

IN THE MATTER OF THE *INTERNATIONAL CREDENTIALS RECOGNITION ACT*

S.B.C 2023, c.39 [The Act]

**IN THE MATTER OF A REQUEST FOR AN EXEMPTION PURSUANT TO SECTION 21(1)(a) of
the Act**

By

The Architectural Institute of British Columbia

From the

PROHIBITION ON CANADIAN WORK EXPERIENCE REQUIREMENTS

DECISION UNDER SECTION 23(1)

WHEREAS:

- A. Section 16 of the *International Credentials Recognition Act* prohibits regulatory authorities from imposing a requirement for Canadian work experience on internationally trained applicants who meet section 4(3) of the *International Credentials Recognition Regulation* (ICRR).
- B. Section 4(2) of the ICRR lists prohibited Canadian work experience requirements for internationally trained applicants who meet the criteria listed in section 4(3) of the *ICRR*.
- C. Section 21 of the Act provides the Superintendent of International Credential Recognition the authority to grant an exemption to a regulatory authority from the prohibition on the Canadian work experience requirement.
- D. The Architectural Institute of British Columbia (AIBC) regulates the profession of architecture in British Columbia in the interest of the public.
- E. The AIBC made an application for an exemption from the prohibition on Canadian work experience requirements for internationally trained applicants on March 12, 2025. The application is in respect to the 6 months of Canadian work experience required as part of the Broadly Experienced Foreign Architect Program.

- F. The Office for International Credential Recognition evaluated the application for an exemption in accordance with the criteria in section 5 of the ICRR. From the evidence presented by AIBC it appears that:
- a. Assessment of the competencies of an internationally trained applicant is consistent with section 12(b) of the Act as the competencies relate to the safety, health and welfare of the public, consumers and the environment in the following ways:
 - i. The competencies identified by AIBC result in safe, healthy, accessible and efficient buildings and safeguard the financial interests of consumers.
 - b. An alternative means to Canadian work experience does not exist to assess whether an internationally trained applicant has a competency
 - i. Many of the competencies identified by AIBC must be assessed on-site to ensure applicants can apply their knowledge in real-world scenarios.
 - c. An alternative means to Canadian work experience does not exist to acquire a competency
 - i. Canadian legislation, climate, geography, and architectural roles create a unique environment where competencies cannot be gained through alternative means or outside of the country. The competencies require a high level of application and administration, necessitating direct exposure to project workflows and decision-making within the BC context. Observing or performing the work firsthand is essential for competency acquisition.
 - d. A requirement for Canadian work experience to assess whether an internationally trained applicant has the competencies is proportionate to the risk of harm to the public, the environment, animal or plant life or health, or consumers if the competencies were not assessed or assessed by a means other than with Canadian work experience.
 - i. The 6-month Canadian work experience requirement is justified by the significant risks to public safety, health, and consumer finances as a result of legal noncompliance, unsafe building practices, and misapplication of Canadian contract and procurement standards.
 - e. Other information considered was:
 - i. Internationally trained applicants who are not registered with AIBC can work in an architectural firm under the supervision of a licensed

architect. This mitigates the "catch-22" issue of requiring experience while unlicensed.

- ii. Registration grants unrestricted practice rights which means that a newly registered architect with AIBC could open a sole practice without access to a network of experienced professionals for guidance and support. The 6 months of Canadian work experience serves as an essential safeguard to ensure competency before independent practice.
- iii. The Broadly Experienced Foreign Architect Program framework is a nationally recognized standard. If AIBC were to remove the 6-month Canadian work experience requirement, a new assessment process for internationally trained applicants seeking licensure in BC would need to be developed. A separate version of the Broadly Experienced Foreign Architect Program could create inconsistencies, potentially preventing other provinces from recognizing BC-registered architects, thereby restricting labour mobility.
- iv. AIBC, through the Regulatory Organizations of Architecture in Canada, is actively working to expand Mutual Recognition Agreements to reduce the need for Canadian work experience for applicants from certain countries in the future. Mutual Recognition Agreements streamline registration requirements, allowing eligible internationally trained applicants to bypass reassessment of their education, experience, and examinations.

NOW THEREFORE,

Pursuant to section 23(1) of the Act:

1. The AIBC is granted an exemption in respect of the following Canadian work experience requirement:
 - a. 6 months of Canadian work experience for individuals registering to become Architects AIBC through the Broadly Experienced Foreign Architect Program.
2. The exemption is effective as of July 1, 2025.



Kate Haines
Superintendent of International Credential Recognition
Office for International Credential Recognition

Date: June 30, 2025