



COUNCIL REPORT

Report Date: September 10, 2024
Contact: Sarah Hicks
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VanRIMS No.: 08-2000-20
Meeting Date: September 25, 2024
[Submit comments to Council](#)

TO: Standing Committee on Policy and Strategic Priorities
FROM: Chief Licence Inspector
SUBJECT: Expanding the Metro West Inter-Municipal Business Licence to Include Health Care Professionals and Services

Recommendations

- A. THAT Council approve, in principle, the inclusion of health care professionals and services providing in-home care as businesses eligible for the Metro West Inter-Municipal Business Licence (IMBL);

FURTHER THAT the Director of Legal Services bring forward for enactment the by-laws necessary to include health care professionals and services providing in-home care as businesses eligible for the Metro West IMBL generally in accordance with by-laws attached in Appendix A and Appendix B, to be effective January 1, 2025.

- B. THAT Council approve, in principle, an increase to the annual fee for the Metro West IMBL from \$250 to \$300;

FURTHER THAT the Director of Legal Services bring forward for enactment the necessary by-laws generally in accordance with by-laws attached in Appendix A and Appendix B, to be effective January 1, 2025.

Purpose and Executive Summary

This report recommends adding health care professionals and services to the Metro West IMBL program so that businesses providing in-home health care and related services can operate in Vancouver, Burnaby, Delta, New Westminister, Richmond and Surrey with one licence. Under the program, the IMBL is purchased from a business' home municipality through a top-up fee on their municipal business licence. The report also recommends increasing the Metro West IMBL fee from \$250 to \$300 effective January 1, 2025.

If approved, these recommendations will reduce administrative and cost burdens for businesses providing in-home health care and related services operating in multiple partner municipalities.

Currently the Metro West IMBL is open to trades and construction related businesses, and to businesses that repair and maintain land and buildings outside their home municipalities. Expanding the IMBL to include home health care professionals and services will contribute to greater regional coordination and promotion of a welcoming business climate.

The annual fee for the Metro West IMBL has not changed since 2013. If approved, the increase from \$250 to \$300 will bring IMBL fees more in line with other licensing fees that have increased over the years to cover municipal cost escalation.

Changes to the Metro West IMBL require approval from all participating municipalities. Staff from each participating municipality will be bringing the recommendations in this report to their Councils for approval in Q4 2024. Should the recommendations be approved by all participating municipalities, the Metro West IMBL will be available to health care professionals and services businesses on January 1, 2025, and the fee for all IMBL licence holders will be \$300.

Health care professionals and services businesses will be notified of the new licence opportunity through mail and email, social media channels and the City's website. Current holders of the IMBL will see the amended licence fee on their 2025 licence renewal notices.

Council Authority/Previous Decisions

- On [June 25, 2013](#) Council approved the City of Vancouver's participation in a two-year pilot of the "Metro West" Inter-municipal Business Licence program with the City of Burnaby, the Corporation of Delta, the City of New Westminster, the City of Richmond and the City of Surrey. Eligible businesses were trades contractors and other professionals related to the construction industry.
- On [December 1, 2015](#) Council approved the City of Vancouver's participation as a permanent partner of the Metro West Inter-municipal Business Licence (IMBL) program. Business eligibility for the licence was expanded to include businesses that perform maintenance, repair and/or inspections of land and buildings.
- On [May 10, 2023](#) Council directed staff to explore the establishment of an inter-municipal business licence for home healthcare support workers.

City Manager's Comments

The City Manager concurs with the foregoing recommendations.

Context and Background

Inter-municipal business licences (IMBLs) support dynamic local and regional economies. They reduce administrative and cost burdens by allowing eligible businesses to operate in multiple partner municipalities with the purchase of a single licence. The terms and conditions of an IMBL including the fee and licence administration are set out in a set of common bylaws enacted by each participating municipality. In BC there are 17 IMBL partnerships between 104

municipalities. Consumers can benefit from increased choice as businesses expand services across participating municipalities.

