

[REDACTED]

[REDACTED] Lori Arnold <lori@macinteriordesign.com>
Sent: March 17, 2025 2:20 PM
To: Office of the Legislative Counsel
Subject: RE: Letter of Concern Bill 36 Labour and Mobility Within Canada Act from IDNS
Attachments: IDNS -Bill 36 Speaking Notes to send.pdf

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Good afternoon

Interior Designers of Nova Scotia would like the attached document to be distributed to the Public Bills Committee.

Thank you.

Lori Arnold

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From: Office of the Legislative Counsel <legc.office@novascotia.ca>

Sent: March 14, 2025 6:04 PM

To: Lori Arnold <lori@macinteriordesign.com>

Subject: RE: Letter of Concern Bill 36 Labour and Mobility Within Canada Act from IDNS

Good evening Lori,

Thank you for your written submission, a copy of which will be distributed to each member of the Public Bills Committee.

Note: print and electronic submissions to the Public Bills Committee are public documents and are posted on the Nova Scotia Legislature website following the hearing of the bill. The Nova Scotia House of Assembly cannot be held responsible for redacting all personal information from these submissions.



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From: Lori Arnold <lori@macinteriordesign.com>

Sent: March 14, 2025 5:00 PM

To: Office of the Legislative Counsel <legc.office@novascotia.ca>

Subject: FW: Letter of Concern Bill 36 Labour and Mobility Within Canada Act from IDNS

Good afternoon

Please find attached a letter of concern which the Interior Designers of Nova Scotia have sent to Premier Houston in regards to Bill 36 Labour and Mobility within Canada Act.

I have reached out at 902 424-8941.

Regards

Lori Arnold
IDNS President



Interior Designers of Nova Scotia
PO Box 2042, Halifax, NS, B3J 2Z1, Canada
www.idns.ca

Interior Designers of Nova Scotia – Bill 36 Speaking Notes

My name is Lori Arnold. I am representing The Interior Designers of Nova Scotia. We are the professional **regulator** of the interior design profession in Nova Scotia. As the public interest regulator of the Nova Scotia Interior Designers Act in Nova Scotia, we are here with significant concerns regarding the impacts of Bill 36 - *Free Trade and Mobility within Canada Act*.

As a regulatory body, we are directly impacted by this proposed legislation. The primary role of the Interior Designers of Nova Scotia is to ensure the **protection of the public** by ensuring only those with the necessary education, training, and examination are allowed to practise interior design and use the protected title “interior designer”. We are responsible, **by law**, for safeguarding Nova Scotians who access interior design services and occupy interior environments.

We truly appreciate this Government’s efforts to facilitate interprovincial trade. Nova Scotia is rightfully recognized as a leader in this area. However, the reality is that interior designers are not commodities, like beer or wine. **Interior Design is not about décor or embellishment of spaces.** The practice of professions, such as interior design involves **significant risks to the public** if not properly regulated. Interior Designers of Nova Scotia members are responsible for the design of **hundreds of millions of dollars** of commercial spaces throughout Nova Scotia. These are the spaces that all of us frequent on a daily basis. Interior designers are responsible for the renovation and fit ups of interior environments such as airports, shopping malls and retail stores, daycares and schools, recreational facilities, correctional facilities, medical facilities, theatres, bars, restaurants, libraries, courthouses, dental clinics, offices, hotels, spas, and on. The Interior Designers of Nova Scotia are designing these spaces from the ‘ground up’. We are space planning, designing and detailing the ceiling, floor, wall, lighting and door systems. We are specifying the finishes, furnishings and designing the millwork cabinetry and creating the technical drawings required to price, construct and obtain a building permit. In addition to ensuring that minimum building code requirements are met in all aspects of our work, we also consider things like, acoustics, slip resistance, technology integration, indoor air quality in material selection, infection control measures, material safety, food safety, flammability of materials and furnishings, accessibility and inclusivity, ergonomics, anthropometrics, productivity, neurodiversity, and the list goes on. *And yes, when we are done considering all of these elements, the spaces we design are also beautiful.*

Bill 36, as currently drafted, will significantly **erode** the Interior Designers of Nova Scotia’s ability to protect the public in the practice of interior design. As currently drafted, Bill 36 permits a person “who has met the requisite standards and approvals” in a reciprocating Canadian province or territory to be automatically considered “as if” they were registered in Nova Scotia here, **without any requirements whatsoever.**

Effectively, Bill 36 permits an interior designer from another province or territory to practice in Nova Scotia without having to:

- register with the Association;
- maintain professional liability insurance;
- vet their professional conduct history;
- practice in accordance with IDNS’ standards of practice; or
- meet minimum competency standards.

It is wholly inconsistent with the public interest to allow an interior designer from another province or territory to provide services in Nova Scotia without any consideration of the interior designer's character, competence, or capacity.

