstances as specified in the bylaw that relate to
 - (i) site conditions,
 - (ii) the size or complexity of developments, or
 - (iii) aspects of developments,

to provide the municipality with a certification by a qualified professional that the plans submitted with the permit application, or specified aspects of those plans, comply with the then current Provincial building regulations and other applicable enactments respecting safety;

- (b) authorize building inspectors for the municipality to require applicants for building permits to provide the municipality with a certification referred to in paragraph (a) if a building inspector considers that this is warranted by circumstances that relate to matters referred to in paragraph (a) (i) to (iii).

Local Government Act and
Community Charter

*applies also to Regional
Districts through LGA s302

Local Government Risk Management

This Act is current to June 9, 2026

See the [Tables of Legislative Changes](#) for this Act's legislative history, including any changes not in force.

LOCAL GOVERNMENT ACT

[RSBC 2015] CHAPTER 1

Deposited with Clerk

Local Government Act and Community Charter

Part 18 — Legal Proceedings in Relation to Local Governments and Other Authorities

Immunity in relation to approval of certified building plans

- 743** (1) If a municipality or regional district issues a building permit for a development that does not comply with the Provincial building regulations or another applicable enactment respecting safety, the municipality or regional district must not be held liable, directly or vicariously, for any damage, loss or expense caused or contributed to by an error, omission or other neglect in relation to its approval of the plans submitted with the application for the building permit if
- (a) a person representing themselves as a professional engineer or architect registered as such under Provincial legislation certified, as or on behalf of the applicant for the permit, that the plans or the aspects of the plans to which the non-compliance relates complied with the then current Provincial building regulations or other applicable enactment to which the non-compliance relates, and
 - (b) the municipality or regional district, in issuing the building permit, indicated in writing to the applicant for the permit that it relied on the certification referred to in paragraph (a).
- (2) Subsection (1) does not apply if the municipality or regional district knew that the person making the certification referred to in that subsection was not, at the time of certification, registered as a professional engineer or architect under Provincial legislation.
- (3) If a municipality or regional district makes an indication in accordance with subsection (1) (b), it must reduce the fee for the building permit to reflect the costs of the work that would otherwise be done by a building inspector to determine whether the plans or the aspects of the plans that were certified to comply do in fact comply with the Provincial building regulations and other applicable enactments respecting safety.

Local Government Risk Management

- A Building Official has a responsibility to provide “written reasons” for refusal to issue permit

Local Government Act and
Community Charter

Municipalities: Community Charter, s54

Building permits and occupancy permits

- 54 (1) If requested by an applicant, a building inspector must give written reasons for the building inspector's refusal to issue a building permit that is required by a bylaw under section 8 (3) (l) *[spheres of authority — buildings and other structures]*.

Regional Districts: Local Government Act, s298

- (3) If requested by an applicant, the building inspector must give written reasons for the building inspector's refusal to issue a building permit required under this section.

Local Government Risk Management

Local Building Bylaw

15. Professional Design and Field Review

15.1 When a Building Official considers that the site conditions, size or complexity of a development or an aspect of a development warrant, they may require a registered professional provide design and plan certification and field review by means of Letters of Assurance in the form of Schedules B and C-B referred to in Division C of Part 2 of the Building Code.

15.2 Prior to the issuance of an occupancy certificate for a complex building or standard building in circumstances where Letters of Assurance have been required in accordance with Sections 9.1.12, 10.2.5 or 15.1 of this bylaw, the owner shall provide the municipality with Letters of Assurance in the form of Schedules C-A and/or C-B, as is appropriate, referred to in Division C of Part 2 of the Building Code.

City of Nanaimo
Building Bylaw

Local Government Risk Management

Local Building Bylaw

Requirement for a Qualified registered professional

- 10.3 The *owner* must retain a *qualified registered professional* to provide a *professional design* and plan certification and *letters of assurance* in the form of Schedules A, B, C-A and C-B referred to in subsection 2.2.7, Division C, of the *building code*, in respect of a *permit application*:
- (a) prior to the *pre-occupancy site review* coordinated by the *coordinating qualified registered professional* or other *qualified registered professional* for a *complex building*,
 - (b) prior to a final inspection for a *simple building* in circumstances where *letters of assurance* have been required in accordance with the requirements of the *building code*, in which case the *owner* must provide the City with *letters of assurance* in the form of Schedules C-A or C-B, as appropriate, referred to in subsection 2.2.7, Division C, of the *building code*,
 - (c) for a *building* that is designed with common egress systems for the occupants and requires the use of *firewalls* in accordance with the *building code*;
 - (d) prior to *alterations* to a *building*, or to a structural component of a *building* described in paragraph (b);
 - (e) for a *building* in respect of which the *building official* determines that site conditions, size or complexity warrant, and that such registered professional have particular expertise or qualifications to address the particular site conditions, size or complexity;