The City of Vancouver participates in the Metro West IMBL program which launched as a pilot in 2013 for businesses in the construction industry to operate in Vancouver, Burnaby, Delta, New Westminster, Richmond, and Surrey. In 2015 the participating municipalities agreed to make the IMBL permanent, and to add businesses that repair, inspect and maintain land and buildings (for example arborists, building inspectors and janitors) to the program. Under provisions of the IMBL agreement, businesses must obtain a business licence in their home municipality (the municipality where they maintain business premises) and for an additional fee, they get the IMBL. A condition of the IMBL is that businesses are required to comply with relevant by-law conditions of each municipality in which they work.

The IMBL fee was set at \$250 in 2013 and a revenue sharing agreement among the participating municipalities was established. In 2015 the revenue sharing agreement was simplified from one based on the proportionate share of each municipality's non-resident licence revenue, to one in which each municipality retains 90% of its IMBL revenue and distributes the remaining 10% evenly among the other partners.

Uptake of the IMBL has been steady. Since 2015 the annual number issued has increased seventeen-fold. In 2023 a total of 6,817 IMBLs were issued by participating municipalities with 1,479 issued by Vancouver.

Staff have explored an IMBL for home health care support workers and propose that the Metro West IMBL program be expanded to include these businesses.

Discussion

Businesses that provide home healthcare and other in-home support services are good candidates for the Metro West IMBL. Many serve clients in multiple Metro Vancouver municipalities providing services that include in-home medical care, transportation, companionship, and home making.

The City of Vancouver issues about seventy-five business licences each year to businesses whose core work is to provide in-home health care and nursing services. In addition, the City issues about three thousand licences annually to health care businesses that could provide in-home services as part of their business. These include midwifery, registered massage therapy, and counselling services, among others. Staff propose to expand the IMBL definition of an "inter-municipal business" to include home care and nursing, and other health care professionals and services when the services are provided in the client's home (Appendix A).

IMBL Annual Fee

When the Metro West IMBL pilot launched in 2013, the \$250 annual fee was deemed appropriate to yield overall revenue neutrality for the program. In the years since, while other City business licence fees have been adjusted annually, the IMBL fee which requires approval from all six participating municipalities, has remained unchanged. Financial analysis suggests that increasing the fee from \$250 to \$300 will help to offset cost escalation experienced by participating municipalities over the last ten years.

Financial Implications

Staff expect that including health care professionals and services to the Metro West IMBL will not have a financial impact on the City. Any revenue lost as a result of out-of-town businesses switching from a Vancouver issued licence to an IMBL purchased from their home municipality, will be offset by revenue from Vancouver based businesses purchasing the IMBL from Vancouver. Furthermore, the revenue sharing protocol of the Metro West IMBL ensures that all participating municipalities receive a portion of the total revenues from licences issued.

Increasing the annual fee for the IMBL by \$50 is expected to generate approximately \$66,000 in new revenue for the City in 2025.

Risks

Staff from each Metro West IMBL municipality will present the recommendations in this report to their respective Councils for approval in Q4 of 2024. As the IMBL requires common by-laws, recommendations must be approved without amendments by all six participating municipalities. If any municipality does not approve the recommended by-laws, the agreement cannot be executed, and health care professionals and services businesses will not be eligible for the Metro West IMBL.

Stakeholder Feedback

Staff met with the BC Care Providers Association and with business owners. Staff heard unanimous support for the proposal to include businesses that provide in-home health care and related services in the Metro West IMBL program. Staff heard that the reduced administrative and cost burdens will be welcome for businesses that already operate in two or more municipalities; may encourage and enable eligible businesses to expand their service areas; and can benefit clients who may see increased service options.

Implementation

Should the recommendations be approved by all participating municipalities, the Metro West IMBL will be available to health care professionals and services businesses on January 1, 2025, and the fee for all IMBL licence holders will be \$300.

Healthcare professionals and services businesses will be notified of the IMBL opportunity by mail/email, through social media channels and the City's website. Existing IMBL licence holders will see the new fee reflected in their 2025 renewal notices.

Financial Implications

Staff anticipate the recommendations in this report to be revenue neutral for the City.

Legal Implications

None.

