Canadian Home Builders' Association

PAUSE ALL THINGS CODES

A WHITE PAPER

Why taking a pause to fix the 2025 National Building Code before adoption and to address shortcomings in Canada's new National Model Codes Development System is essential for housing affordability, supply, productivity and more

Prepared by the Canadian Home Builders' Association (CHBA)

March 2026

Table of Contents

Executive Summary

This executive summary consolidates the key findings, implications, and recommendations from CHBA's March 2026 white paper calling for a temporary pause on adoption of the 2025 National Building Code (NBC) and a reset of Canada's National Model Codes Development System. It is intended for decision-makers who need a clear understanding of (1) why the current system is producing unaffordable and difficult-to-implement outcomes, (2) what the most material process and governance failures are, (3) which 2025 technical changes are most problematic, and (4) what practical actions governments can take to restore affordability, productivity, and national harmonization while maintaining core health and safety objectives.

1. Context and purpose

Canada's housing affordability and supply crisis makes it essential that code changes be sequenced, evidence-based, cost-effective and implementable at scale. The current national code development and governance model – implemented beginning in 2022 with the Canadian Board on Harmonized Construction Codes (CBHCC) and the Deputy Ministers' Table – has not delivered on promises of a more transparent, collaborative, and harmonized system. Instead, the 2025 codes were produced on an unusually compressed timeline with a high volume of major changes, limited

implementation supports, and insufficient attention to cumulative cost impacts – with more decisions made behind closed doors, less industry input and with little effort to ensure that all provinces can adopt all national changes.

There is therefore an urgent need for a **temporary pause on adoption of the 2025 codes** (and a recalibration of the 2030 development work) to: (a) fix identified shortcomings in the new national model code system; (b) correct or defer select 2025 requirements that are high-cost, overly complex, or not implementation-ready; and (c) restore the conditions for harmonized, predictable adoption across provinces and territories. Other countries in similar situations, like Australia, are taking exactly such a pause and the necessary recalibration of their codes system.

2. Headline findings

- **The national code process is not consistently following "good regulatory practice" principles** (evidence-based decision-making, transparency, least-cost approaches, and administrative burden reduction), and the system lacks binding affordability safeguards.
- **Governance and process changes since 2022 have reduced transparency and weakened accountability** (more in-camera decision-making and limited publication of rationales), while spreading residential issues across many committees and task groups.
- **The pace and volume of change are outstripping implementation capacity** (training, enforcement consistency, labour and supply-chain readiness), increasing the risk that unresolved issues will have to be "solved in the field" at higher cost and lower productivity.
- **Part 9 (Housing and Small Buildings) is particularly at risk** because fragmentation and increasing complexity undermine the prescriptive simplicity that historically enabled efficient low-rise housing delivery without extensive professional design.
- **The 2025 code package carries significant cumulative cost impacts** that, in CHBA's assessment, worsen affordability and encourage divergence in provincial adoption, undermining harmonization.

3. Affordability and productivity implications

The cumulative impact of multiple code changes – combined with ongoing provincial requirements to progress through energy tiers introduced in the 2020 codes – creates a cost shock that the housing system cannot absorb without reducing supply, slowing approvals, and pushing buyers into older housing stock. CHBA estimates that, for a representative 2,500 sq. ft. single-family home, the **non-energy** 2025 code changes add approximately **$56,364**. When combined with the costs of progressing to the highest energy tier requirements, CHBA estimates total impacts (2025 changes plus moving to the top tier) of approximately **$113,930** for that archetype.

Beyond cost, the negative impacts are substantial:

- **Housing supply:** Higher per-unit costs, longer approval timelines, and added technical complexity reduce the feasibility of projects and can lower the number of units delivered (especially where space-consuming requirements reduce yield).
- **Productivity:** More complex compliance pathways shift work from "repeatable prescriptive practice" toward bespoke design, additional review cycles, and professional sign-offs – particularly problematic for Part 9 housing that historically avoided these burdens.

- **Implementation risk and delays:** Requirements introduced without complete guidance, interpretation support, and training increase municipal variability ("desk-to-desk" differences), driving redesign, disputes, and financing delays.
- **Harmonization:** When affordability and readiness are not built into national decisions, provinces are more likely to defer, amend, or selectively adopt, weakening the economic benefits of national model codes.

4. Core system and governance problems identified

4.1 Reduced transparency and limited accountability

Key decisions are increasingly made behind closed doors, with limited publication of the rationale for policy choices, approvals, and scope decisions. This reduces the ability of affected parties to understand decision drivers, correct errors early, and participate effectively – ultimately shifting problem resolution to the adoption and enforcement stage, where costs and delays are higher.

4.2 Fragmentation of Part 9 and marginalization of housing expertise

Part 9 was created to provide clear, prescriptive "acceptable solutions" usable without extensive professional design involvement for housing and small buildings. Under the new structure, the development of residential requirements is distributed across many committees and task groups, and there is no single integrating forum accountable for ensuring Part 9 remains coherent, simple, constructible, and well integrated using the "house-as-a-system" approach. This is leading to increased complexity, uneven tone/terminology, and a higher likelihood that requirements default to engineered solutions, with direct affordability and productivity impacts.

4.3 High pace, high volume, and incomplete solutions

The paper describes the accelerated development cycle for the 2025 codes, while transition from 9 to 13 committees and alongside a large workload that is now distributed across 13 committees and 50+ task groups, with numerous public reviews. This cadence creates pressures to meet publication deadlines even when issues remain unresolved, resulting in requirements that are not fully "field-ready" and that increase the likelihood of inconsistent local interpretation, increased permitting friction, and additional reliance on professionals.

4.4 Policy framework gaps (affordability, evidence, and policy design)

The paper identifies four policy gaps: (1) **no formal affordability objective or cost-neutrality principle** guiding national model code decisions; (2) policy direction that is increasingly shaped by political directives rather than completed technical evidence and comparative policy analysis; (3) insufficient exploration of non-regulatory alternatives (e.g., incentives, voluntary programs, grid decarbonization pathways) before regulating; and (4) a system that excessively focuses on new construction, despite the large existing housing stock where emissions and energy reductions may be achieved at much larger scale through practical renovation pathways.

4.5 Governance concerns and harmonization readiness

The paper raises concerns about governance design, including NRC's evolving role (host, adviser, and co-chair) given that they take their guidance from political directives and from a government that is not the regulator and the concentration of decision-making with limited stakeholder visibility into deliberations. Publishing national codes before provinces and territories have aligned on

adoption-ready outcomes makes true harmonization difficult and pushes reconciliation and variations downstream – precisely where they add cost and undermine consistent nationwide application.

5. 2025 Technical Changes: what is "ready" vs "not ready"

5.1 Changes that are "ready" (gap-filling, corrections, or practical improvements)

- **Expanded prescriptive compliance options for energy tiers** (trade-off/points method across tiers), which improve usability versus relying only on energy modelling.
- **Energy Use Metrics (EUM) compliance path**, which is particularly helpful for compact homes and as a fairness improvement versus reference-house distortions.
- **Renovation/alteration provisions** (new, nationally-consistent framework for alterations to existing buildings, including energy efficiency requirements tied to practical scope), provided they are implemented with clear, consistent guidance and do not inadvertently trigger full new-construction requirements for routine work.
- **Overheating risk improvements** (revised peak cooling approach), which correct problematic outcomes from the 2020 tiered energy framework – reducing the risk of overheating especially for more energy efficient homes.
- **Low-cost radon-related improvements** such as sealing joints in polyethylene beneath slabs, which have a practical and important benefit.

5.2 Changes that are not ready (high-risk, high-cost, and/or not implementation-ready)

Accessibility, adaptability, and visitability requirements

Removing the housing exemption from the accessibility objective risks expanding requirements into private-market housing without an upfront policy discussion of alternatives and affordability impacts. CHBA estimates adaptability measures at approximately **$2,100 per home** (labour included) and cites estimates for visitability measures (beyond what is already included in CHBA's costing table) in the range of **$7,561–$14,224**. These measures can reduce design flexibility, increase unit size requirements, and affect marketability, and should be separated into targeted, cost-effective approaches rather than broadly mandated in codes during a housing crisis.

Radon mitigation (mandatory passive stack approach)

CHBA supports addressing radon as a health issue but argues the 2025 approach is too narrow by mandating passive stacks for all ground-contact homes. CHBA estimates the added cost at approximately **$2,100 per home** and highlights routing and condensation challenges in common home designs. CHBA also flags risk and liability concerns if the requirement is interpreted as implying an indoor radon outcome that cannot be verified until after occupancy. CHBA recommends retaining the passive stack option but adding other proven compliance options (e.g., capped side-wall venting designed for future activation and active systems) and clarifying that builder responsibility is limited to construction specifications while post-occupancy testing and mitigation remain with homeowners.

Lateral load and structural requirements (wind and seismic)

The 2025 lateral load provisions are overly complex for Part 9 users, increasing the likelihood that building officials require engineered designs even in moderate-risk regions. CHBA estimates

average added costs of approximately **$10,500 per home** and reports substantially higher real-world impacts in some cases when engineering and geotechnical assessments are triggered. CHBA is already actively pursuing having this section revised to allow broader use of simple methods for typical housing forms, and a more explicit alignment between regional risk and required measures.

Operational greenhouse gas (GHG) requirements

The operational GHG framework was advanced without a complete policy case demonstrating least-cost effectiveness and with key design flaws. CHBA estimates added costs of approximately **$30,000 per home** (with large regional variation) and highlights that the approach relies heavily on provincial grid emission factors (which neither builders nor homeowners can control) while providing no credit for on-site solar PV. There needs to be a reassessment of how GHGs are being regulated, clearer cost–benefit analysis, improved equity across regions, and better integration with other instruments (e.g., grid decarbonization and incentives) before provinces adopt these provisions.

