



February 18, 2026

The Right Honourable Mark Carney, Prime Minister of Canada
House of Commons
Ottawa, ON
K1A 0A6

Subject: Urgent Need to Pause National Model Codes Changes and Adoption

Dear Prime Minister Carney,

The Canadian Home Builders' Association (CHBA) continues to support building code development where it follows principles of clear and convincing policy analysis, where evidence-based decision-making happens in public meetings and where committees emphasize cost-effective (ideally cost-neutral) acceptable solutions that equally solve the climate and housing affordability crises in Canada. We estimate that the new 2025 code will add over \$100,000 to the cost of a typical new home (see below)—this is completely untenable. To that end, we cannot support the 2025 model codes or their adoption and call for an immediate pause to redo them properly.

CHBA has become seriously concerned over the last few years with how Canada's new governance system for national codes and its updated code development process is neither transparent nor evidence-based anymore. These deficiencies are having a direct and negative impact on housing affordability, construction productivity, and the ability of industry stakeholders to contribute meaningfully to effective codes development and implementation while reaching your government's priorities of additional housing supply and more climate change effective construction.

Further to that, by not addressing housing affordability in the national model codes, even though most provinces and territories call it a priority, there may in fact not be harmonization – the very reason model codes exist in the first place – because provinces may rightly reviewed and accepted by the time they are published, which negates harmonization by instead increasing the likelihood of provincial variations or non-adoption. Lack of harmonization at the provincial (and municipal) level is a key barrier to industry productivity.





A serious course correction is needed, and thus CHBA is urging the Government of Canada to immediately pause all changes to the National Model Construction Codes, as Australia has done with its code system. With that, and before seeking adoption of the 2025 National Construction Codes by the provinces, CHBA is calling on the government to improve the 2025 codes with the proper lenses of affordability, evidenced-based decision-making, and a view to regulations that will truly lead to the optimized outcomes that must be considered in today's world. The 2025 codes should be paused, revisited, and re-issued once these issues are addressed, so that provinces can and should actually adopt them, and harmonization can be achieved.

Here are our key reasons for pausing all construction code changes and revisiting them with proper focus:

- **Reduced Productivity** – The large amount of national priorities and the pace of developing the respective code changes leave insufficient time for proper review, simplification and resolution of outstanding constructability or affordability concerns by those who are most affected – the residential construction industry (as well as building officials) and Canadians facing affordability challenges in trying to buy a home. The amount of new code requirements is overwhelming. Changes related to energy, greenhouse gas emissions, radon, and wind/seismic loads add significant costs and delays and will reduce the productivity of the sector, while in many cases not even delivering the right outcomes. Much better approaches to achieve these goals must be found through a revamping of the 2025 code, with timelines and solutions that support affordability.
- **Affordability Ignored** – There is no formal requirement or code objective to protect housing affordability – not even a principle for committees developing the national codes. Economic concerns brought forward by the construction industry are being dismissed, and cumulative costs for all changes in the 2025 codes have not been calculated by those developing the code. Ultimately, it is Canadians bearing the brunt of the added cost of these changes. All changes should be properly revisited to look at their individual cost impacts, plus the cumulative cost impacts of the full suite of changes the 2025 code will require on each home. CHBA's initial analysis of a typical 2500 sq. ft. home estimates increased costs from the 2025 code changes to be \$56,364 (see Appendix A) without any energy efficiency compliance cost. If provinces continue to mandate the progressive energy targets from the 2020 codes from Tier 1 to Tier 5 this would double those costs, bringing full implementation of the 2020 energy targets and 2025 codes to an estimated cost of \$113,930 for each home built within the next few years. CHBA's Housing Market Index shows material





costs alone for that same house have gone up \$100,000 from 2025. Canada's housing crisis cannot handle these kinds of increases. A much more reasonable approach is needed.

- **Reduced Transparency** – Recent changes to the governance and committee structure have reduced transparency and sidelined industry voices. Decisions are increasingly made behind closed doors, with little rationale published or meaningful engagement with those most affected – Canada's residential construction sector. The residential construction sector (and Canadians who need housing that they can afford) can no longer be the target of poorly thought-out policies and regulations that take away from building more supply. If all levels of government hope to achieve building 500,000 new homes per year, they need to treat the sector as a partner, and excessive and ill-conceived regulation is a key barrier to be addressed jointly.
- **Harmonization Failure** – Without addressing affordability in national codes, which is a key priority for almost every province and territory, the national codes risk being not adopted, or being modified so much provincially that there isn't in fact harmonization. To that end, the federal government should change the national code publication process such that provinces and territories have time to review a draft code for a year so they can collectively agree to a set of changes they can then adopt as fully harmonized national code at the time the code is published. Without this change, provinces will continue making their own amendments, which prevents harmonization and risks low adoption of costly changes in the 2025 codes. We are urging the federal government to take action now to avoid further fragmentation across Canada.
- **Fragmented Interpretation** – Local interpretation of building codes varies significantly from municipality to municipality – even across the same city sometimes, causing delays and extra costs for the industry. This barrier to more housing faster has not been recognized by governments. As the government continues to reduce inter-provincial trade barriers, it also needs to resolve the fragmented interpretation of building codes that not only vary from province to province but also municipality to municipality. To that end, CHBA recommends a National Code Interpretation Centre be established at the National Research Council to publish code interpretations—provinces can in turn reference those interpretations, making them binding, and helping to end the endless variations on code interpretations that are a major barrier to industry productivity.