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APPENDIX A
**A By-law to enter into an agreement among the City of Burnaby,
the City of Delta, the City of New Westminster, the City of
Richmond, the City of Surrey, and the City of Vancouver (the
"Participating Municipalities") regarding an Inter-municipal
Business Licence Scheme**

THE COUNCIL OF THE CITY OF VANCOUVER, in public meeting, enacts as follows:

1. Council hereby authorizes the City to enter into an Agreement with the City of Burnaby, the City of Delta, the City of New Westminster, the City of Richmond, the City of Surrey, and the City of Vancouver, in substantially the form and substance of the Agreement attached to this by-law as Schedule A, and also authorizes the Director of Legal Services to execute the agreement on behalf of the City, and to deliver it to the Participating Municipalities on such terms and conditions as the Director of Legal Services deems fit.
2. This by-law is to come into force and take effect upon enactment.
3. This by-law is to be cited as the "Inter-municipal Business Licence Agreement By-law".

ENACTED by Council this day of , 2024

Mayor

City Clerk

Schedule A

INTER-MUNICIPAL BUSINESS LICENCE AGREEMENT

WHEREAS the City of Burnaby, the City of Delta, the City of New Westminster, the City of Richmond, the City of Surrey, and the City of Vancouver (hereinafter the "Participating Municipalities") wish to permit certain categories of Businesses to operate across their jurisdictional boundaries while minimizing the need to obtain a separate municipal business licence in each jurisdiction;

NOW THEREFORE the City of Burnaby, the City of Delta, the City of New Westminster, the City of Richmond, the City of Surrey, and the City of Vancouver agree as follows:

1. The Participating Municipalities agree to establish an inter-municipal business licence scheme among the Participating Municipalities, pursuant to section 14 of the Community Charter and section 192.1 of the Vancouver Charter.

2. The Participating Municipalities will request their respective municipal Councils to each ratify this Agreement and enact a by-law to implement an inter-municipal business licence scheme effective January 1, 2025.

3. In this Agreement:

"Business" has the meaning in the Community Charter;

"Community Charter" means the Community Charter, S.B.C. 2003, c.26;

"Inter-municipal Business" means any of the following businesses that provide services outside of their Principal Municipality:

- (a) a trades contractor or other professional related to the construction industry;
- (b) a contractor who performs maintenance, repair and/or inspections of land and buildings; and
- (c) a health care professional or a health care service provider who provides services by visiting clients in their homes;

"Inter-municipal Business Licence" means a business licence which authorizes an Inter-municipal Business to be carried on within the jurisdictional boundaries of any or all of the Participating Municipalities;

"Inter-municipal Business Licence By-law" means the by-law adopted by the Council of each Participating Municipality to implement the inter-municipal business licence scheme contemplated by this Agreement;

"Municipal Business Licence" means a licence or permit, other than an Inter-municipal Business Licence, issued by a Participating Municipality that authorizes a Business to be carried on within the jurisdictional boundaries of that Participating Municipality;

"Participating Municipality" means any one of the "Participating Municipalities";

“Person” has the meaning in the Interpretation Act, R.S.B.C. 1996, c. 238;

“Premises” means one or more fixed or permanent locations where the Person ordinarily carries on Business;

“Principal Municipality” means the Participating Municipality where a Business is located or has Premises; and

“Vancouver Charter” means the Vancouver Charter, S. B.C. 1953, c.55.

4. Subject to the provisions of the Inter-municipal Business Licence By-law, the Participating Municipalities will permit a Person who has obtained an Inter-municipal Business Licence to carry on Business within any Participating Municipality for the term authorized by the Inter-municipal Business Licence without obtaining a Municipal Business Licence in the other Participating Municipalities.

5. A Principal Municipality may issue an Inter-municipal Business Licence to an applicant if the applicant is an Inter-municipal Business and meets the requirements of the Inter-municipal Business Licence By-law, in addition to the requirements of the Principal Municipality's by-law that applies to a Municipal Business Licence.

6. Notwithstanding that a Person may hold an Inter-municipal Business Licence that would make it unnecessary to obtain a Municipal Business Licence in other Participating Municipalities, the Person must still comply with all other regulations of any municipal business licence by-law or regulation in addition to any other by-laws that may apply within any jurisdiction in which the Person carries on Business.