Future-adapted climatic loads and increased wind/snow design loads

CHBA recognizes the goal of resilient design but argues the 2025 climatic data and load changes were not supported by sufficient regional impact clarity or demonstrated cost–benefit. CHBA estimates added costs of approximately **$2,400 per home** for future climate data (to 2070) and approximately **$1,650 per home** for higher wind and snow return periods in affected regions, noting impacts may vary significantly by location and could be substantially higher in some cases. There is a need for pausing adoption to reassess regional implications, refine requirements where needed, and support implementation readiness.

6. Recommended actions for governments

6.1 Implement a targeted pause and triage approach for adoption

Provinces and territories, working with the federal government and NRC, should pause wholesale adoption and instead triage 2025 changes into: (1) cost-neutral, error-correcting, and gap-filling measures suitable for near-term adoption (particularly within Part 9); and (2) measures that introduce significant cost, complexity, or unresolved implementation risk that should be deferred for revision and further analysis. This may include fast-tracking such changes currently under development.

6.2 Establish explicit regulatory principles, including affordability limits

CHBA recommends

- adopting clear guiding principles for national model codes that mirror core federal regulatory best practices (e.g., evidence-based decision-making, transparency, consideration of non-regulatory alternatives, and reduction of administrative burden).
- implementing **cumulative costing** as a routine, published deliverable at key milestones, not as an after-the-fact informational exercise.
- setting a **formal affordability limit** (by archetype and region, as appropriate) that triggers re-scoping, deferrals, or offsets when cumulative impacts exceed agreed thresholds.
- applying a **small business lens** that explicitly considers soft costs, compliance complexity, and capacity constraints for smaller builders and municipalities.

6.3 Re-establish strong Part 9 coordination to preserve prescriptive simplicity

CHBA recommends re-establishing a dedicated Part 9 coordinating function (or committee) with broad residential, generalist expertise and a mandate to integrate cross-disciplinary requirements into a coherent, prescriptive framework. This coordinating body would help ensure Part 9 changes remain constructible, consistent in tone and terminology, and aligned with the "house-as-a-system" concept – returning unfit or overly complex proposals before they advance.

6.4 Create a national code interpretation and implementation support function

To address inconsistent municipal interpretation and related productivity losses, CHBA recommends creating a **National Building Code Interpretation Centre** modelled on Alberta's STANDATA concept. In CHBA's vision, the centre would provide publicly accessible, nationally consistent interpretations and deemed-to-comply guidance for national model code provisions, with provinces and territories formally adopting those interpretations to improve predictability, reduce redesign and dispute cycles, and support consistent training.

6.5 Move toward "harmonized-when-published" codes

CHBA proposes shifting to a model where a **draft code** is published earlier in the cycle, enabling a full period for provincial/territorial review, adoption assessment, and alignment before final publication. Under this approach, the final published code would reflect requirements that governments have agreed to adopt broadly, improving national consistency and reducing post-publication variations. Measures not agreed for mandatory adoption could be issued as a voluntary "code-plus" supplement that jurisdictions may incentivize rather than regulate. The one-year draft review would also allow NRC staff and committees to develop illustrated guide and commentary material to be published as soon as the final code is published –further improving implemtnation readiness.

7. What a successful reset would achieve

- **Affordability protection built into the system:** cumulative costing, explicit limits, and least-cost decision discipline.
- **Higher implementation readiness:** codes published with guidance, interpretation supports, and training pathways that reduce local variability.
- **Restored Part 9 usability:** a coherent prescriptive framework that supports repeatable, scalable housing delivery to increase productivity.
- **Improved harmonization:** greater likelihood that provinces and territories adopt the same baseline code with fewer amendments.
- **Better outcomes with less regulatory churn:** safety, health, accessibility, and climate objectives advanced through adequately-paced, evidence-based, and practicable measures.
- **Preparing for local government support via national code interpretations: aiming for** higher productivity through predictable enforcement, fewer redesigns, faster approvals, and reduced disputes across jurisdictions.

A pause is not a retreat from safety, health, resilience, or climate objectives. Rather, it is a request to stabilize requirements during a housing crisis, correct high-cost or incomplete provisions before they become embedded in provincial regulation, and rebuild a national code development system

that produces *adoptable*, *implementable*, and *affordable* model codes that support housing supply and productivity across Canada.

Introduction

The Canadian Home Builders' Association (CHBA) has long supported and participated in Canada's National Code Development System. CHBA was also actively involved in identifying the shortcomings of the previous system and process under the Canadian Commission on Building and Fire Codes (CCBFC). CHBA was optimistic about the promise of a new system.

Since 2022, the beginning of the new governance with the Canadian Board on Harmonized Construction Codes (CBHCC), CHBA upheld its participation in and sought to support the new system recognizing that transformations of this magnitude take time. Recognizing the importance of the construction code system, CHBA has brought up many, if not all, of the issues in this paper at various occasions and instances in the past few years.

Unfortunately, the many industry concerns that have been raised at committees and other levels have not been addressed, and in many cases even acknowledged. The result is now a deeply flawed system and 2025 National Building Code., As a result, CHBA sees the only solution as a complete "pause on all things code", as we see new processes and systems being established and maintained that fall well short of the promises made at the onset of system change and, in some cases, may deliver less value to Canadians and impose more burden on industry. We have raised the alarm bell by boldly asking for a pause on all 2025 code adoptions and 2030 code development to allow reflection and course-correction before it is too late and building regulations eliminate gains made in industry productivity and housing financing policies at a time when Canadians also faces a supply and affordability crisis.

Because of our long-standing support in Canada's code development system, we wish our criticism to be constructive and hope that a dialogue will ensue on each of the issues that lead to a more effective way to deliver necessary building regulations to Canadians at the least or no cost.

It is also worth noting that CHBA has raised all issues discussed in this paper within the current system and during the development of the recently published 2025 code through all of the proper channels. Unfortunately, these concerns have largely been brushed aside, leading to the current state of affairs and the resultant urgent need for a pause on all things code to recalibrate and reset.

It is in this spirit, that we provide this paper as a basis of this reflection as it discusses shortcomings and provides detail for each of our concerns. It also lays out the respective implications of these shortcomings for industry and Canadians when it comes to affordability and productivity. Very importantly, this paper provides solutions that support the vision of an ideal system and recommended next steps and calls to action for governments to correct errors, fill gaps and remove unnecessary costs.

Background – Regulatory and Policy Development Principles

This section provides some background on the regulatory development principles and good practices used for Federal Government Regulations, which in turn shows the disconnect when it comes to the National Construction Codes Development Process.

The Treasury Board Secretariat's (TBS) best practices for federal regulatory policy development emphasize evidence-based decision-making, transparency, and reducing administrative burden. Guided by the Cabinet Directive on Regulation, these practices are meant to ensure that regulations are justified, cost-effective, and designed in collaboration with stakeholders. However, the National Research Council

(NRC) does not follow these Federal Cabinet Directives or Treasury Board Secretariat Policies or Guidance because it is not a Federal Regulator, and the National Model Codes are not Federal Regulations. The NRC also has not created its own set of principles for the model regulations it produces.

The National Construction Codes Development Process – hosted by the NRC – therefore lacks good regulatory development principles that would specifically direct the CBHCC or its committees to limit cost or favour cost-neutral solutions. Neither the brand-new operating procedures nor the Preface of the newly published 2025 National Building Code mention keeping the regulatory burden low.

Without even such basic regulatory development principles, the NRC, the CBHCC and its committees are not bound to seek more cost-effective ways or best overall policy choices to achieve the desired outcome. In addition, provincial/territorial variations that find their way into the national codes via harmonization in future years, may also not have been developed with affordability or cost-neutrality principles. As such, there is no mechanism to properly ensure that the National Model Codes do not continue to add to the housing affordability crisis, as is seen now in the 2025 publication.

As will be presented throughout this document, the development process for the National Construction Codes is in dire need of basic guiding principles for regulatory development. The key best practices from the federal government's Policy on Regulatory Development and the respective consequences of the shortcomings in the National Construction Codes process are laid out below.

If these principles had been applied in the development of the National Construction Codes, they would have established accountability mechanisms through which the code committees, NRC, and CBHCC members could have been held accountable, which would have helped prevent situation today's crisis point.

Evidence-Based Decision Making and Analysis

- Cost-Benefit Analysis: Proposals must demonstrate that benefits justify the costs and can only add the least cost necessary to achieve the largest net benefits for the desired policy goal – a key omission in today's code development system.
- Risk Assessment: Regulations should be based on robust, science-based analysis of risk – the policy and politics driving rapid development and adoption have sidelined proper risk assessment.
- Instrument Selection: Non-regulatory alternatives (e.g., voluntary measures, information strategies) should be considered first – the current system instead regulates first, without proper assessment of more appropriate non-regulatory approaches.

Stakeholder Engagement and Transparency

- Early Engagement: Consult stakeholders, early in the process and throughout – the new codes system sidelines industry input.
- Whole-of-system implementation: Federal regulatory policy requires regulations to be designed with implementation, compliance, and enforcement in mind – the current code system publishes the codes without full adoption buy-in from the provinces (the actual regulators), resulting in disjointed codes – the exact opposite of the desired harmonization.
- Plain Language: Regulations and guidance should be easy to understand and accessible – headed in the opposite direction, the current code system is adding more and more complexity.

