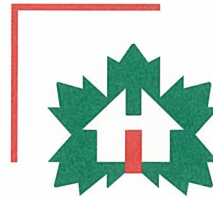


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Canadian
Home Builders'
Association



Association canadienne
des constructeurs
d'habitations

October 18, 2010

Chris Fillingham, Chair
Canadian Commission on Building and Fire Codes
c/o Anne Gribbon, Secretary
Canadian Codes Centre / National Research Council
1200 Montreal Road, Ottawa, ON K1A 0R6

Re: Science and the Baseline for the National Energy Code for Buildings (NECB)

Dear Mr. Fillingham,

In a letter to the CHBA dated August 31, 2010, Mr. Clemmensen wrote that the CCBFC and its Standing Committee on Energy Efficiency recognized that the baseline that underpins the thermal requirements in the National Energy Code for Buildings involved a process that was "not an exact science".

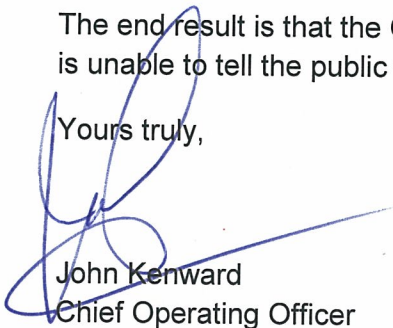
We agree. Indeed, science had little or nothing to do with it. The proposed baseline values were set well above what is being built. As a result, very aggressive requirements have been adopted without having to address cost implications in a rigorous way.

While a high baseline makes paybacks appear to be longer, this was not a factor in the decision to adopt the recommendations of the Standing Committee. Of much greater importance is the fact that by measuring the cost increment from an artificially high baseline, the real costs of the changes are hidden.

The complete absence of rigour in the process of establishing the baseline leaves the credibility of the National Energy Code for Buildings open to question, and reflects a disregard for the disciplined analytical approach that characterizes the National Code Development Process. The limits of what can be expected from a scientific approach do not justify the abandonment of analysis altogether and reasonable efforts to assess costs. "Best judgement" would have been to collect sufficient information before making a decision.

The end result is that the CCBFC has declared an increase in energy efficiency of more than 25%, but it is unable to tell the public what it will cost, not even approximately. This is a very unfortunate result.

Yours truly,


John Kenward
Chief Operating Officer

cc. CHBA Executive Board