7. An Inter-municipal Business Licence must be issued by the Participating Municipality in which the applicant maintains Premises.

8. The Participating Municipalities will require that the holder of an Inter-municipal Business Licence also obtain a Municipal Business Licence for Premises that are maintained by the licence holder within the jurisdiction of a Participating Municipality.

9. The Inter-municipal Business Licence fee is \$300 and is payable to the Principal Municipality.

10. The Inter-municipal Business Licence fee is separate from and in addition to any Municipal Business Licence fee that may be required by a Participating Municipality.

11. Despite section 15, the Inter-municipal Business Licence fee will not be pro-rated.

12. The Participating Municipalities will distribute revenue generated from Inter-municipal Business Licence fees amongst all Participating Municipalities based on the Principal Municipality retaining 90% of the Inter-municipal Business Licence fee and the remaining 10% distributed equally to the remaining Participating Municipalities.

13. The Participating Municipalities will review the Inter-municipal business licence scheme and the revenue sharing formula established by this Agreement from time to time and may alter the formula in section 12 by written agreement of all Participating Municipalities.
14. The revenue generated from Inter-municipal Business Licence fees collected from January 1 to December 31 inclusive that is to be distributed to other Participating Municipalities, in accordance with section 12, will be distributed by February 28 of the year following the year in which fees were collected. The Participating Municipalities will designate one municipality, which may change from time to time, to calculate and distribute the revenue generated from Inter-municipal Business Licence fees.
15. The length of term of an Inter-municipal Business Licence is twelve (12) months, except that, at the option of a Principal Municipality, the length of term of the initial Inter-municipal Business Licence issued to an Inter-municipal Business in that municipality may be less than twelve (12) months in order to harmonize the expiry date of the Inter-municipal Business Licence with the expiry date of the Municipal Business Licence.
16. An Inter-municipal Business Licence will be valid within the jurisdictional boundaries of all of the Participating Municipalities until its term expires, unless the Inter-municipal Business Licence is suspended or cancelled or a Participating Municipality withdraws from the inter-municipal business licence scheme among the Participating Municipalities in accordance with the Inter-municipal Business Licence By-law.
17. Each Participating Municipality will share a database of Inter-municipal Business Licences, which will be available for the use of all Participating Municipalities.
18. Each Participating Municipality which issues an Inter-municipal Business Licence will promptly update the shared database after the issuance of that licence.
19. A Participating Municipality may exercise the authority of the Principal Municipality and suspend an Inter-municipal Business Licence in relation to conduct by the holder within the Participating Municipality which would give rise to the power to suspend a business licence under the Community Charter or Vancouver Charter or under the business licence by-law of the Participating Municipality. The suspension will be in effect throughout all of the Participating Municipalities and it will be unlawful for the holder to carry on the Business authorized by the Inter-municipal Business Licence in any Participating Municipality for the period of the suspension.
20. A Participating Municipality may exercise the authority of the Principal Municipality and cancel an Inter-municipal Business Licence in relation to conduct by the holder within the Participating Municipality which would give rise to the power to cancel a business licence under the Community Charter or Vancouver Charter or the business licence by-law of the Participating Municipality. The cancellation will be in effect throughout all of the Participating Municipalities.
21. The cancellation of an Inter-municipal Business Licence under section 20 will not affect the authority of a Participating Municipality to issue a business licence, other than an Inter-municipal Business Licence, to the holder of the cancelled Inter-municipal Business Licence.

22. Nothing in this Agreement affects the authority of a Participating Municipality to suspend or cancel any business licence issued by that municipality or to enact regulations in respect of any category of Business under section 15 of the Community Charter or sections 272, 273, 279A, 279A.1, 279B, and 279C of the Vancouver Charter.

23. A Participating Municipality may, by notice in writing to each of the other Participating Municipalities, withdraw from the inter-municipal business licence scheme among the Participating Municipalities, and the notice must:

- (a) set out the date on which the withdrawing municipality will no longer recognize the validity within its boundaries of Inter-municipal Business Licences, which date must be at least six months from the date of the notice; and
- (b) include a certified copy of the municipal Council resolution or by-law authorizing the municipality's withdrawal from the Inter-municipal Business Licence scheme.