Modernization and Reduced Administrative Burden

- One-for-One Rule and Small Business Lens: Minimize the administrative burden on (small) businesses – this is completely ignored in today's national code process.
- Regulatory Cooperation: Align regulations with other jurisdictions (domestic and international) to reduce barriers to trade and investment – while this is the goal of the system, the current approach is driving more dis-harmonization and at times appears more like a competition between some provinces than cooperation.
- Simplification: Actively remove or update outdated, redundant, or inefficient rules – this is simply not happening in the national code process.

Process and Accountability

- Triage Assessment: Assess the level of impact of the proposal early and throughout – this is not happening sufficiently, given the rush to enact ill-considered policy direction.
- Accountability: Ensure clear accountability, monitoring, and reporting mechanisms – this is being left to the provinces and municipalities after the fact, without sufficient support, such as desperately needed consistent code interpretation mechanisms or even a simple appeal process at the final Code Board decision-making level.

Regulatory Reviews

- Stock Review Plan: Review existing regulations to ensure they are still necessary and effective – codes are only adding more cost and complexity.
- Focus on Growth: Conduct reviews to remove barriers to innovation – so many code changes so fast is stifling innovation.

While the above principles and practices are designed to ensure that regulations protect the public interest (health, safety, security, environment) while supporting a fair and competitive economy, the current national codes system in many ways is doing the opposite. It is time for a course correction, and critical that an immediate pause on all things code be implemented .

Background – What is "Part 9"?

Part 9 of Canada's National Building Code (NBC) is titled Housing and Small Buildings. It contains mostly prescriptive requirements and some performance requirements for the design and construction of homes, multi-unit residential buildings and small non-residential buildings (such as offices and stores) to ensure health, fire safety, energy efficiency and structural sufficiency.

Part 9 applies to buildings that are three storeys or less in height and do not exceed 600 m^2 (~6,458 sq. ft.) in building area (i.e. foot print). Unlike other parts of the code that may require complex engineering calculations, Part 9 provides "acceptable solutions" or "prescriptive" rules that can often be applied directly by contractors and designers without a design from an engineer, fire protection specialist or architect. Part 9 was created so that builders and contractors can follow specific "recipes" for construction (e.g., exactly how many nails to use and how far to space them, or what size a joist must be for a given span) without needing to hire a professional engineer for every step. By providing "pre-approved" or "look-up" construction methods, it reduces the professional fees and specialized labor costs typically associated with larger, more complex buildings. And because the solutions are standardized, local authorities can review and approve permits more efficiently and inspect the

construction without the need for a third-party review (such as commissioning). This all leads to greater productivity.

Why Part 9 Was Created

Part 9 of the National Building Code occupies a unique place as a "code within a code," developed specifically to serve houses and small buildings constructed without professional design involvement. Its structure reflects decades of deliberate effort to make building regulation usable by small builders, contractors, and local officials who are also not engineers or architects. This choice by the early code developers has shaped both the content of Part 9 and the way it is written, applied, and enforced.

From its earliest origins, Part 9 reflects a long-standing recognition that an engineering-based code alone could not serve the needs of Canada's housing sector. Its mostly prescriptive format represents a pragmatic compromise between building science and usability, refined over decades of experience. This historical continuity explains why Part 9 remains fundamentally different from other parts of the National Building Code, enabling greater productivity and lower delivery costs for home construction.

Part 9's prescriptive nature places accountability squarely on the clarity and completeness of the code itself. Builders, inspectors, and authorities rely on the code text as the primary design, construction and compliance tool, not on professional interpretation. As a result, changes to Part 9 carry system-wide implications that extend far beyond individual technical provisions.

Why Simplicity Avoids Unintended Consequences

The prescriptive nature of Part 9 reflects an understanding that houses function as tightly coupled systems, where changes in one area can have unintended consequences elsewhere. More complex or performance-based requirements for one aspect of building performance increase the risk that compliance with one provision compromises performance in another, particularly in areas such as durability, fire safety, or occupant health. In the absence of professional oversight, these risks cannot be mitigated through design judgement or modelling. Simplicity in Part 9 is therefore not a matter of convenience, but a necessary condition for maintaining system-level performance across a very large volume of construction.

Historically, Part 9 evolved in response to the practical realities of the housing sector and the limited capacity of small builders and local authorities to apply engineering-based codes. Its success has depended on clear, prescriptive solutions that are mutually compatible and robust across a wide range of construction practices, housing types and climatic conditions. Introducing greater complexity erodes this balance by increasing interpretation burden, reducing consistency in application, and weakening accountability. For Part 9, complexity does not enhance safety or performance; it transfers responsibility away from the code and onto users who were never meant to carry it.

Prescriptive vs. Performance

Part 9 was never intended to rely primarily on performance-based design. Its prescriptive requirements were deliberately developed to embed building science, system interactions, and constructability directly into the code, allowing houses to be constructed without professional design coordination. This prescriptive foundation is essential to Part 9's role and cannot be replaced without fundamentally changing how housing is regulated.

Performance requirements in Part 9 were introduced to provide flexibility and enable innovation where appropriate. They offer an alternative pathway for advanced solutions, new materials, or unique

conditions, typically supported by specialized expertise. However, they were never intended to supplant prescriptive solutions as the primary means of compliance.

Without a complete and robust set of prescriptive requirements, performance-based options shift design responsibility onto builders, inspectors, and local authorities who lack the tools to manage it. For Part 9, prescriptive solutions are not a constraint on innovation but the stable reference point that makes innovation possible as long as both pathways are maintained, with prescriptive requirements as the default, is fundamental to the effectiveness of Part 9.

Why Writing Code in Part 9 Needs a Dedicated Committee

Part 9 no longer has a dedicated committee, as it did in the previous structure. But Part 9 is built around the idea of the house as a system, where structure, fire safety, the building envelope, ventilation, moisture control, and services all have to work together. Because Part 9 is meant to be used without architects or engineers coordinating these elements, the code itself has to do that coordination. This means the committee developing Part 9 must include members who understand how typical houses are actually built and how changes in one area affect the rest of the house.

A dedicated Part 9 committee brings together members with broad, practical experience who can look at requirements from a house-as-a-system point of view. Specialists are important, but Part 9 cannot depend on specialist judgement at the job site to sort out conflicts or trade-offs. Generalist members play a critical role in taking technical input and shaping it into clear, prescriptive requirements that builders and inspectors can apply consistently, without increasing cost or complexity.

When Part 9 work is spread across multiple committees, each focused on a narrow technical area, no single group is responsible for how the requirements fit together at the house level. Members of these committees are often specialists or academics whose expertise and professional focus naturally centre on optimizing outcomes within their own discipline, rather than on overall constructability, cost, or cumulative impacts in housing.

Without a dedicated committee to integrate these perspectives into one consistent document, the risk increases that Part 9 requirements become more complex, less coordinated, and less aligned with the practical realities of residential construction.

Part 9 is different: why implementation guidance must accompany the code

Publishing the code without the Guide (as is now happening) forces the home builders to proceed without the primary interpretive aid designed for them, effectively shifting learning, clarification, and dispute resolution into live projects and permitting decisions.

For Part 9, the Illustrated User's Guide is not supplemental material. It is an essential implementation tool. Part 9 is applied daily by builders, designers, trades, product suppliers, and building officials working in fast-moving construction and permitting environments. Unlike other Parts of the Code, it is not used primarily by specialists working in office settings with time and resources to interpret new requirements independently. The Guide provides the practical explanations, visual clarification, and plain-language context that allow Part 9 requirements to be understood consistently and applied correctly across jurisdictions. When the Guide is unavailable at the time the national code is published, industry and authorities are forced to interpret new requirements without the very resource designed to support consistent understanding, increasing the risk of uneven enforcement, conservative interpretations, construction delays, and avoidable cost impacts once provincial codes are adopted.

Intent analysis, too, plays a critical supporting role in this context by explaining why requirements exist and how they are meant to achieve the Code's objectives. While intent statements are not used directly on job sites, they are relied upon by designers, regulators, and code officials to resolve questions of interpretation and to assess equivalency and alternative solutions. Publishing the code without timely access to intents shifts this interpretive work into live projects, appeals, and permitting decisions.

Historically, Canada's building regulatory system was supported by a broad suite of explanatory and knowledge-transfer publications produced by NRC's Construction Research Centre and its predecessors. Construction Technology Updates, Canada Building Digests, Building Science Insights, Construction Innovation newsletters, and similar materials were used for decades to translate research findings and emerging technical knowledge into practical guidance for industry. These resources helped practitioners understand not only what was changing in the Codes, but the research evidence and building-science rationale behind those changes, often well in advance of adoption. Together, they formed a critical bridge between research, code development, and on-the-ground application. The disappearance of this entire class of explanatory material has removed an important mechanism for implementation readiness, leaving industry with access to new requirements but without the research-based context that previously supported early understanding, consistent interpretation, and smoother transition.

The gap created by the absence of guides and intents at publication, which fundamentally weakens implementation readiness and pushes learning into live projects and permitting decisions, is compounded by the disappearance of long-standing NRC explanatory products such as Construction Technology Updates, Canada Building Digests, Building Science Insights, Construction Innovation, and related guidance, such as a simple booklet explaining all the changes in a code edition. All of these NRC publications have historically given industry early access to the research and building-science rationale behind code change.

Part 9 depends on broad, consistent application by generalists, not specialists, which makes timely explanatory material indispensable. Publishing a draft national code in year four of the five-year cycle would allow the final year to be used to complete and release these materials alongside the code, restoring a proven implementation model and materially improving understanding, consistency, and uptake.

Background – National Codes

This section is designed as a short primer and backgrounder for readers who do not live inside the complex world of the national codes system day to day. It explains, in plain language, the main steps in Canada's national model code development process and clarifies how responsibilities are intended to flow from priority setting through to publication and adoption.

