

October 14, 2025

Sharat Chandra
Vice President, Planning, transformation and Infrastructure
Fraser Health Authority
Suite 400, Central City Tower
13450 – 102nd Avenue Surrey, BC V3T 0H1

Re: Procurement Practice Review - Project Number K100-00 - Chilliwack General Hospital; 8272/DJP Tower Roofs

Dear Mr. Chandra,

On behalf of the International Institute of Building Enclosure Consultants (IIBEC), I am writing regarding the procurement process for Project K100-00 – Chilliwack General Hospital / 8272 DJP Tower Roofs. IIBEC is a professional association of design experts specializing in roofing, exterior wall, and waterproofing systems. Our members act as advocates for building owners, ensuring that projects comply with codes, standards, warranties, and performance requirements.

This letter is intended to provide recommendations to enhance the bidding process and protect the interests of the Fraser Health Authority (FHA), the public, and bidders, and is not a challenge to any specific project. IIBEC's 3,900 members worldwide, including 800 in the IIBEC community in Canada, adhere to a strict Code of Ethics that prioritizes the safety, health, and welfare of the public.

Our assessment indicates that the referenced project was executed without independent professional design and relied on a single-source procurement approach. Such methods bypass established safeguards, may conflict with provincial procurement regulations, and may lead to increased cost.

IIBEC recommends that future contract documents be scrutinized to ensure that all the products included are available from multiple sources to avoid breaching the New West Partnership publication, Guidelines to the Procurement Obligations of Domestic and International Trade Agreements. In this case, specifically Part B (V)(1)(c) using a technical specification or conformity assessment procedure with the purpose or effect of creating unnecessary obstacles to trade would be considered inconsistent with the openness, non-circumvention, non-discrimination, or transparency obligations.

Avoiding sole-source specifications is particularly critical in publicly funded projects. Sole-source procurement limits competition increases costs and creates potential conflicts of interest. Competitive bidding ensures transparency, promotes efficiency, and



supports cost-effective outcomes, benefits that are forfeited under sole-source arrangements. When a sole source has a financial interest in the project, design decisions, material selection, or construction methods may be influenced by profit rather than the project's best interests. Independent professional oversight and open, competitive processes are essential to mitigate these risks. Furthermore, sole-source specifications can restrict innovation and prevent consideration of superior alternatives from other qualified vendors. Evaluating multiple solutions ensures the best technical fit, highest quality, and optimal lifecycle performance for the project.

IIBEC strongly advocates for the use of independent design consultants with no financial interest in specified products on publicly funded projects. This approach protects all parties from perceived conflicts of interest and ensures that roofing and building enclosure systems are designed to meet the building's specific needs. Independent oversight also aligns with the New West Partnership Guidelines, which prohibit procurement advice from individuals with commercial interests that could limit competition.

We have observed instances where projects were delivered through manufacturer-led design-build models, which routinely eliminate independent design services and can compromise material selection, quality, and value. This approach may also be against provincial procurement regulations. According to the IIBEC Code of Ethics, such arrangements create inherent conflicts of interest for design consultants.

Leading procurement authorities and long considered the gold-standard for procurement programs, the American Bar Association (ABA) 2000 Model Procurement Code for State and Local Governments¹ and the Public Construction Council of BC's Guidelines for Construction Delivery, do not recognize manufacturer-design-build approaches as acceptable public procurement methods.

To protect the integrity of procurement and ensure best value, IIBEC recommends:

1. **Affidavit of Independence** – Require all consulting or professional services providers to certify that they will not receive compensation from any other source related to the project.
2. **Conflict of Interest Affidavit** – Require all providers to certify that they do not supply, manufacture, or distribute materials or bid on construction services related to the project.
3. **Use of Credentialed Professionals** – Require involvement of IIBEC credentialed professionals (RBEC®, RRC®, RWC®, REWC®, RRO®),

¹ <https://publicprocurementinternational.com/wp-content/uploads/2019/04/2000-ABA-Model-Procurement-Code.pdf>



REWO®) or independent licensed professionals (engineers or architects) to ensure design and construction quality, code compliance, and warranty adherence. The requirements for attaining these designations are stringent and take considerable time and effort to fulfill. The Registered Roof Observer (RRO®) and Registered Exterior Wall Observer (REWO®) programs qualify individuals to monitor the construction process to ensure that roof and exterior wall projects stay in compliance with approved construction drawings, specifications, and best practice or warranty-stipulated installation procedures.

We strongly recommend that your team implement independent review and competitive procurement measures on all future projects. Aligning with these standards will reduce risk, enhance transparency, and safeguard both performance and public trust.

We are available to discuss guidance from the IIBEC analysis and support measures to strengthen procurement practices. Please let us know a convenient time to connect.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian", with a stylized flourish at the end.

Brian Pallasch,
Executive Vice President & CEO