City of Fernie
Building Bylaw

Local Government Risk Management

Requirement for a Registered Professional

- 11.3. The **owner** must retain a registered professional to provide a **professional design** and plan certification and letters of assurance in the form of Schedules A , B, C-A and C-B as referred to in the **Building Code**, in respect of a **permit** application
- (a) prior to the pre-occupancy site review coordinated by the **coordinating registered professional** or other registered professional for a **complex building**; or
 - (b) prior to an occupancy inspection for a **simple building** in circumstances where letters of assurance have been required in accordance with the requirements of the **Building Code**, in which case the **owner** must provide the **City** with letter of assurance in the form of Schedules C-A or C-B, as appropriate, referred to in the **Building Code**;
 - (c) **foundation** and excavation components of new **simple buildings** and **additions** greater than 55m² to **simple buildings** in accordance with the **Building Code**; except where an unsafe condition may exist;
 - (d) a **building** that is designed with common egress systems for the occupants and requires the use of firewalls in accordance with the **Building Code**;
 - (e) prior to **alterations** to a **building**, or to structural component of a **building** described in paragraph (b);
 - (f) for a **building** in respect of which the **building official** determines that site conditions, size or complexity so warrant in the interests of safety or persons or protection of property under the **Building Code**;

Local Building Bylaw

City of Penticton
Building Bylaw

Local Government Risk Management



Our History



We were formed in 1987 by 144 local governments who could not find reasonable insurance coverage.

In the mid-1980s, local governments in this province were facing a crisis. Liability insurance premiums had increased five-fold for many of B.C.'s local governments, deductibles were soaring, and policy limits were falling. Most concerning was the lack of available coverage for certain major liability exposures.

It seemed that the only options were either to increase taxes or accept insufficient coverage. Seeing that the solution was not going to emerge from private industry, the communities in B.C. turned to each other for support. The Union of B.C. Municipalities created a task force that returned with the recommendation to establish a self-insurance pooling program, resulting in the creation of the MIABC in 1987.

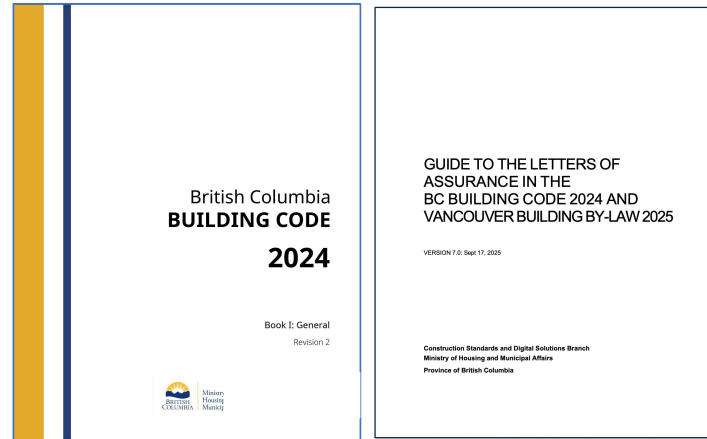
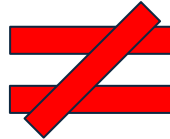
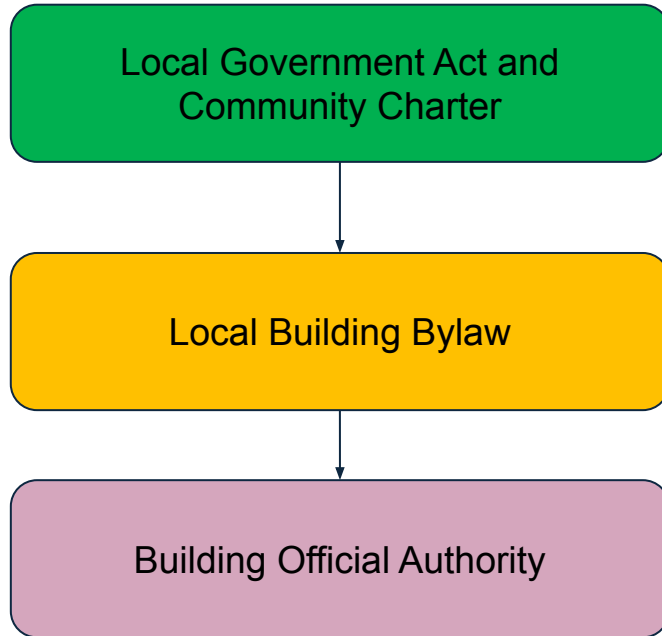
Local Government Risk Management