It also provides context for why process discussions matter. Code outcomes are shaped not only by technical debates, but by when and how decisions are made (including policy directives), who is involved, what information is available at each stage, and how implementation realities are considered before requirements are finalized.

Each step below is presented in three parts.

1. A short description of how the process is intended to work today (for reference: here is the page where the new CBHCC Operating Procedures are being kept up to date).
2. If relevant, a brief note on how the function operated under the previous CCBFC system is introduced and any findings from the *Review of the Coordinated Code Development System*

Phase 2 (Process), published in 2018, and from an independent evaluation by the National Research Council's Office of Audit and Evaluation are added.

3. A concise statement of the process concerns, with a pointer to where those issues are discussed in more detail later in the paper.

Where relevant, the notes also flag improvements that were explicitly identified under the CCBFC system as necessary but have not been implemented, and that would still strengthen the system today. The purpose is not to argue for a return to an earlier model (though in some cases, the better approaches of the old system should be brought forward), but to highlight practical opportunities to reinforce transparency, predictability, and readiness as the system evolves.

National Code Cycle Length

The National Model Codes are developed on a regular cycle, typically spanning five years from initial technical work through publication. Within each cycle, proposed changes are advanced through multiple stages of committee review and are subject to several national public review periods to allow stakeholders and the public to comment on draft provisions. Following completion of the final public review and approval of the consolidated changes, a new edition of the National Model Codes is published. After publication, additional time is required for provincial and territorial consideration, regulatory processes, and implementation, meaning that full adoption and enforcement across jurisdictions commonly occurs some time after national code publication, which varies by province, territory, and sometimes by code topic.

The 2020 national codes were only published in March 2022, and the 2025 codes were published in December 2025, which made it probably the shortest development cycle on record – especially when considering the governance changes undertaken at the same time.

The longest cycle was between 1995 and 2005 when the code was transformed into the objective-based codes concept, and the code development system was changed to create continuous code development process – as well the PTPACC was created. In wise fashion, the 2000 code cycle was skipped to allow proper transformation of the system. It is this type of pause that is needed now.

There were typically four public reviews in a five-year cycle that took place in the fall, with spring public reviews being available for special reviews. The new system has already scheduled eight(!) public reviews until 2029. For organizations like CHBA (and many other industry associations) responding to public reviews takes considerable amount of time to collect feedback from members. The effort for a two-months long public review is added twice a year on top of normal committee activities. These 8 public reviews also come with their own deadlines for committees which encourages a rush for the approval deadline even very early in the code cycle. The burden is too much for industry to properly input, especially when that input is often disregarded with a system driven by other interests.

As discussed throughout this paper, **the shortened code cycle and expanded number of public reviews have contributed to increased pace, unresolved technical issues, reduced implementation readiness, and growing cumulative impacts across successive code editions.** In addition, in the last code NRC's project management set the code publication date as a goal and not the implementation date when all provinces and territories have implemented the code. This omission of the last step leads to a rush in publication without considering shorter, more effective implementation timelines or a higher rate of provincial adoption as a worthy goal.

Top-level Decision-Making and New Governance

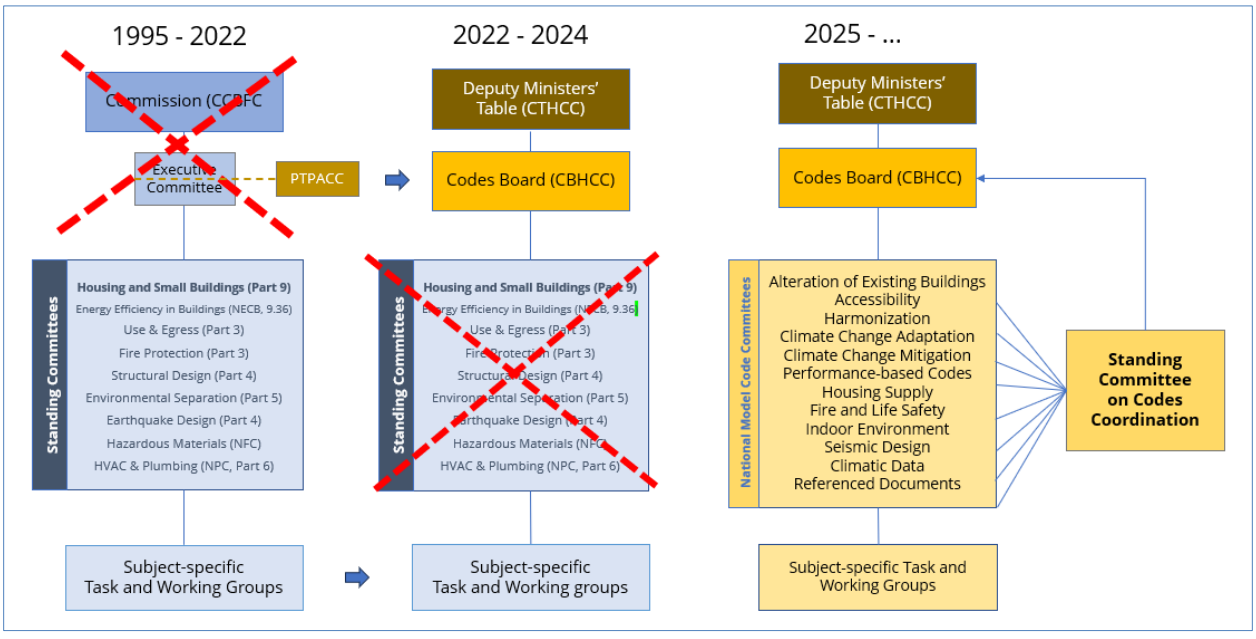
Since its inauguration in 2022, the Canadian Board on Harmonized Construction Codes (CBHCC) – here after referred to as "the Board" or "Codes Board" – is responsible for the new code development system. The CBHCC replaced the Canadian Commission on Building and Fire Codes (CCBFC).

The major change for decision making was that the provincial/territorial chief building code administrators, who provided advice to the CCBFC as a group called Provincial/Territorial Policy Advisory Committee on Codes (PTPACC) under the old system, are now supposed to be the primary decision makers under the CBHCC. (In practice right now, however, there is still no collective decision-making by all provinces and territories to commit them to adopt the same approach, and much policy decision-making is driven not by the provinces but by federal policy or government staff, including that of the National Research Council, driving that policy based on federal government directives.)

The new element in the governance of the new system, which is to set policy and oversee the work of the Board, is the Canadian Table for Harmonized Construction Codes – Policy (CTHCCP) – hereafter referred to as "the Table" or "Deputy Minsters Table". The Table consists of the respective provincial/territorial Deputy Ministers, responsible for building and safety codes.

Having a senior-level provincial/territorial organization like the Deputy Ministers Table oversee the codes system was a major recommendation in the previous code system. The hope was that more senior involvement would increase the improve national code harmonization.

Another major change happened at the committee level, where technical discussions happen. In the previous system, 9 standing committees were set up to be responsible for certain codes or parts of codes. Given that cross-code or cross-part (of the code) coordination was often a challenge, as different professional disciplines had to cooperate and agree on code wording, the new committee structure is based on the subjects that were set as the strategic priorities for the code cycle. This gives the Board and NRC flexibility in the committee structure – for each code cycle, rather than having 'standing ' committees. The 2025-2030 code cycle has 13 subject-based National Model Code Committees (NMCCs) – hereafter referred to as "the Committees".



The graphic illustrates the transformation of the governance and committee structure from the dissolution of the CCBFC and the inception of the CBHCC in 2022 to the system as it operates in 2026.

Priority Setting and Scoping at the Start of a Code Cycle

At the start of each code cycle, strategic priority areas are set by the Canadian Table for Harmonized Construction Codes Policy, with advice from the Canadian Board on Harmonized Construction Codes. These priorities are intended to define the scope and focus of all code development work for the cycle. If done properly, this new process could be a major improvement with a lot of promise to ground priorities with authorities well ahead of a code cycle.

Previously, the CCBFC also operated with an explicit priority-setting process supported by a Task Group on Priorities, linking approved tasks, standing committee work plans, and available resources across the full code cycle. Priorities were intended to be monitored and adjusted transparently as capacity changed. However, the absence of a clear, continuously maintained national priority list was found to be a systemic weakness, and stronger tools, clearer roles, and real-time tracking of priorities and progress were needed.

While conceptually sound, in practice **the number and breadth of priorities per cycle have expanded beyond system capacity, and scope continues to grow after priorities are set, resulting in an overwhelmed system that is rushing development without sufficient system capacity and due diligence, which is all exacerbated by compressed timelines.** This is discussed further in *Focus Area 1 – High Pace and Volume and Increased Complexity*.

Policy Development Before Technical Work

Policy direction is intended to be established early in the code cycle by the Board. It is meant to guide technical committees through clear objectives, priorities, and constraints. In principle, this should allow technical work to proceed with an understanding of policy intent and reduce the risk that fundamental questions are reopened late in the process. The Board writes its policy documents as direction to committees and is to hold consultations about the direction to committees with code users. However in practice, given the overwhelmed system and compressed timelines, committees are often starting their work while policy directions are still being developed, forging ahead without proper guidance – and once the policy guidance arrives, the response is often, now it's too late to change anything.

Under the previous CCBFC system, policy questions were explicitly recognized as distinct from technical drafting. Formal roles existed for the Executive Committee and PTPACC to provide policy advice before or alongside technical work. However, policy guidance was often delayed, even under that structure, and the need for timely policy direction before technical work was already identified under the CCBFC system and remains relevant today.