24. Prior to the effective date of a withdrawal under section 23 of this Agreement, the remaining Participating Municipalities will review and enter into an agreement to amend the revenue distribution formula set out in section 12 of this Agreement.

25. Nothing contained or implied in this Agreement shall fetter in any way the discretion of the Council of the Participating Municipalities. Further, nothing contained or implied in this Agreement shall prejudice or affect the Participating Municipalities' rights, powers, duties or obligation in the exercise of its functions pursuant to the Community Charter, Vancouver Charter, or the Local Government Act, as amended or replaced from time to time, or act to fetter or otherwise affect the Participating Municipalities' discretion, and the rights, powers, duties and obligations under all public and private statutes, by-laws, orders and regulations, which may be, if each Participating Municipality so elects, as fully and effectively exercised as if this Agreement had not been executed and delivered by the Participating Municipalities.

26. Despite any other provision of this Agreement, an Inter-municipal Business Licence granted in accordance with the Inter-municipal Business Licence By-law does not grant the holder a licence to operate in any jurisdiction other than within the jurisdictional boundaries of the Participating Municipalities. Furthermore, a business licence granted under any other inter-municipal business licence scheme is deemed not to exist for the purposes of this Agreement even if a Participating Municipality is a participating member of the other inter-municipal business licence scheme.

27. This Agreement may be executed in several counterparts, each of which shall be deemed to be an original. Such counterparts together shall constitute one and the same instrument, notwithstanding that all of the Participating Municipalities are not signatories to the original or the same counterpart.

28. This Agreement replaces and supersedes the Inter-municipal Business Licence Agreement entered into by the City of Burnaby, the City of Delta, the City of New Westminster, the City of Richmond, the City of Surrey, and the City of Vancouver in 2016.

Signed and delivered on behalf of the Participating Municipalities, the Councils of each of which has, by By-law, ratified this agreement and authorized their signatories to sign on behalf of the respective Councils, on the dates indicated below.