Local Building Bylaw

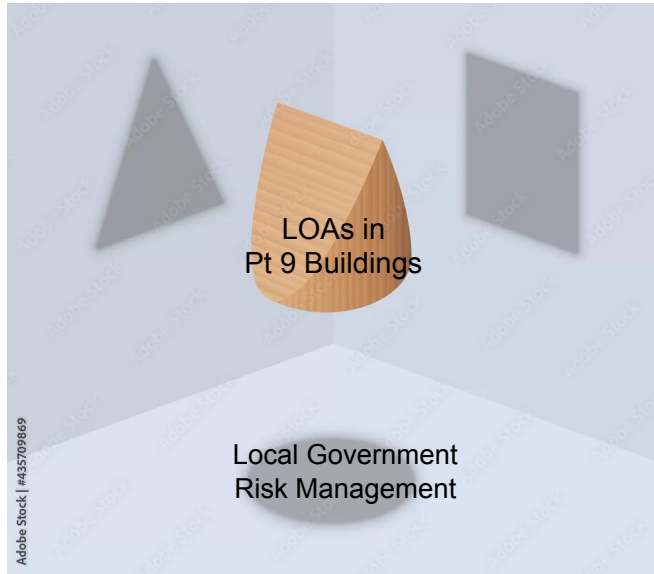
- 2002 MIABC Core Building Bylaw
- 2018 MIABC Model Building Bylaw
- BCBC Letters of Assurance are “appropriated” by the Local Bylaws as a mechanism to manage local government risk

Local Government Risk Management



- **Administrative** (Div C) requirements, triggered by technical (Div B) requirements

Local Government Risk Management



Search Menu

< [Sources and industry](#) / [Construction industry](#) / [Construction standards](#) / [Building Code Appeal Board](#) / [Decisions](#) / [Decision 1977](#)

BCAB 1977 - Letters of assurance for a Part 9 building

Publication date: August 25, 2025



Letters of assurance for a Part 9 building

Project Description

The project is the construction of a two-storey single family dwelling classified under Part 9 of the Code. The foundation consists of concrete on excavated ground, the structural roof, floors, and walls are constructed of cross-laminated timber, and the wood-framed deck is supported on screw piles. The high-performance building envelope contains atypical assemblies of materials.

The Board has neither jurisdiction nor comment on the local authority's powers, under legislation other than the *Building Act* and the Code, to require professional assurances or accountability documents, as discussed in Section 5 of the Guide.

Don Pedde
Chair, Building Code Appeal Board

Local Government Risk Management

[Construction industry](#) / [Construction standards](#) / [Building Code Appeal Board](#) / [Decisions](#) / **BCAB_1491**

BCAB #1491 - Letters of Assurance for Part 9 Building, Sentence 2.6.1.1.(1)

✦ Last updated on March 24, 2016

August 17, 1999

BCAB #1491

Re: Letters of Assurance for Part 9 Building, Sentence 2.6.1.1.(1)

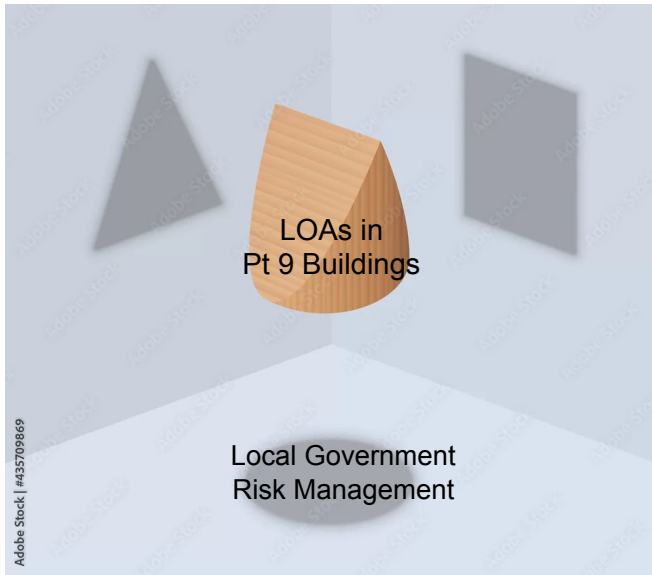
Project Description

The project in question is a townhouse development with twelve three storey spatially separated buildings each of which is approximately 470 square metres in building area.