There is a fundamental disconnect with policy positions being frequently finalized only after technical work is well on its way, limiting meaningful policy debate to properly inform the code's development and ensure proper direction. This results in technical discussions (and interest groups) instead driving policy, and also forces committees to revisit or rework proposals continually, even late in the cycle or forcing sub-optimal solutions through the process because "there is no time." This results in poor policy (or lack of policy) leading to problematic codes, increases inefficiency, contributes to volunteer fatigue, and undermines confidence in the stability of technical direction.

This issue is examined further in Focus Area 2 – Policy Framework.

Committee Structure and Assignment of Work

Work is assigned through the Board's work plan to its 13 National Model Code Committees, their 50+ task groups (TG), and uncounted working groups (WG). These bodies are responsible for developing proposals within their mandates and reporting recommendations back to the Board for approval. The Committee mandates were changed away from being 'standing' responsibilities specific codes or code parts to the subject areas defined by the strategic priorities. For stakeholder input, the Board has a Standing Code Coordinating Committee (SCCC) consisting of all NMCC Chairs and other volunteers, but without industry representation.

The Advisory Council on Harmonized Construction Codes is a loosely assembled forum of industry and advocacy stakeholders who can provide advice to the CBHCC. The NMCC Chair and ACHCC Chair also participate in CBHCC meetings that are closed to the public.

Under the previous CCBFC system, 9 standing committees with defined mandates (and a similar amount of TGs and WGs under them) carried responsibility for sections of the codes or parts, including very importantly one dedicated Standing Committee on Housing and Small Buildings for Part 9. Workload and progress were reviewed annually. However, experience under the CCBFC model showed that workload distribution was uneven, and earlier reviews had already suggested rebalancing mandates and committee structures to improve responsiveness and reduce delays. These structural pressures were recognized before the current governance model and persist today.

Table – Comparison of CCBFC and CBHCC Technical Committee Structures

CCBFC Standing Committees	**CBHCC National Model Code Committees**
Housing and Small Buildings (NBC Part 9)	Alteration of Existing Buildings
Energy Efficiency in Buildings (NECB, NBC 9.36)	Accessibility
Use & Egress (NBC Part 3)	Harmonization
Fire Protection (NBC Part 3)	Climate Change Adaptation
Structural Design (NBC Part 4)	Climate Change Mitigation
Environmental Separation (NBC Part 5)	Performance-based Codes
Earthquake Design (NBC Part 4)	Housing Supply
Hazardous Materials (NFC)	Fire and Life Safety
HVAC & Plumbing (NPC, NBC Part 6)	Indoor Environment
	Seismic Design
	Climatic Data
	Referenced Documents
	Standing Committee on Codes Coordination

Because Part 9 must function as a complete, prescriptive framework for homes and small buildings, its code development requires a committee whose members collectively bring broad, cross-disciplinary understanding rather than narrow subject specialization. A generalist expertise is critical to evaluating how individual technical changes affect constructability, cost, and performance across all areas of building performance (ventilation, building envelope, fire safety, foundations, roofing, airtightness, heating and cooling, etc.), particularly where professional design coordination is not assumed. Distributing Part 9 responsibility across multiple subject-focused committees removes this integrative function, leaving no single group accountable for ensuring that requirements remain coherent, proportionate, and appropriate for the housing sector.

The new system has created a significant problem in that residential work is now fragmented across multiple committees with no single coordinating body responsible for Part 9 (which is the part of the code that focuses on housing and small buildings). Part 9 has historically been a simplified part of

the code, focusing on easier implementation, with a heavy emphasis on keeping costs down, for example by providing many prescriptive approaches that avoid engineering requirements (and other performance requirements) that drive up cost. Under the new system, housing is being mixed in with non-residential construction, and prescriptive and cost considerations are being given less priority, and increased engineering is driving up costs and complexity. The new structure also increases the risk of inconsistent assumptions, gaps between related requirements, and cumulative cost impacts that are not fully visible to any one group. Industry is also excluded from voting membership on the SCCC and key national stakeholders are also not provided access to in-camera CBHCC meetings. These concerns are discussed further in Focus Area 1 – Marginalization of Industry Voices and Focus Area 3 – Governance.

Industry Participation and Transparency During Development

The code development process is described as consensus based and relies heavily on volunteer participation, committee deliberation, and formal public reviews. Advisory bodies are intended to supplement committee work and provide additional perspectives, and effective participation depends on stakeholders being able to see when decisions are being made, how input is considered, and how to engage at the appropriate stages. While committee membership is recruited through an open application process intended to support broad and equitable representation, the criteria used to select among applicants and to maintain balance across interests are not visible to stakeholders, reinforcing perceptions of opacity around committee composition and decision making.

Under the previous CCBFC system, committee meetings, agendas, and minutes were more consistently documented, with clearer records of decisions and rationales including at the CCBFC and its Executive Committee level offering a much clearer path to accountability. Observers and stakeholders had more predictable access to information about ongoing work. All decisions were brought to committees to be vetted rather than having staff make decisions or lead the development of changes as we see in today's system. However, experience showed that awareness of participation opportunities was uneven and that communication, engagement, and visibility into committee operations could be strengthened. Earlier reviews and experience had already pointed to the need for clearer communication about committee activities, public review processes, and how decisions are reached.

Under the new system, key decisions are increasingly made in camera without published rationale, reducing transparency and limiting effective participation by stakeholders who are expected to implement the codes, for example, as Association Stakeholder, CHBA staff is no longer allowed on Working Groups under NMCCs or Task Groups, which is the ground floor of creating working solutions for industry.

This concern aligns with earlier recommendations to improve stakeholder awareness of the code development process, including clearer communication of public review opportunities, decision-making processes, and committee operations – especially at the top level. **Without these improvements, key industry insights are lost and the quality of input received through formal review stages is diminished, resulting in code development that is incongruent with many of the real-world issues faced by industry and that bears more risk of unintended consequences because implementation was not considered.** These issues are addressed in Focus Area 1 – Reduced Transparency.

Technical Development and Problem Resolution

The Committees develop and refine proposed changes based on directions about code change requests approved by the CBHCC through iterative work and based on feedback from public reviews, with approved changes incorporated into the next code publication. In principle, this process is intended to ensure that technical requirements are supported by clear problem definition, appropriate evidence, and an

understanding – at the time of code writing – of how proposed solutions will function in practice. Other than during the committee orientation process, no criteria for 'good code writing' or 'what makes a good requirement' are published. Seven or eight public reviews per code cycle now emphasize a project management approach with tight deadlines – often with insufficient time to perform research or analysis in response to public review comments highlighting another shortcoming of the national code process when compared to the federal government's directives on regulation.

Under the previous CCBFC system, technical development followed a more structured sequence that emphasized problem definition, supporting rationale, and coordination across committees before solutions were finalized. Experience showed, however, that even under that model committees could move too quickly to drafting, with insufficient attention to clearly defining the problem being solved and the downstream implications of proposed requirements. Criteria for smart regulations and what makes a good requirement were described in the Preface of the Model Codes and in the Policies and Procedures. Earlier reviews and experience highlighted the need for stronger discipline around rationale, evidence, and cross committee awareness.

By not following the government's guiding principles on regulatory and policy development, major code requirements are now approved with known gaps, deferring problem solving to implementation and enforcement. This concern aligns with earlier recommendations to better document and track the research basis for code changes and to make technical rationales more transparent to committees, provinces, and users. Without clear problem definition and visible supporting evidence, risk and costs are increased, and are shifted to builders, regulators, and consumers. This issue is discussed further in *Focus Area 1 – Incomplete Code Change Solutions*.

Impact Analysis and Cost Assessment

The underlying approach for impact analysis is largely unchanged as each proposed code change is expected to be supported by an impact analysis considering costs and benefits. Current Board guidance sets out detailed principles for preparing these analyses, including consideration of both qualitative and quantitative impacts, differences between prescriptive and performance-based requirements, and transparency of assumptions, methods, and results. The guidance now also introduces a structured approach to examining cumulative impacts across a full code cycle using a limited set of representative housing archetypes and regional assumptions but uses it as information rather than decision control. That said, very problematically, this examination of the full cumulative impacts of the 2025 code was not undertaken or published.

Under the previous CCBFC system, impact analysis was also required for all proposed changes, with similar emphasis on describing positive and negative consequences, documenting assumptions, and supporting proposed changes with evidence. Experience showed, however, that analyses were often inconsistent in rigour or only an afterthought in committee deliberations. In practice, the focus remained largely on individual proposed change forms, with no ability to see how multiple approved changes interacted or accumulated over time. The new system as an opportunity to correct this, but thus far has failed to do so

While CHBA welcomes that the current guidance formalizes cumulative costing across a small number of housing archetypes and all regions across Canada, it hasn't been **implemented, and even if it was, cumulative costing alone does not materially change how affordability risk is managed within the decision-making process – the result is insufficient consideration of costs and the resultant significant increases in costs driven by the 2025 code.** There remains no binding affordability threshold or effective trigger to pause, re-scope, or reconsider changes when cumulative cost impacts exceed reasonable expectations. As a result, cumulative costing risks becoming an informational exercise rather

than a decision constraint, allowing the combined effect of multiple changes to significantly exceed what was visible or debated at any single decision point. Per the analysis later in the paper, **the result is a 2025 code whose cost impact on a 2,500 sq.ft. home is estimated to be over $113,000** when incorporating the 2025 changes and going to the top energy tier. issue is explored in Focus Area 7 – Cumulative Costing for Codes.