The roadblocks confronting the residential construction industry, such as rising costs, reduced transparency, and fragmented code interpretation will inevitably hinder the government's pursuit of doubling housing starts, including affecting the government-supported housing to be built under the Build Canada Homes initiative. Without urgent reform, these systemic issues will undermine all efforts to deliver housing Canadians can afford on the accelerated timelines needed.

Facing very similar challenges, the government of Australia recently paused changes to its National Construction Code until 2029, following a report from its own Productivity Commission. The report found that frequent code changes were slowing housing delivery and increasing costs. The pause is intended to provide stability, reduce red tape, and help the industry focus on building more homes. The parallels between Australia's housing challenges and Canada's are extensive, making a similar move for Canada justified and essential.

To that end, Canada should follow Australia's lead and

- immediately stop the adoption and implementation process of the 2025 National Construction Codes, and assess them, with a plan to only put forth for adopting cost-neutral changes for housing in Part 9 of the 2025 national codes (such as the prescriptive point-based compliance paths for all energy efficiency tiers)
- pause all 2030 code development until critical reforms are made to the development approach, such as
 - restoring transparency, accountability, and meaningful stakeholder engagement within the codes system
 - adding an ex-officio seat for CHBA and other broad sector stakeholders at all CBHCC meetings (including in-camera meetings) to properly inform the development from an industry perspective
 - reinstating a coordination committee dedicated to NBC Part 9 (which deals directly with housing) rather than spreading it across 13 committees with non-residential construction
 - reducing the priorities for the 2030 code cycles, focusing only on essential, cost-neutral requirements
 - making housing affordability a core principle in code development along with a robust structured process to assess and limit individual-change and cumulative costs for each future code edition
- establish a National Building Code Interpretation Centre to achieve consistent local application of harmonized national construction codes, and work with the provinces to make published solutions binding.





Canada must act quickly to avoid the same problems identified in Australia and ensure our codes system supports safe, affordable, and climate-resilient housing.

CHBA remains committed to working with government towards a more effective and inclusive code development process. We would be happy to meet with you and your officials at your earliest convenience to continue this important conversation and inform immediate action.

Sincerely,

Kevin Lee, P.ENG., M.ARCH.
CEO, CHBA

cc:

The Hon. Gregor Robertson, Minister of Housing and Infrastructure

The Hon. Mélanie Joly, Minister of Innovation, Science and Economic Development

The Hon. Dominic LeBlanc, Minister of Internal Trade and One Canadian Economy

Mitch Davies, President, National Research Council of Canada





Appendix A

Initial Costing Estimates for the 2025 Code

The following is an initial average additional cost estimate of the 2025 National Building Code changes based on CHBA's costing archetype (a 2,500 square foot, detached, single-family dwelling). The middle column outlines the applied cost that was completed by Codes Canada; these costs were referenced in the impact analysis from their respective Proposed Change Forms (PCF) for each code change, which were low, developed years ago, and were never added together to show the total cost of the 2025 code. The column on the right outlines CHBA's applied cost that reflects what a builder would be expected to pay in today's market. The first cost row is based on all 2025 code changes and complying with the base code for energy efficiency. The following rows each reflect all 2025 code changes (to a base case Tier 1 house with no energy upgrades), plus complying with higher energy tiers (e.g. Tiers 2, 3, 4 and 5).

2025 Code Changes by Subject:

- Accessibility, Visitability, Adaptability
- Door/Window Sill Protection
- Radon
- Mandatory AC
- SHGC for Windows
- Energy Efficiency
- Greenhouse Gases
- Lateral Loads
- Future-adapted climatic loads data
- Wind and snow load return periods

Cost Added by 2025, including additional EE Tiers		
	Applied Cost (Codes Canada 2022)	CHBA Applied Cost 2025
New 2025 Code (base Tier 1 EE)	\$30,798	\$56,364
Total Plus Tier 2	\$34,598	\$62,064
Total Plus Tier 3	\$37,182	\$65,940
Total Plus Tier 4	\$44,361	\$76,709
Total Plus Tier 5	\$69,175	\$113,930



Figure 1 – CHBA Archetype, Front Elevation

Figure 2 - CHBA Archetype, Elevations and Floor Plans