As drafted, Bill 36 will deprive Nova Scotians harmed by an interior designer from another province or territory from filing a complaint with the Interior Designers of Nova Scotia. This moves the Association backwards in its ability to address vital issues such as accessibility, accountability, and trust in our systems and services.

On the issue of trust, only members of the IDNS are permitted to use an interior designer's seal in Nova Scotia. The enduring privilege and trust associated with the seal will be irreparably harmed by Bill 36. As currently drafted, Bill 36 will allow any interior designer from a reciprocating Canadian province or territory to use a seal regardless of their education, training, or competence. The Nova Scotia Building Code Regulations provide Letters of Undertaking (LOU) for each of the design disciplines Professional Engineers, Licensed Architects and Registered Interior Designers. These LOU documents are required by the municipal Authority Having Jurisdiction (AHJ) when making an application for a Building Permit under Part 3 of the National Building Code. The AHJ requires that each LOU document bears the seal of the NS professional entrusted to monitor the implementation of the design drawings or a temporary license issued by the regulator of the design discipline. *Who will take responsibility for compliance to building codes?*

The Interior Designers of Nova Scotia are **especially concerned** about Bill 36 given that, unlike our other professional counterparts in architecture and engineering, the practice of interior design is **NOT regulated in all provinces**. Nova Scotia, New Brunswick and Alberta are currently the **only** provinces in Canada with interior design practice act legislation. **All other provinces do not allow interior designers to seal drawings or apply for building permits in their residing province yet this proposed legislation would seemingly afford them the ability to do so in Nova Scotia and thereby grant them a 'back door' entry while undermining Nova Scotia's established professional standards of competency.**

Nova Scotia is presently experiencing a housing crisis and commercial construction boom. Construction projects are being completed at a frantic pace. This government sees the importance of **strengthening** accessibility, energy, and safety standards which is evident in the upcoming amendments to the Nova Scotia Building Code and the provinces new Accessibility Act that begin to take effect on April 1st. In our view, this **NOT** the time to reduce public interest oversight of interior designers involved in such projects. The Interior Designers of Nova Scotia have an important role in ensuring Nova Scotians continue to receive competent services from interior designers now and well into the future. Allowing interior designers who do **NOT** have knowledge of Nova Scotia Building Codes or the qualifications to ensure compliance with fire, energy, and the life safety elements involved in designing interior spaces that service Nova Scotians is a **significant** concern. *What recourse will the public have if something goes wrong? Who will be responsible to ensure that the hundreds of million dollars that hardworking Nova Scotians are investing in their spaces will be safe, secure, and protect their health and wellbeing?*

The Association recognizes the importance of labour mobility and relies on the provisions of the *Canadian Free Trade Agreement* and the *Fair Registration Practices Act* to act expeditiously to recognize valid extra-provincial credentials. These existing processes already allow for mobility without compromising trust, professional integrity, and the delivery of high-quality services.

Nova Scotia and the Interior Designers of Nova Scotia **are recognized leaders** across Canada and throughout North America in understanding the critical role that interior designers play in ensuring the protection of the public within our built spaces. Bill 36 opens the door to uninsured and unqualified interior designers practising in Nova Scotia without regulatory oversight. Regardless of the intent of Bill 36, such a situation is untenable and grossly contrary to the safety of Nova Scotians. By eliminating the Association's ability to regulate interior designers who offer services in Nova Scotia, Bill 36 critically undermines the Association's ability to fulfill its mandate.

The Interior Designers of Nova Scotia urge this committee to reconsider the wording of Bill 36 and its consequences to ensure the **safety and protection** of all Nova Scotians. Nova Scotians have a right to ensure that the interior spaces that they inhabit, visit, and occupy are **ALWAYS designed to protect their health, safety, and wellbeing**.

Lori Arnold, President IDNS



Interior Designers of Nova Scotia

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Interior Designers of Nova Scotia

March 13, 2025

VIA EMAIL: premier@novascotia.ca

The Honourable Tim Houston
One Government Place
1713 Barrington Street
Halifax, Nova Scotia B3J 2A4

Dear Premier Houston,

As the public interest regulator of the interior design profession in Nova Scotia, we write with significant concerns regarding the impacts of Bill 36 - Free Trade and Mobility within Canada Act.

The Interior Designers of Nova Scotia (the "IDNS") is the professional regulator of the interior design profession in Nova Scotia. IDNS is established pursuant to the Interior Designers Act, SNS 2003, c 6. Since 1975, IDNS has promoted and supported both the interests of the public and the interior design profession. Interior Design is not about décor or embellishment of spaces.

As a regulatory body, we are directly impacted by this proposed legislation. Therefore, we were disappointed to learn about Bill 36 through the media, rather than consultation with government. We feel as though meaningful consultation regarding this legislation would have prevented several of the issues identified below.

One of our most important roles is ensuring the protection of the public by ensuring only those with the necessary education, knowledge, skill, and training and examination are allowed to practice interior design and use the protected title "interior designer". In other words, IDNS is responsible, by law, for safeguarding Nova Scotians who access interior design services and occupy interior environments.