The City of Burnaby

City Clerk _____

Date _____

The City of Delta

Mayor _____

Clerk _____

Date _____

The City of New Westminster

Mayor _____

Clerk _____

Date _____

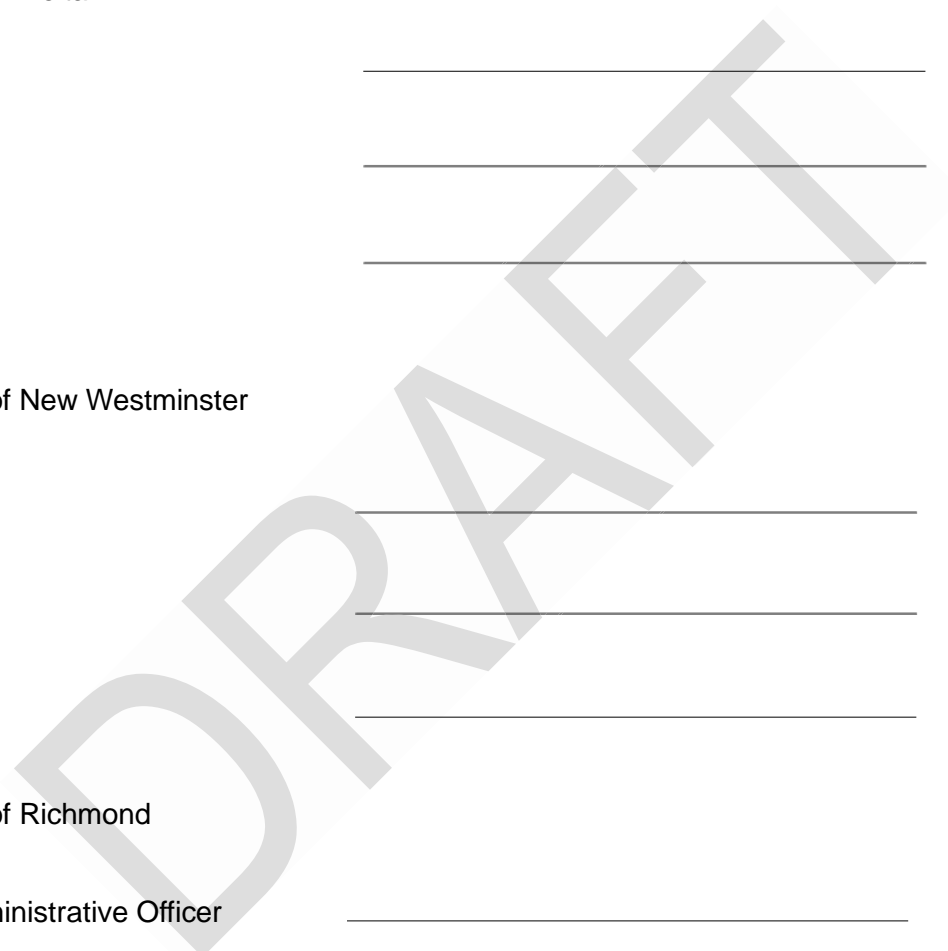
The City of Richmond

Chief Administrative Officer _____

General Manager _____

Corporate and Financial Services _____

Date _____



The City of Surrey

Mayor

Clerk

Date

The City of Vancouver

Director of Legal Services

Date

DRAFT

APPENDIX B**BY-LAW NO. _____****A By-law to enter into an Inter-municipal Business Licence Scheme**

WHEREAS the City of Burnaby, the City of Delta, the City of New Westminster, the City of Richmond, the City of Surrey, and the City of Vancouver (the "Participating Municipalities") wish to permit certain categories of Businesses to operate across their jurisdictional boundaries while minimizing the need to obtain a separate municipal business licence in each jurisdiction;

AND WHEREAS each of the Participating Municipalities has or will adopt a similar by-law and has or will enter into an agreement with the other Participating Municipalities to implement the inter-municipal business licence scheme;

NOW THEREFORE THE COUNCIL OF THE CITY OF VANCOUVER, in public meeting, enacts as follows:

1. There is hereby established an inter-municipal business licence scheme among the Participating Municipalities, pursuant to section 14 of the Community Charter and section 192.1 of the Vancouver Charter.

2. In this by-law:

"Business" has the meaning in the Community Charter;

"Community Charter" means the Community Charter, S.B.C. 2003, c.26;

"Inter-municipal Business" means any of the following businesses that provide services outside of their Principal Municipality:

- (d) a trades contractor or other professional related to the construction industry;
- (e) a contractor who performs maintenance, repair and/or inspections of land and buildings; and
- (f) a health care professional or a health care service provider who provides services by visiting clients in their homes;

"Inter-municipal Business Licence" means a business licence which authorizes an Inter-municipal Business to be carried on within the jurisdictional boundaries of any or all of the Participating Municipalities;

"Municipal Business Licence" means a licence or permit, other than an Inter-municipal Business Licence, issued by a Participating Municipality, that authorizes a Business to be carried on within the jurisdictional boundaries of that Participating Municipality;

"Participating Municipality" means any one of the Participating Municipalities;

"Person" has the meaning in the Interpretation Act, R S.B.C. 1996, c. 238;

“Premises” means one or more fixed or permanent locations where the Person ordinarily carries on Business;

“Principal Municipality” means the Participating Municipality where a Business is located or has a Premises; and

“Vancouver Charter” means the Vancouver Charter, S.B.C. 1953, c.55.

