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Canadian
Home Builders'
Association



Association canadienne
des constructeurs
d'habitations

January 18, 2010

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

Re: National Energy Code for Buildings – Envelope Requirements

Dear Mr. Clemmensen:

The Canadian Home Builders' Association recommends that the Standing Committee on Energy Efficiency in Buildings (SCEEB) receive guidance on the key policy issues identified in my letter of January 11, 2010. These include:

- **Equipment:** Should the Code regulate equipment beyond the level already regulated under the Energy Efficiency Act?
- **Maximum Fenestration Area:** Should the requirement be made more limiting than current requirements and if so, based on what criteria?
- **Air Barriers:** Should the Energy Code introduce a new systems approach or should it be considered by the Part 5 Standing Committee?
- **Envelope Thermal Resistance:** Is there a target for a percentage increase from the current requirements? And/or a target payback period for the cost of making the envelope more thermally resistant?

During the discussion at the CCBFC Executive meeting on January 14, 2010, Code Centre staff indicated that a target of 25% above the requirements in the current version of the Model National Energy Code for Buildings would be used as the basis for developing new requirements. It appeared that that the Executive Committee endorsed this approach and if this is so, this should be communicated to the SCEEB which is currently using different criteria.

It is also appeared that the proposals would be refined based on "buildability" and on cost recovery information (simple payback and life cycle analysis) to be provided by consultants. Staff also indicated that a term of 15 to 20 years would be used.

For the CHBA, the key criteria would be that any new requirements be based on current practice. This approach would allow practice to advance while minimizing the risk of widespread technical problems from imposing new practices which are unknown to a majority of architects, engineers, builders and tradespersons.

Yours truly,



John Kenward
Chief Operating Officer

cc: CHBA Executive Board