We truly appreciate this Government's efforts to facilitate interprovincial trade. Nova Scotia is rightfully recognized as a leader in this area. However, the reality is that interior designers are not commodities, like beer or wine. In our respectful view, the practice of professions such as interior design involves risks to the public if not properly regulated. We are responsible for all aspects of the fit up of interior environments such as airports, shopping malls, schools, recreational facilities, correctional facilities, medical facilities, theatres, bars, restaurants, libraries, courthouses, dental clinics, offices and on. In addition to ensuring minimum building code requirements are met, we also consider things like acoustics, technology integration, indoor air quality in material selection, infection control measures, material safety, food safety, flammability of materials and furnishings, inclusivity, accessibility, ergonomics, anthropometrics, productivity, neurodiversity and the list goes on.

Bill 36, as currently drafted, will significantly erode IDNS' ability to protect the public in the practice of interior design. As currently drafted, Bill 36 permits a person "who has met the requisite standards and approvals" in a reciprocating Canadian province or territory to be automatically considered "as if" they were registered in Nova Scotia here, without any requirements whatsoever.

Effectively, Bill 36 permits an interior designer from a reciprocating another province or territory to practice in Nova Scotia without having to:

- register with the Association;
- maintain professional liability insurance;
- vet their professional conduct history; or
- practice in accordance with IDNS' standards of practice
- meet minimum competency standards

It is wholly inconsistent with the public interest to allow an interior designer from a reciprocating another province or territory to provide services in Nova Scotia without any consideration of the interior designer's character, competence, or capacity.

Bill 36 opens the door to uninsured and unqualified interior designers practicing in Nova Scotia without regulatory oversight. Regardless of the intent of Bill 36, such a situation is untenable and grossly contrary to the safety of Nova Scotians. who access interior design services.

As drafted, Bill 36 will deprive Nova Scotians harmed by an interior designer from another reciprocating province or territory from filing a complaint with the IDNS. This moves the Association backwards in its ability to address vital issues such as accessibility, accountability, and trust in our systems and services.

On the issue of trust, only members of the IDNS are permitted to use an interior designer's seal in Nova Scotia. The enduring privilege and trust associated with the seal will be irreparably harmed by Bill 36. As currently drafted, Bill 36 will allow any interior designer from a reciprocating Canadian province or territory to use a seal regardless of their education, training, or competence.

The Nova Scotia Building Code Regulations provide Letters of Undertaking (LOU) for each of the design disciplines Professional Engineers, Licensed Architects and Registered Interior Designers. These LOU documents are required by the municipal Authority Having Jurisdiction (AHJ) when making an application for a Building Permit under Part 3 of the National Building Code. The AHJ requires that each LOU document bears the seal of the NS professional entrusted to monitor the implementation of the design drawings or a temporary license issued by the regulator of the design discipline.

This is especially concerning given that Nova Scotia, New Brunswick and Alberta are currently the only provinces in Canada with interior design practice act legislation. All other provinces do not currently allow their interior designers to seal drawings or apply for building permits in their own residing provinces.

Nova Scotia is presently experiencing a housing crisis and commercial construction boom. Construction projects are being completed at a frantic pace. Your own government sees the importance of strengthening accessibility, energy, and safety standards which is evident in the upcoming amendments to the Nova Scotia Building Code and the province's new Accessibility Act that begin to take effect April 1, 2025. In our view, this not the time to reduce public interest oversight of interior designers involved in such projects. IDNS has an important role in ensuring Nova Scotians continue to receive competent services from interior designers now and well into the future. Allowing interior designers who do not have knowledge of Nova Scotia Building Codes or the qualifications to ensure compliance with fire, energy, and the life safety elements involved in designing interior spaces that service Nova Scotians is a significant concern for IDNS. Who will take responsibility for compliance to building codes? What recourse will the public have if something goes wrong?

The Association recognizes the importance of labour mobility and relies on the provisions of the Canadian Free Trade Agreement and the Fair Registration Practices Act to act expeditiously to recognize valid extra-provincial credentials. These existing processes already allow for mobility without compromising trust, professional integrity, and the delivery of high-quality services.

By eliminating the Association's ability to regulate interior designers who offer services in Nova Scotia, but are registered in reciprocating provinces and territories, Bill 36 critically undermines the Association's ability to fulfill its mandate.

The IDNS urges you to reconsider the wording of Bill 36 and its consequences as outlined above now, as we are not confident that they can be adequately addressed simply through regulation.

We would be pleased to discuss our concerns further with you.

I can be reached by contacting (902) 425-4959 or president@idns.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori Arnold". The signature is written in a cursive style with a large, sweeping initial "L".

Lori Arnold

President

Interior Designers of Nova Scotia

CC: Nova Scotia Public Bills Committee