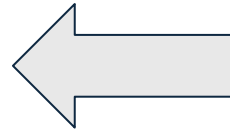
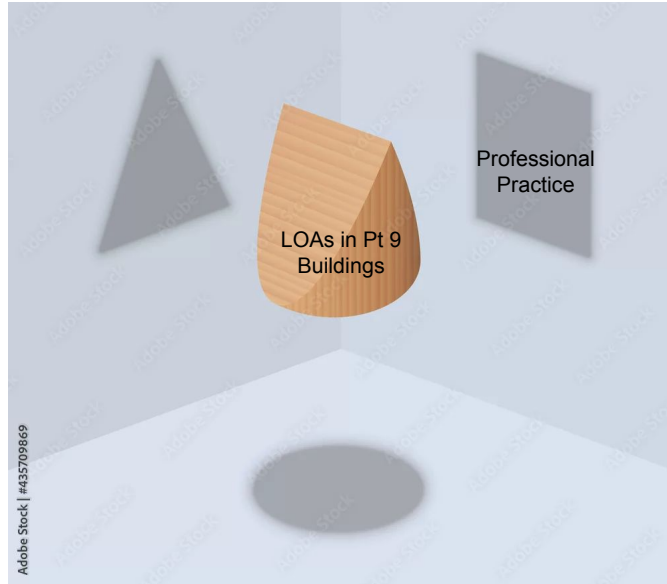
Reason for Appeal

Sentence 2.6.1.1.(1) requires "letters of assurance" from an architect or engineer for Part 3 buildings, Part 4 structural components and Part 9 buildings employing firewalls and common egress systems.

The Board concurs with the appellant that Section 2.6 does not apply to the building in question. However, the Board has no jurisdiction over local government building bylaws and cannot provide a ruling in this case.



Professional Practice Perspective



Part 9 LOA Requirements

EGBC Perspective

ALLISON CHEN, P.ENG., P.E.

JUNE 17, 2026



ENGINEERS &
GEOSCIENTISTS
BRITISH COLUMBIA

Letters of Assurance Requirements for Part 9 Buildings – AIBC/EGBC

- Published May 2021
- Outline LOA requirements when building is Part 9 but some components are not.
- Focus on the practice of architecture and engineering, NOT telling the AHJ what to do

[AIBC-EGBC Joint Practice Guidelines-BC Building Code Letters of Assurance Requirements for Part 9 Buildings, V1.1](#)

JOINT PROFESSIONAL PRACTICE GUIDELINES

BRITISH COLUMBIA BUILDING CODE LETTERS OF ASSURANCE REQUIREMENTS FOR PART 9 BUILDINGS

VERSION 1.1 MAY 13, 2021



Triggering of Seals and LOAs

- Professional involvement does NOT trigger use of LOAs
- Use of seal does not trigger use of LOAs
- Only the code and local bylaws trigger use of LOAs

LOAs were not designed for use in Part 9 buildings or Part 9 components; some discretion is required.

LOA Requirements

Part 4 Structural

- Any structural elements outside of the scope of Part 9
 - LOAs are required
- Associated document:
 - Professional Practice Guidelines – Professional Structural Engineering Services for Part 9 Buildings (Engineers and Geoscientists BC)

Part 4 Geotechnical

- Any geotechnical conditions outside of the scope of Part 9
 - LOAs are required
- Associated document:
 - Professional Practice Guidelines – Geotechnical Engineering Services for Building Projects (Engineers and Geoscientists BC)

Sprinkler, Standpipe and Hose Systems

- Sprinkler system is designed to NFPA 13 but not to NFPA 13R or 13D, or
- Standpipe and hose systems designed to NFPA 14
 - LOAs are required

Part 5 Environmental Separation

- If materials, methods and/or referenced standard in Part 9 are not used, may go to Part 5
- As this option is not specifically noted in the BCBC
 - LOAs are NOT required
- Associated documents:
 - Professional Practice Guidelines – Building Enclosure Engineering Services (Engineers and Geoscientists BC)

Part 6 Heating Ventilation and Air-conditioning

- Sections 9.32. and 9.33. provide criteria for when a design can stay in Part 9 or goes to Part 6
- As this option is not specifically noted in the BCBC
 - LOAs are NOT required

