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**Canadian
Home Builders'
Association**



**Association canadienne
des constructeurs
d'habitations**

September 5, 2008

Bruce Clemmensen, Chair
Canadian Commission on Building and Fire Codes
c/o Anne Gribbon, Acting Secretary
Canadian Codes Centre / National Research Council
Building M-23A
1200 Montreal Road
Ottawa, Ontario K1A 0R6

Dear Mr. Clemmensen,

A number of provincial governments have moved to incorporate prescriptive energy efficiency requirements into their Building Codes. Further, this past July the provincial premiers, through the Council of the Federation, have indicated their desire to see energy efficiency added as a fifth core objective of the model National Building Code of Canada (NBC).

At present, there is considerable inconsistency among provinces in terms of both the specific requirements being instituted, and in the timing of these changes. The Canadian Home Builders' Association (CHBA) is very concerned that these developments threaten the uniformity and integrity of Canada's system of Building Codes and Standards.

The Association believes that the refurbishment of the Model National Energy Code for Houses (MNECH) provides a disciplined, transparent and appropriate mechanism for addressing energy efficiency in new housing for those provinces that wish to enact such requirements. We have expressed this view to the CCBFC.

The provinces have indicated clearly their interest in seeing energy efficiency added as a core Code objective. Any such proposed change should be subject to an appropriate and disciplined process based on the protocol currently under development by the CCBFC.

Should energy efficiency be adopted as an objective of the NBC, the timely refurbishment of the MNECH will become urgent, in order to provide a consistent and uniform national approach. Such an outcome is of significant importance to the residential construction industry, and consumers, across Canada.

In summary, the CHBA wishes to advise the CCBFC of the following:

- 1) Given the provinces' stated intention to see energy efficiency added as an objective of the NBC, the Association recognizes the importance of the CCBFC completing development of the protocol for assessing the addition of new objectives to the NBC. This work is currently underway. Once the protocol is in place, the CHBA would support consideration of energy efficiency as a NBC objective.
- 2) The CCBFC will need to press forward with the refurbishment of the MNECH on an expedited basis. This process need not take as long as the current work on the Model National Energy Code for Buildings. Further, the refurbishment of the MNECH should avoid the problems identified by the CHBA and others in its current edition. It is the position of the CHBA that the refurbishment of the MNECH provides the foundation for a disciplined and evidence-based approach to both prescriptive- and performance-based energy efficiency requirements in the NBC and in provincial Building Codes.

It is only through immediate action on these two important matters by the CCBFC that a disciplined national approach can be assured. The CHBA is very concerned that, at present, the singular lack of coordination among various provincial Code-based energy efficiency initiatives is undermining the uniformity and integrity of Canada's Building Code system. Addressing this unfortunate trend will be to the long-term benefit of our industry and consumers.

Yours truly,

A handwritten signature in black ink, appearing to read "John Hrynkow". The signature is fluid and cursive, written in a professional style.

John Hrynkow
President