Approval and Governance of Decision-Making

The Committees and their Task Groups and Working Groups now agree to changes by consensus rather than voting on key decisions. After that, the CBHCC formally approves code changes based on committee recommendations, public input, and – if deemed necessary – advice from the Advisory Council. The final CBHCC approval step enables changes to proceed to publication and is supposed to signal that requirements are sufficiently mature, supported by evidence, and ready for adoption by provinces and territories. While final CBHCC approval decisions are made in public meetings, the deliberations leading up to the decision have likely happened during in-camera meetings without input from industry or other affected stakeholders.

Under the previous CCBFC system, technical committee took voting decisions based on deliberations, cross-committee coordination and public input and the CCBFC Executive Committee weighed committee recommendations with provincial and territorial policy advice – with rationales reported and decisions being ratified in public meetings. Earlier process reviews showed that clearer communication of roles, better tracking of cross-cutting issues, and stronger coordination were needed to maintain balance between timeliness and due diligence. Earlier reviews also highlighted the importance of clarity around who decides and on what basis. As well, the 2019 *Regulatory Reconciliation Agreement on Construction Codes (RRACC)* was intended to close some of these gaps by committing governments to a transformed national code development system that is more inclusive of provinces and territories as collective decision-makers, clearer in accountability, and better aligned with harmonization and timely adoption objectives.

Under the new system, decision-making authority is now more concentrated to a small group and approval decisions are insufficiently connected to provincial and territorial readiness and downstream implementation realities. This is not creating proper discussions to create well informed shared national positions, which is undermined further by Board deliberations behind closed doors and rationales not being published. When governance decisions are not clearly linked to harmonization objectives, confidence from industry and provincial authorities having jurisdiction declines and willingness to proceed with implementation is reduced. These issues are discussed further in *Focus Area 3 – National Codes Governance*.

Publication and Harmonization Before Adoption

Once approved, national model codes are published and made available for adoption by provinces and territories. Harmonization is expected to occur through subsequent adoption by each province and territory, with publication intended to signal that requirements are ready to be implemented consistently across jurisdictions.

Under the previous CCBFC system, publication timing showed that delays, interim changes, and inconsistent handling of provincial variations created challenges for coordinated adoption and reduced the practical value of national model codes as a common regulatory baseline.

The 2019 Regulatory Reconciliation Agreement on Construction Codes (RRACC) was intended to address these challenges by committing governments to reduce and, where possible, eliminate technical

variations, adopt codes within defined timeframes, and treat harmonization as a continuous, shared obligation rather than a post-publication exercise. The RRACC also anticipated earlier and more effective integration of provincial and territorial priorities so that national codes are published in a form that minimizes the need for subsequent amendments.

While the goals of the RRACC were appropriate**, in practice codes continue to be published before provincial and territorial agreement is secured, resulting in amendments, delayed adoption, and fragmentation that runs counter to the agreed-to harmonization objectives.** When code publication precedes provincial/territorial/national alignment, the burden of reconciliation shifts to jurisdictions and industry, undermining predictability and weakening the economic and regulatory benefits associated with national harmonization. This issue is examined further in Focus Area 4 – National Harmonization.

Interpretation, Training, and Implementation Support

Implementation, interpretation, and training were and are still primarily provincial and local responsibilities, with feedback from implementation intended to inform future code cycles. The Board has not extended its mandate beyond national code writing, directing code-related research and adoption.

Under the previous CCBFC system, the mandate was very similar, although earlier reviews already showed the need for stronger national mechanisms to support consistent interpretation, timely guidance, and including implementation readiness, particularly when changes are complex, interdependent, or cumulative.

The Regulatory Reconciliation Agreement on Construction Codes (RRACC) recognizes that harmonization depends not only on aligned technical requirements, but also very much on consistent application and timely adoption. The Agreement anticipates a transformed national system that better supports provinces and territories in implementation, with the objective of minimizing variations, reducing delays, and strengthening confidence that national codes can be applied uniformly in practice. That said, there is no guidance in the agreement on how such uniformity can be achieved.

Therefore, under the current circumstances, there remains no national mechanism to ensure consistent interpretation, coordinated training, or implementation readiness before publication. In the absence of commitment to binding decisions with implementation support, differences in interpretation and application continue to emerge across different provinces and from municipality to municipality, and even within municipalities, increasing costs, delaying projects, eroding productivity, making the move to more factory-built systems challenging, and in basic terms greatly undermining the intent of what national harmonization objectives were meant to achieve. This issue is discussed in *Focus Area 5 – Inconsistent Local Interpretation and Application Nationwide*.

Background – International Context: Other Jurisdictions are Pausing

Across several peer jurisdictions, governments and professional bodies have concluded that the pace, volume, and cumulative impact of building code and green regulatory changes are undermining housing affordability and construction productivity. In response, Australia, California, Washington State, and Germany have each taken steps to pause, slow, or recalibrate regulatory requirements, while maintaining long-term safety and climate objectives. These actions reflect a growing consensus that housing goals, affordability and regulatory stability is a prerequisite for scaling housing supply.

Australia

Australia's pause on further residential changes to the National Construction Code (NCC) followed findings by the Productivity Commission that housing construction productivity has been weak for decades. **The Commission identified excessive regulation, frequent code changes, slow approvals, and poor coordination across governments as major contributors to rising costs and reduced housing supply. It explicitly pointed to the NCC as an area requiring reform, noting that cumulative regulatory complexity was impeding housing delivery rather than improving outcomes.**

In response, federal, state, and territory building ministers agreed in October 2025 to pause further residential NCC changes after finalising NCC 2025. Ministers framed the pause as a productivity measure, intended to restore certainty so the industry could focus on building homes rather than continually adapting to new requirements. The decision was presented as a reset, not a retreat from safety or climate goals.

In practice, the Australian pause means no additional residential code changes will be introduced until mid-2029, other than essential safety and quality fixes. All non-urgent changes are deferred to a future code cycle. Construction continues under existing rules, but the regulatory framework is stabilised for several years to support housing delivery and investment.

United States

California

California's decision to pause residential building code changes arose from severe housing affordability pressures and evidence that **repeated state and local code amendments were significantly increasing construction costs**. Policymakers acknowledged that **cumulative green and technical requirements had added tens of thousands of dollars to the cost of new homes and were slowing both new construction and post-disaster rebuilding.**

Through a 2025 budget trailer bill, California enacted a statewide pause on adopting or amending residential building codes until June 1, 2031. The pause applies at both the state and municipal level, preventing local governments from introducing new or more stringent residential requirements during this period. Limited exceptions remain for emergency health and safety measures and wildfire mitigation.

The pause does not halt development. Homes continue to be built under the codes already in force. California also introduced a related stability measure allowing builders to rely on the building code in effect at the time a model home is approved for up to ten years when repeating that design. Together, these measures are intended to reduce regulatory churn, restore predictability, and accelerate housing supply.

Washington State

In Washington State, concerns about housing affordability and builder capacity have driven calls to slow the pace of building code updates. Industry and insightful policymakers argue that frequent code changes disproportionately affect smaller builders, increase compliance costs, and undermine the state's ability to meet ambitious housing targets.

Legislative proposals currently under discussion would pause statewide building code updates for ten years following adoption of the 2024 code edition, with a shift to a longer six-year update cycle thereafter. **The stated objective is to provide a decade of regulatory stability so the construction sector can focus on delivering housing at scale rather than navigating continual regulatory change.**

Separately, Washington's State Building Code Council has already delayed the adoption timeline for the 2024 codes, keeping the 2021 codes in force until the delayed effective date. While procedural rather than statutory, this delay has the practical effect of extending near-term regulatory stability, reinforcing the broader policy direction toward slowing change.

Germany

In Germany, the discussion is being led in part by the Bundesarchitektenkammer (Federal Chamber of Architects, BAK), which has argued that the challenge is not climate ambition, but regulatory overload, legal uncertainty, and excessive standardisation. The BAK has warned that **rapidly tightening green requirements, layered on top of complex technical norms, are increasing costs and slowing housing delivery without guaranteeing better environmental outcomes.**

This debate is reflected in the federal government's Eckpunkte-Papier (key principles paper) on the Gebäudetyp E (Building Type E) initiative. The Eckpunkte-Papier seeks to enable simpler, faster, and more affordable construction by allowing projects to deviate from non-mandatory technical standards and the "anerkannten Regeln der Technik" (recognised rules of technology), while maintaining core safety requirements. The intent is to slow the automatic escalation of green and technical standards that exceed what building law strictly requires.

Importantly, Germany's approach is not deregulation but recalibration. The BAK supports climate-neutral buildings and EU life-cycle carbon objectives, but argues that **requirements must be sequenced, simplified, and legally clear during a housing crisis. By deliberately slowing and rationalising green regulation in the short term, Germany aims to restore affordability and productivity while keeping long-term climate targets intact.**

Focus Area 1 – National Code Process

This section deals with the committee structure and decision-making process of how codes are developed in Canada. It highlights CHBA's experiences and observations as participants in that process for decades.

Reduced Transparency

Today's code decisions are made behind closed doors, often without sufficient consideration for industry stakeholder concerns and the Board neither publishes the rationale for its decisions from in-camera nor from its public meetings. This does not only apply to the final approvals of code changes, it applies to all policy development and subsequent decisions, and all decisions on code change requests (what committees should and should not work on). It even applies to technical committee decisions today, where NRC or provincial government staff have taken the lead in developing changes and made decisions on the way while the technical committees' role is often relegated to rubber-stamping these staff-led changes without much time to consider and understand the rationale for the proposed solution.

In the past, knowing the rationale for these types of decisions has helped industry stakeholders to inform and communicate the path forward. Secondly, important policy and operational decisions were made with broad sector representation at the table in the past, informing the choices of the decisions makers.

As the Australian model of their building code board demonstrates, a voting privilege for broad sector representatives is not required to be at the board table and inform decisions. Plus, basic committee document management and external communications should be re-instated even if a Board consists only of voting government members.