NECB for Energy Efficiency

- Section 9.36 contains provisions for when Part 9 buildings are to be designed to the National Energy Code of Canada for Buildings (NECB)
- As this option is not specifically noted in the BCBC,
 - LOAs are NOT required
- Associated document:
 - Joint Professional Practice Guidelines – Whole Building Energy Modelling Services (AIBC and Engineers and Geoscientists BC)

Alternative Solutions

- As per the BCBC,
 - LOAs are NOT required & NOT appropriate
- Registered professionals are not required by code BUT for alternative solutions related to one of the professional disciplines, registrants are expected to:
 - Only rely on alternative solutions prepared by other registered professionals
 - Authenticate their own alternative solution reports
 - Conduct field reviews

Currently under revision!

Structural Engineering Services for Part 9 Buildings

- Components need to be supported and integrated into the building.
- The appropriate assurances are Schedules S-B and S-C.
- Schedules B & C-B are not proper substitutions for Schedules S-B & S-C.
- When LOAs are used for components, the scope must be made clear between the LOAs [and the plans and supporting documents](#).

LOA Mark Up Example

Re: Tall wall GL C @ 123 Sesame Street

Name of Project (Print)

Address of Project (Print)

Okay to cross out if
no shop drawings

STRUCTURAL Tall wall GL C

- 2.1 Structural capacity of ~~structural components of the building~~, including anchorage and seismic restraint
- 2.2 ~~Structural aspects of deep foundations~~
- 2.3 Review of all applicable shop drawings
- 2.4 ~~Structural aspects of unbonded post tensioned concrete design and construction~~
- 2.5 Independent review of structural designs

Independent Review of Structural Designs

Independent review is an evaluation

- of the structural design **concept, details, and documentation**
- of **substantially complete** structural design documents
- **before they are issued** for construction or implementation
- by an **appropriately qualified and experienced** registrant
- who was **not involved** in preparing the design.

STRUCTURAL

- 2.1 Structural capacity of structural components of the *building*, including anchorage and seismic restraint
- 2.2 Structural aspects of *deep foundations*
- 2.3 Review of all applicable shop drawings
- 2.4 Structural aspects of unbonded post-tensioned concrete design and construction
- 2.5 Independent review of structural designs

Independent Review of Structural Designs cont'd

Independent review is required for all structural designs, even components.

Two exceptions:

- one- or two-family homes that fall under the prescriptive requirements of Part 9 of the code.
- Retaining walls under 3 m

Since Independent Review is required for all structural designs and nothing should be crossed off the LOA that applies to the building (as per the code), [Line 2.5 Independent Review of Structural Designs](#) should not be crossed off.

THANK YOU

practiceadvisor@egbc.ca

Quality Management Guides
Guidelines & Advisories



Collaborative Efforts



ENGINEERS &
GEOSCIENTISTS
BRITISH COLUMBIA

PRACTICE ADVISORY

PROFESSIONAL CONDUCT BETWEEN SUBMITTING PROFESSIONALS AND AUTHORITIES HAVING JURISDICTION

VERSION 1.1, MAY 27, 2025

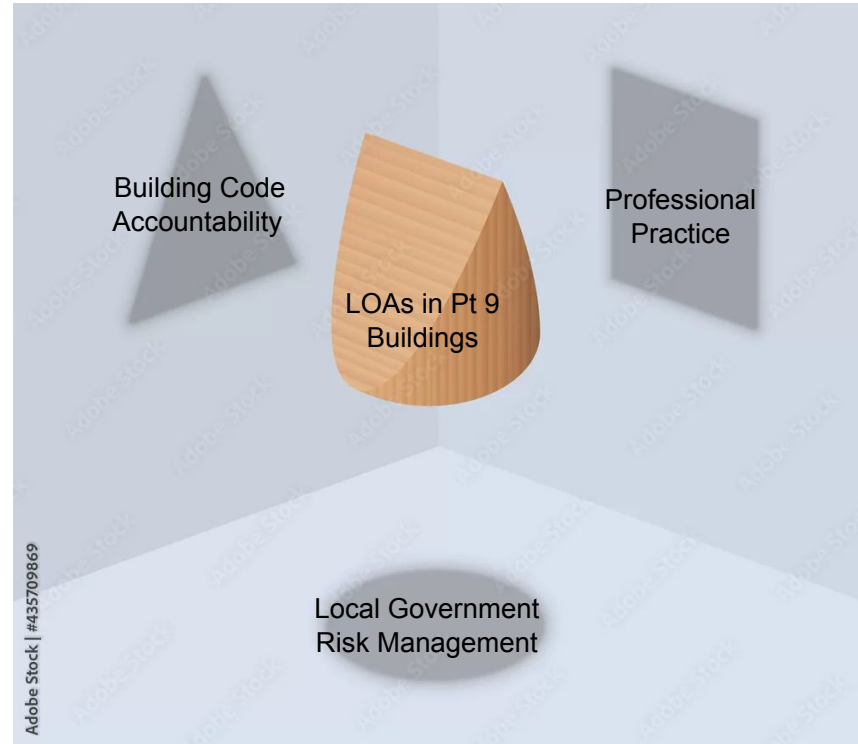
This practice advisory has been issued for registrants and registrant firms of Engineers and Geoscientists BC, to clarify the expectations of professional conduct between design professionals submitting engineering/geoscience work (Submitting Professionals) and Authorities Having Jurisdiction (AHJs) during approval and/or submissions processes such as building permit or development applications. An AHJ is defined as in the *BC Building Code*: the governmental body (usually municipal) responsible for the enforcement of any part of the *BC Building Code* or the official or agency designated by that body to exercise such a function.

