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Director General

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Institute for
Research in Construction

Institut de
recherche en construction

Ottawa, Canada
K1A 0R6

NRC-CMRC

July 6, 2007

Richard Lind
President
Canadian Home Builders' Association
150 Laurier Avenue West, Suite 500
Ottawa, ON
K1P 5J4

Dear Richard:

I thank you for your letter of 24 April expressing CHBA's views on regulatory and non-regulatory approaches in achieving public policy objectives and encouraging innovation and creativity in the housing sector.

Although the NRC-IRC plays host to the national code development system that contributes model codes and related technical guides to the sector, this activity is managed under the competent stewardship of the Canadian Commission on Building and Fire Codes, with policy advice from the provinces and territories that have regulatory jurisdiction. The questions you raise on the desirable scope of regulations, and on the thoroughness of the research and analysis underlying regulatory support tools, are indeed very important.

As regards scoping issues, a process has been set by the Canadian Commission on Building and Fire Codes to ensure that new code objectives are considered only after consultation with provinces and territories through the Provincial and Territorial Policy Advisory Committee on Codes. This process also allows for broad stakeholder consultation prior to decisions being taken. A Task Group is also currently working on guidelines to be used in giving due considerations to cost-benefit issues when considering any change to the national codes.

The NRC-IRC has always stressed the importance of code requirements and regulatory support tools being based on sound scientific grounds. The contributions of the institute to this aspect of the Codes through the conduct of codes-related research and development of related guides, test methods and technologies have been many over the course of its 60-year history. Of course, the official recognition of such regulatory support tools is a matter of choice by the authorities having jurisdiction. We have developed a long and successful tradition of making our knowledge and expertise available to anyone who wishes to use it or are looking to develop similar tools.

Our institute is also very much interested and engaged in the development of best practice tools that aim to optimise the cost efficiency of construction in its broadest meaning. Such optimisation often leads construction professionals in considering quality aspects and levels that go well beyond the scope of minimum code requirements. Examples of our work and outcomes in this area are many. They include lighting and daylighting strategies that are better integrated with ventilation, heating and personal comfort objectives, the development of advanced materials that utilize waste by-products, and the elaboration of decision-support systems that account for life cycle costing considerations.

These R&D activities are strategically focussed on the development of knowledge and the technology base essential to the creation of a quality and cost-effective built environment. Other key thrusts include the provision of integrated decision-making tools and other technologies that can enable the sector to improve its productivity and respond to performance expectations that are beyond codes. We transfer these outcomes to the marketplace via our various publications, through practical software tools and in the popular BSI seminar series. We also work directly with manufacturers in helping them prove the performance of their innovations in large-scale facilities such as the Canadian Centre for Housing Technologies.

It may be that we have not made it clear enough to the marketplace that we also offer tools and solutions addressing concerns that go well beyond the code minimum requirements. I thank your association for its generous offer to participate in a dialogue on how we could do more in building up or better communicating this capacity, and look forward to receiving your ideas and suggestions in this regard. We would be happy to work with CHBA to arrange a more structured discussion of this area of interest.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bob Bowen', written in a cursive style.

Bob Bowen