Marginalization of Industry Voices

With the termination of the Standing Committee on Housing and Small Buildings, input from the residential construction is no longer adequately provided. Proposed changes are being developed by 13 committees and 50+ task groups, spreading stakeholders thin and undermining meaningful participation; the tradition of Part 9 as a simple code for low-rise residential construction is faltering, as more complexity is added by non-residential players used to relying on custom engineering in field rather than focusing first on prescriptive requirements that simplify housing production.

The implications are broad. 13 committees and their 50 task groups cannot develop Part 9 code language in consistent tone and terminology. Codes editing after the fact can re-introduce some consistency, but that is limited. The even more significant implication of marginalization of the voices from 'Part 9 experts" is that the nature of Part 9 and its principles beyond simple language are not well understood (i.e. emphasis on cost and constructability, relying on simple construction and details, assuming owners familiar with their space, using appendix notes and guides to provide context and background, not relying on engineers or specialists).

Take for example the development of the lateral load requirements over two code cycles. This subject was deferred from the 2020 cycle so that the committee had more time for the significant simplification required, which remained outstanding after a task group with only structural engineers had attempted writing Part 9 requirements. The only truly prescriptive method in this set of changes was only added late in the process as the result of CHBA public review comments. Even then, this 'simplified method' has 10 strict limitations that make it almost unusable except for very small cubic homes.

What is needed here is a Part 9 coordinating committee with broad sector representation and expertise in all aspects of safety and construction (very much like the previous SCHSB). Since the mandate of this committee is that of coordination, it would not be bogged down with developing and revising changes, but instead with reviewing and sending back unfit code changes and possible developing criteria for Part 9 changes. CHBA therefore recommends re-establishing a dedicated Part 9 coordinating committee with a clear mandate to review, coordinate, and, where necessary, return unfit changes before they proceed.

Another solution could be to field-trial changes with NRC's support and to simplify provisions afterwards to reduce field errors, permit delays, and reduce compliance burden. This would feed industry feedback straight to the code development committees.

High Pace and Volume and Increased Complexity

The volume of priority tasks and the pace of changes for the 2025 and even those anticipated for the 2030 codes 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. Paired with the unwieldy governance of 13 committees and their 50+ task groups, in far too many cases the vetting process includes meaningful industry input.

Some of the code changes that were developed for the 2025 code editions represented significant expansions of scope (such as operational GHG emissions, accessibility for dwelling units or alteration of existing buildings) and are now expected to be implemented by the industry while provinces and territories also require the upwards progressing to ambitious energy efficiency performance levels from the 2020 codes.

The high volume of new compliance areas and the high pace at which these significant subjects are being developed all without a consistent national training program in support of codes and faced with increasing industry capacity shortfalls (e.g. missing refrigerant technicians for heat pump installations) is not only

impeding the federal priority to build 500,000 homes per year, it also leaves unfinished and often unclear provisions to builders and officials to solve in the field further reducing current levels of productivity.

What we need is a service standard for code change readiness, which could be as simple as a checklist determining based on the significance, the newness or the complexity of the requirements what the necessary course of action is. This readiness standard should explicitly assess implementation capacity, including training availability, enforcement clarity, supply-chain readiness, and affordability impacts, before changes are approved.

We also need a national codes program with a much broader mandate than just writing new codes. It needs to have the mandate to train industry and building officials consistently with the same material. This entity would also issue interpretations and deemed-to-comply solutions (similar to STANDATA in Alberta). This entity may be part of the Federal government, but with a mandate to support and take direction from the provincial/territorial authorities. See the recommendations below for a National Code Interpretation Centre.

To address these challenges, CHBA recommends limiting each code cycle to a defined and manageable number of strategic priorities, approved upfront by the Canadian Board on Harmonized Construction Codes (CBHCC). This would ensure that major changes receive sufficient attention, simplification, and implementation support, rather than being layered alongside numerous other initiatives.

Incomplete Code Change Solutions and Unresolved Issues

Recent code cycles have introduced major requirements leaving the resolution of technical and practical concerns to the next code cycles – 5 years away, which creates ongoing challenges for builders and homeowners. This growing trend reflects a broader pattern of advancing code changes without thorough policy justification or adequate support for industry implementation.

The following examples are but a few that illustrate the situation and implications (more examples and more details are provided in Focus Area 6 - The Technical Changes in the 2025 Codes).

Radon mitigation

The 2025 Code mandates passive radon stacks in every individual home in Canada that is in contact with the ground. CHBA has undertaken extensive work in support of standards development regarding this important health issue.

Although builders and radon mitigators have argued for other proven solutions to be recognized, the 2025 codes lack workable solutions for all home designs, such as providing a capped side-wall vent that could be enabled and equipped with a fan by a mitigator after a homeowner tests for radon. One outstanding item from the previous codes cycle identified in 2019, which remains unresolved, was the possible impact that airtightness has on the interaction of indoor radon concentrations. Other standard practices such as active or capped side-wall venting used in new and existing homes are also not included in the code solutions for new builds leaving the code solutions incomplete.

Lateral load provisions

Early implementation of the new high-wind and seismic bracing rules in British Columbia shows that they are overly complex and stringent, leading to the need for engineering stamps and in some cases geotechnical assessments for many if not all homes in Canada even in low-seismic and moderate wind zones, adding costs upwards to $10,000 per home. This subject was deferred from the 2020 cycle for significant simplification, which remains outstanding. The only truly prescriptive method has 10 strict limitations that make it almost unusable except for very small cubic homes.

Operational GHG requirements

These changes were approved in-camera without any benefits stated, which means that no one knows by how much the proposed measures may reduce emissions in Canada and whether the proposed measures will have any positive effect that exceeds the cost. This lack of rationale, transparency, and evidence cannot be "resolved in the next code cycle". The changes were also approved without any mention, recognition or credit for the only known zero-emission energy source for homes – rooftop solar. While that omission can be fixed for the next code, it creates yet another example of continuously patching up code solutions over multiple code cycles.

These are but three examples amongst a host of others that are emblematic of a development process that has lost its way under too many competing pressures, unrealistic publication timelines, and lack of development principles that would force simple, implementable and adoptable solutions.

Focus Area 2 – Policy Framework

Canada's current code development system shows four major gaps in the policy decision framework gaps:

- affordability is not formally considered in model code decisions;
- (Federal) political direction fed into the new system through the senior management at the National Research Council (NRC) increasingly influences what the code should say rather than being based on scientific evidence and technical analysis by NRC's researchers;
- renovation pathways remain underdeveloped despite their potential to advance climate and housing goals at the same time (and maybe more effectively – as the renovation market is now larger than the new housing market), and
- the CBHCC's policy development itself is neither transparent nor aligned with the government's own best-practice guidelines on regulatory development, with key policies created by officials without possibilities for early stakeholder input and with consultation documents issued as directives rather than neural analyses of all available policy options, including non-regulatory options.

Together, these gaps highlight the need to examine the Board's current policy-development framework to ensure future codes remain practical, affordable, and grounded in research. The following sections describe CHBA's experiences and observations and explore possible solutions.

Policy Development is Not Transparent and Does Not Follow Good Regulatory Practices

The recent and only consultations on policy development under the Board were the Greenhouse Gas policy cases. CHBA observed there the policies were only finalized after technical committees were well into developing technical changes, which – naturally – kept the revisions to any consulted-on document minimal, while the original policy documents were developed by groups of Federal and provincial public servants with minimal input from stakeholders and without following the government's best practices of regulatory policy development.

When policy consultations were finally published, they were 'directions to committees' rather than a comparison of suitable policy options and rationalizing the best policy option among them.

No Consideration for Housing Affordability

National Model Codes lack any formal mandate to safeguard affordability; impact analysis guidelines lag best practice and do not consistently assess cumulative costs or industry capacity (especially small businesses).

Canada's national model building codes are designed to protect health, safety, accessibility, and the environment. In recent years, however, there has been growing concern about the excessive cumulative cost that new requirements are placing on housing affordability. As such, affordability is rightly becoming a more visible factor in provincial policy discussions.

We need to strengthen the link between code development and housing affordability by applying established regulatory development principles more consistently (the national codes do not even follow federal cabinet directive for regulations) and helping committees identify cost-neutral ways to achieve policy goals.

Supporting affordability without compromising safety, performance, or accessibility can be achieved by earlier, clearer, and more consistent cost assessment, by adding an explicit affordability objective, establishing cost-neutrality principles, setting affordability limits for each code cycle, and enhancing training and tools for committees as well as including a small business lens that assesses "soft costs" for small builders, and examines the cost impact of standards referenced in regulations.

This also includes considering cumulative impacts across all code change in one code cycle and considering costs being incurred at the same time from progressing through requirements from previous code cycles (e.g. energy tiers).

Together, these actions would help ensure that future code changes remain effective and adoptable while supporting broader federal, provincial, and territorial housing priorities.

Lack of Evidence and Policy Misalignment

Codes are increasingly shaped by political directives rather than technical evidence. For example, operational GHG requirements were tied to a mandate letter for a Federal Minister for a "zero emissions code by 2024" without any policy-level analysis of how effective the regulation of builders would be compared to regulating the energy utilities towards grid decarbonization. Political directives also include for example the symbolic addition of new high-level objective for firefighter safety based on lobbying of politicians by that interest group, which has been approved for inclusion into the 2030 codes although NRC research was not complete by the time the decision was made in 2024. Code changes should not be approved before benefits have been confirmed to exceed cost and before a comparative policy analysis has confirmed that the code changes reflect the least cost option after analyzing all options including non-regulatory options. These principles should be treated as foundational requirements of the national codes system, not discretionary considerations to be overridden by politicians at their whim.