BACKGROUND

This practice advisory is intended to address common communication challenges that arise between Submitting Professionals and AHJs during the approval and/or submissions processes. Engineers and Geoscientists BC is aware of the following scenarios that can commonly create friction points, and has provided professional practice considerations to help resolve them:

- **Scenario 1:** The AHJ's process requirements and Engineers and Geoscientists BC requirements are incompatible.
- **Scenario 2:** Submitting Professional provides incomplete, disjointed, or disorganized plans and documentation to the AHJ.
- **Scenario 3:** Technical or specific direction is provided by the AHJ during regulatory review.
- **Scenario 4:** Submitting Professional is not responsive to AHJ requests for additional documentation.
- **Scenario 5:** Submitting Professional is unaware of process requirements, there is a lack of clarity in the AHJ's requirements, or there is inconsistency in application of requirements.
- **Scenario 6:** The quality of work or qualifications of the Submitting Professional is questioned.

<https://www.egbc.ca/>



Other Webinars



BOABC – 2024 BCBC,
Bylaws & Regulations
for Registered
Professional

March 21, 2024
Hosted by: Ken Kunka, BCQ

Promoting Building Safety and Professionalism

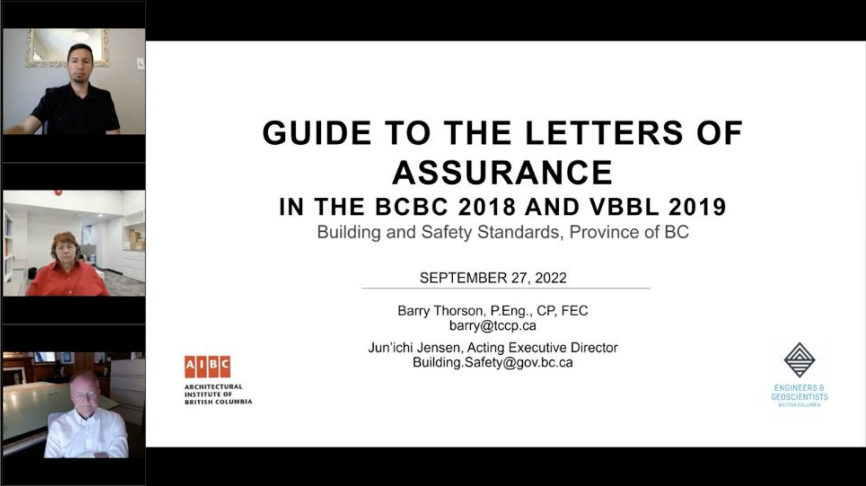
https://boabc.org/wp-content/uploads/2023/11/BOABC-LL-Feb-21-24-Registered-Professional_v2-Copy_compressed.pdf

Update to the Guide to the Letters of Assurance



Log in to enable this activity to be tracked and recorded in your Continuing Education Reporting System.

Video





**GUIDE TO THE LETTERS OF
ASSURANCE**
IN THE BCBC 2018 AND VBBL 2019
Building and Safety Standards, Province of BC

SEPTEMBER 27, 2022

Barry Thorson, P.Eng., CP, FEC
barry@tcpc.ca

Jun'ichi Jensen, Acting Executive Director
Building.Safety@gov.bc.ca



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End/Questions?



Tim Warner

Email:
twarner@boabc.org

