

Date: March 3, 2026
To: Provincial Building and Safety Code Authorities
Subject: The Need to Pause Adoption of the 2025 National Model Codes

With the 2025 National Model Construction Codes, provincial governments are being asked to adopt the most extensive and costly set of code changes in recent history at precisely the moment when housing affordability, labour capacity, and delivery timelines are under severe strain.

Many jurisdictions are still implementing major requirements from the previous code cycle, particularly higher energy efficiency tiers, yet are now expected to absorb another wave of complex changes. The cumulative effect is rising cost, growing uncertainty, and increasing risk to housing supply at a time when Canadians urgently need more homes.

This request for a pause is not opposition to progress. Canadian housing has made significant advances in safety and energy efficiency. The challenge today is not ambition, but overload. The pace, volume, and cumulative impact of recent and upcoming code amendments exceed the industry's ability to implement them effectively, especially without clear evidence that affordability and constructability have been fully considered in the development of the code.

At the same time, it is our view that the national code development process itself requires serious adjustment. Recent cycles have advanced with limited practical review, insufficient transparency, and no comprehensive assessment of cumulative costs, pushing political agendas ahead of sound code development process and due diligence, which can lead to very problematic unintended consequences. Affordability is not treated as a core principle, leaving provinces to manage the cost challenges during adoption. This places jurisdictions in the untenable position of having to reconcile national policy objectives with provincial housing supply and affordability mandates. As a result, provinces are increasingly compelled to delay, modify, or selectively adopt national model code provisions. While there is a drive to harmonize, the current system in fact undermines harmonization, increases complexity for builders and municipalities, and ultimately drives up costs for homebuyers.

At this point, at the provincial level, governments can work directly with their home builder associations to review the 2025 code changes, allowing cost-neutral measures, error corrections, and stabilizing amendments to proceed, while creating space to properly address those changes that raise concerns related to cost, complexity, or constructability. As an association, we have a series of recommendations on the positive developments that should be adopted from coast to coast, while we recommend that the rest of the changes be avoided until proper process is undertaken to reconsider them.

While this may be the most practical and constructive path forward at the provincial level during the current adoption phase, we also recommend that all provinces and territories participate in a coordinated pause moving forward on all new code development to allow a focused dialogue on the national code system itself, including governance, volume and pacing of code development priorities, affordability considerations, and the conditions necessary for true harmonization. Canada has taken similar steps in the past – skipping the 2000 edition of National Codes – when systemic reforms were required, and other jurisdictions internationally are doing the same today. Australia, for example, facing similar problems, has paused building code changes until 2029.

We therefore respectfully request that provincial governments pause adoption of the 2025 national model codes to allow for coordinated dialogue on the national code system combined with a

selective but nationally coordinated approach at the provincial level that allows cost-neutral changes, error corrections, and stabilizing amendments to proceed while more complex or costly measures are reassessed.

This coordinated reset would strengthen confidence in the code system, support provincial housing objectives, and help ensure that future code adoption enables, rather than impedes, the delivery of housing Canadians can afford.

The provincial home builders' association in your province is pleased to continue this dialogue with you to advance this critical agenda and the particulars most relevant to your province.

Respectfully submitted,

Canadian Home Builders' Association



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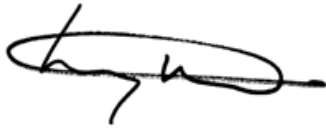
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