

April 22, 2026

Hon. Ravi Parmar
Minister of Forests
PO Box 9049 Stn Prov Govt
Victoria, BC V8W 9E2
Sent by email: EngageHCA@gov.bc.ca

Re: Association of Interior REALTORS® Response to the Heritage Conservation Act Transformation Project

The Association of Interior REALTORS® appreciates the opportunity to provide feedback to inform the priorities of the Ministry of Forests as it relates to the Heritage Conservation Act Transformation Project (HCATP).

We are a professional association representing approximately 2600 professional REALTORS® that live and work across the interior region of British Columbia. Our submission reflects the position of REALTORS®, managing brokers across the interior of British Columbia, and is aligned with other real estate boards and associations across the province.

We wish to express our appreciation that the Ministry team has listened to concerns regarding intangible heritage, heritage management zones, the need for plain language guidance materials, and the need for adequate resourcing and staffing to implement the proposed changes.

We appreciate the commitment to future consultation with the real estate industry and welcome the opportunity to provide continued input on future regulations.

The following outlines our remaining concerns with the proposed amendments and highlights challenges our membership have identified in the recently released technical policy paper. We have made policy recommendations and proposed alternatives where applicable.

Heritage Information Checks

Our position remains that regulations regarding mandatory heritage information checks would present a significant challenge for consumers transacting property. With over 15,737 sales in the interior of the province last year alone and a considerable lack of archaeologists, mandatory heritage information checks would create an inefficient, unnecessary burden on property transactions. We recommend that the Ministry does not proceed with mandatory heritage information checks at time of sale.

That said, if the Ministry chooses to move forward with mandatory heritage information checks in regulation it should be done through the use of an easy-to-use mapping tool such as LTSA's AutoProp. Having areas with heritage significance depicted on AutoProp, a subscription-based property information service accessible only to real estate professionals would allow the ministry to achieve their goal of heightening public awareness about archaeological sites on private property while also respecting the privacy concerns identified by First Nations.

It should also be noted that any regulation made in this regard be done so in conjunction with BC Financial Services Authority to ensure no undue regulation or legal liability is put on REALTORS® or their clients.

Clarification of Ground Disturbance

The technical policy paper explicitly mentions that heritage information checks will only be necessary for “property sales that involve ground disturbance”. That said, no definition is provided. An example is given that a third-floor apartment would not be subject to a heritage information check, what about a ground floor condo? A town home? A single-family home where no work is planned on the yard or structure? Bare Land?

Even with a reasonable assumption of ground disturbance, such as a home sold in a land assembly to be redeveloped, a heritage information check at a time of sale would be unnecessary considering it would be done by the municipality prior to issuing development or building permits

If legislation proceeds without first defining ground disturbance, it will mean a significant increase in liability for REALTORS® and confusion for consumers.

It is necessary that any changes provide explicit definitions on what constitutes ground disturbance in legislation, especially if the intent is to use this criterion as an indicator for which properties will be subject to information checks at time of sale.

Associated Costs with Rural Sales

As mentioned in the technical policy paper, the Ministry has acknowledged the lack of readily available archaeologists and has provided alternative methods of obtaining a Heritage Information Check. If timelines for free heritage information checks through the province become too prohibitive, then buyers or sellers with more urgent needs will be forced to pay a significant amount of money for a third-party consulting archaeologist. This is especially burdensome in rural communities where fewer third-party consulting archaeologists means higher costs.



To ensure fairness for rural consumers, any mandatory heritage information checks should only be done after the Ministry has committed to increasing staff archaeologists to implement free heritage information checks in a timely fashion or a free mapping tool is created.

Summary of Recommendations:

- 1.) Do not proceed with mandatory heritage information checks at time of sale.
- 2.) Ensure that any mandatory heritage information checks are done through a free, easy-to-use mapping tool or database.
- 3.) Ensure that any regulations are made in conjunction with the real estate industry, BCFSA, and other industry stakeholders to ensure no undue regulatory burden on legal liability is placed on REALTORS® or consumers.
- 4.) Provide explicit definitions on what constitutes ground disturbance in legislation.
- 5.) Ensure fairness for consumers in rural communities of the province.

Thank you for all that you do and taking our concerns into consideration. If you have any further questions or queries regarding this important topic, please reach out to Seth Scott, Director of Government Relations and Communications at seths@interiorrealtors.com or (250) 491-4560 ext.252.

Best Regards,

Seth Scott
Director of Government Relations and Communications
Association of Interior REALTORS®