3. Subject to the provisions of this by-law, the Participating Municipalities will permit a Person who has obtained an Inter-municipal Business Licence to carry on Business within any Participating Municipality for the term authorized by the Inter-municipal Business Licence without obtaining a Municipal Business Licence in the other Participating Municipalities.
4. A Principal Municipality may issue an Inter-municipal Business Licence to an applicant if the applicant is an Inter-municipal Business and meets the requirements of this by-law, in addition to the requirements of the Principal Municipality's By-law that applies to a Municipal Business Licence.
5. Notwithstanding that a Person may hold an Inter-municipal Business Licence that would make it unnecessary to obtain a Municipal Business Licence in other Participating Municipalities, the Person must still comply with all other regulations of any Municipal Business Licence By-law or regulation in addition to any other by-laws that may apply within any jurisdiction in which the Person carries on Business.
6. An Inter-municipal Business Licence must be issued by the Participating Municipality in which the applicant maintains Premises.
7. The Participating Municipalities will require that the holder of an Inter-municipal Business Licence also obtain a Municipal Business Licence for Premises that are maintained by the licence holder within the jurisdiction of the Participating Municipality.
8. The Inter-municipal Business Licence fee is \$300 and is payable to the Principal Municipality.
9. The Inter-municipal Business Licence fee is separate from and in addition to any Municipal Business Licence fee that may be required by a Participating Municipality.
10. Despite the provisions of section 12(a) and (b), the Inter-municipal Business Licence fee will not be pro-rated.
11. The term of an Inter-municipal Business Licence is twelve (12) months, except that, at the option of a Principal Municipality, the term of the initial Inter-municipal Business Licence issued to an Inter-municipal Business in that municipality may be less than twelve (12) months in order to harmonize the expiry date of the Inter-municipal Business Licence with the expiry date of the Municipal Business Licence.
12. An Inter-municipal Business Licence will be valid within the jurisdictional boundaries of all of the Participating Municipalities until its term expires, unless the Inter-municipal Business Licence is suspended or cancelled or a Participating Municipality withdraws from the inter-municipal licensing scheme in accordance with this by-law.
13. A Participating Municipality may exercise the authority of the Principal Municipality and suspend an Inter-municipal Business Licence in relation to conduct by the holder within the

Participating Municipality which would give rise to the power to suspend a business licence under the Community Charter or Vancouver Charter or under the business licence by-law of the Participating Municipality. The suspension will be in effect throughout all of the Participating Municipalities and it will be unlawful for the licence holder to carry on the Business authorized by the Inter-municipal Business Licence in any Participating Municipality for the period of the suspension.

14. A Participating Municipality may exercise the authority of the Principal Municipality and cancel an Inter-municipal Business Licence in relation to conduct by the licence holder within the Participating which would give rise to the power to cancel a business licence under the Community Charter or Vancouver Charter or under the business licence by-law of the Participating Municipality. The cancellation will be in effect throughout all of the Participating Municipalities.

15. The cancellation of an Inter-municipal Business Licence under section 14 will not affect the authority of a Participating Municipality to issue a business licence, other than an Inter-municipal Business Licence, to the holder of the cancelled Inter-municipal Business Licence.

16. Nothing in this by-law affects the authority of a Participating Municipality to suspend or cancel any business licence issued by that municipality or to enact regulations in respect of any category of Business under section 15 of the Community Charter or sections 272, 273, 279A, 279A.1, 279B, and 279C of the Vancouver Charter.

17. A Participating Municipality may, by notice in writing to each of the other Participating Municipalities, withdraw from the inter-municipal business licensing scheme and the notice must:

- (a) set out the date on which the withdrawing municipality will no longer recognize the validity within its boundaries of Inter-municipal Business Licences, which date must be at least six months from the date of the notice; and
- (b) include a certified copy of the Council resolution or bylaw authorizing the municipality's withdrawal from the Inter-municipal Business Licence scheme.

18. The invalidity or unenforceability of any provision of this by-law shall not affect the validity or enforceability of any other provisions of this by-law and any such invalid or unenforceable provision shall be deemed to be severable.

19. Despite any other provision of this by-law, an Inter-municipal Business Licence granted in accordance with this By-law does not grant the holder a licence to operate in any jurisdiction other than within the jurisdictional boundaries of the Participating Municipalities.

20. A business licence granted under any other inter-municipal business licence scheme is deemed not to exist for the purposes of this by-law, even if a Participating Municipality is a participating member of the other inter-municipal business licence scheme.

21. The name of this by-law, for citation, is the "Inter-municipal Business Licence By-law".

22. Council repeals By-law No. 10758.

23. A decision by a court that any part of this by-law is illegal, void, or unenforceable severs that part from this by-law, and is not to affect the balance of this by-law.

24. This by-law is to come into force and take effect on January 1, 2025.

ENACTED by Council this day of , 2024

Mayor

City Clerk

DRAFT