National codes that are written to comply with Federal government political directives are less reliable because political cycles shift. Political interference into regulatory processes designed to be transparent, consensus-driven, and research-based completely undermine proper regulatory governance and lose the public trust into the legitimacy of the codes. Meanwhile, inappropriately aggressive timelines prevent solid code development, impact assessment, and affordability analysis while also often leading to unintended consequences that lead to other, sometimes very serious problems.

For example, the 2011 National Energy Code – based on a clear policy case, supported by all jurisdictions at the time, was published and adopted with success, while the recent operational greenhouse gas

emission requirements may diverge across provinces leading to inconsistent adoption of codes – depending on the political colours of provincial governments.

While we recognize that political direction is unavoidable in public policy, excessive influence that overrides evidence undermines the very purpose of building codes: protecting people, property, and communities through consistent, research-based minimum standards. All of the guiding principles of federal regulatory policy, including science-first evidence-based decision making should be written into the NRC Act as non-negotiable mandate for NRC's code development role.

Too Much Focus on New Builds

Another example of policy lag is a carefully crafted renovation-focused regulatory policy that could meet climate and housing goals without slowing housing supply, yet national codes continue to focus heavily on new construction instead of incentivizing upgrades across existing stock.

For the first time, the National Building Code includes rules for basic energy efficiency requirements for renovations. Many CHBA Renovators helped to inform these changes. The code sets the requirements for existing buildings at base level requirements for energy efficiency, which have been in place since 2015. Only renovations where energy efficiency upgrades are within scope are affected by these requirements.

While national consistency for renovation requirements may help improve older homes and help achieve Canada's climate goals more effectively by small incremental changes to a large number of homes, enforcement and application to additions would have to follow the newest codes, which may still be challenging.

The new requirements use the phrase "to the extent possible," which triggers a list of meaningful exemptions and relaxations as well as a detailed explanatory note on how practicality should govern when – for example – adding insulation in existing buildings.

Overall, this is promising, as long as renovation pathways are continually incentivized with grants and tax credits tailored to regional conditions and market readiness and as long as it is consistently enforced to drive measurable upgrades with reasonable practicality across the existing housing stock.

Focus Area 3 – National Codes Governance

The new governance system is not delivering what was promised. Recent changes to the governance structure, specifically the replacement of the Canadian Commission on Building and Fire Codes (CCBFC) with the Canadian Board for Harmonized Construction Codes (CBHCC), the NRC's new role as permanent, decision-making Co-Chair of the CBHCC and the Deputy Ministers' Table (CTAHCC-P), and the creation of new National Model Codes Committees, were promised to create a more agile and transparent system. However, residential construction stakeholders (especially NBC Part 9) report reduced transparency, increased complexity and pace, and fragmented representation across 13 committees and 50+ task groups, with the termination of the Standing Committee on Housing and Small Buildings removing a central coordinating forum. The following sections describe CHBA's experiences and observations and explore possible solutions.

NRC's Conflict of Interest Is Undermining the Integrity Of The New System

The National Research Council's changing role from neutral host to voting and permanent chair of top decision-making bodies, while directing staff advising committees, creates conflicts of interest – especially when responding to ministerial mandate letters. In its current role, NRC is no longer an objective support function for sound regulation development, but instead the implementor of political

government policy that can be at odds with principles of sound regulation development – especially because NRC is not the regulatory authority of the model codes it writes.

The governance system should be reviewed with particular attention to NRC's role. Ideally NRC would be place in a role to preserve its technical independence and be mandated to provide full transparency in decision-making processes and to ensure committee decisions are evidence-based and publicly justified. All these principes fall well into a mandate of the primary national research organization with a public policy role on developing building codes.

Sector and Industry Representation at Highest Decision-Making Level Eliminated

While the reversal of roles for the provincial-territorial building safety authorities from advice to decision-making, showed immense potential in speeding up decisions and boosting harmonization potential in decision-making, one aspect of the previous system has been overlooked: decisions were made with the input from all sectors and stakeholders at the table when the decision was made – even during in-camera meetings of the CCBFC's Executive Meeting. This is in stark contrast to the current practice of the CBHCC meeting only twice a year in public and probably around 10 more times in-camera, online and in-person.

The Board overseeing the changes to the Australian Building Code Board also has its state and territorial authorities making the decisions, but in the presence of the national sector representatives, as was the case in Canada previously. The Chair of the ABCB is independent, not like Canada's version where the permanent co-chair is bound to take instructions from a Federal Minister. Similarly, broad sector stakeholders in Canada, such as CHBA, should have a seat on the CBHCC following the ABCB model.

Sector-Wide Coordination for Low-Rise Residential Code Changes Eliminated

With the termination of the Standing Committee on Housing and Small Buildings (SCHSB) and not replacing it with another broad sector committee with a coordinating mandate for Part 9 – a 'code in the code' for low-rise-residential construction – input from the residential construction is no longer adequately provided. Proposed changes are now being developed by 13 committees and 50+ task groups, spreading stakeholders thin and undermining meaningful participation; the tradition of Part 9 as a simple code for low-rise residential construction is at risk. The new process had added undue burden on Part 9 development and is creating undue complexity and cost increases for housing construction.

We need to re-establish a coordinating Part 9 committee for housing and small buildings with strong residential representation to restore coherence and simplicity.

Focus Area 4 – National Harmonization

Harmonization is a rather basic concept and the raison-d'être for National Model Codes. However, the likelihood of harmonization becoming a reality rises and falls with the quality of the code development process and the governance of the code development system, which were the reason for the significant changes to the system since 2022.

Harmonization means the absence of technical variations between provincial and national codes and means the synchronized and timely adoption of the national codes in every province and territory. The following presents a few observations that may influence how much closer we have come to a fully harmonized national code.

True harmonization requires agreement before publication, not adaptation after the fact.

Lack of Affordability in Codes Affects National Harmonization Potential

National building codes are intended to promote consistency and harmonization across provinces and territories, but this objective cannot be achieved if affordability is not treated as a core consideration in code development. When national codes introduce requirements that significantly increase housing costs without clear limits or safeguards, provinces are forced to reconsider, amend, delay, or selectively adopt those requirements. This undermines the very purpose of having national model codes. Affordability is a priority for nearly every province and territory, particularly in the context of ambitious housing supply targets, and codes that do not reflect this reality invite regional variation rather than national alignment. It is therefore completely inappropriate that the federal government, which is supposedly trying to tackle housing supply and affordability, is not making housing affordability a basic principle for developing the national code, resulting in provinces having to step away from it.

The absence of affordability as an explicit code objective or guiding principle exacerbates this fragmentation. Without a formal requirement to consider cumulative cost impacts, committees can introduce changes that are technically well-intentioned but economically unsustainable when layered together. The result is a growing divergence as provinces and municipalities respond differently to cost pressures, implementation capacity, and local housing markets. Rather than delivering harmonized standards, national codes risk becoming a source of inconsistency, uncertainty, and delay. **Addressing affordability in code development upfront is therefore not only essential to housing outcomes, but also fundamental to restoring national harmonization and confidence in the code system.**

Promises in Regulatory Reconciliation Agreement Not Delivered

The Regulatory Reconciliation Agreement for Construction Codes – signed by all provinces and territories in 2019 describes the good intentions for an agile and transformed code system. Except the signatories haven't delivered any reduction of variations or any method of how to avoid them in the future or, if they have indeed reduced national/provincial variations, such as in the 2024 Ontario Building Code, they have not published any evidence of reductions in the five years since the agreement was signed.

The current approach of harmonizing has not evolved much since the 1990s: national code bodies develop changes for 5 years before provincial/territorial officials review them and adapt or adopt them. Even though provincial/territorial staff now participate regularly in technical codes meetings, a significant change of direction is needed where the Canadian Board of Harmonized Construction Codes takes on an active role of approving only national changes for which complete adoption in all provinces and territories is guaranteed.

One obvious advancement would be to have all provinces be able to review the proposed code in detail, assess adoption, and come back together to land on what everyone can do together. This could be achieved by publishing a 'draft code', which would also allow standard developing organizations to update their standards to new requirements in codes. This would improve the current system, which publishes the code in year 5 and then puts the pressure on each individual province to determine what they will adopt, what they won't, and what they will change (leading to significant dis-harmonization). See below.

Vision of a Harmonized-When-Published Code

CHBA envisions a truly harmonized national codes, that collects all necessary agreement before publication and does not rely on adaptation or partial or delayed adoption after the fact. This would necessitate a new role for the Canadian Board on Harmonized Construction Codes (CBHCC) as equalizer for all variations.

Taking the 2025 national codes as an example, one possible pathway envisioned by CHBA would be to publish the code in its publication year as a DRAFT (say at the end of 2023), which would then be reviewed by provincial/territorial governments for a full year (say until the end of 2024). Canadian Board on Harmonized Construction Codes (CBHCC) members would then agree – on behalf of their governments – on a set of changes they can all adopt necessitating final revisions to be agreed to by all provinces and territories (say by mid 2025) and then, a fully harmonized 2025 National Code could be published and downloaded for free.

Any changes that weren't agreed to in the harmonized code could be published as a voluntary 'code-plus' supplement, which jurisdictions can incentivize but not mandate. This new core code should be supported by a national training and implementation program to ensure builders, designers, and officials receive consistent guidance across all jurisdictions.

This system could lead to consistency, which in turn could lead to increased productivity in the industry.

Focus Area 5 – Inconsistent Local Interpretation and Application Nationwide

As building codes become more complex, inconsistent interpretation and enforcement at the municipal level have become a major barrier to productivity, affordability, and housing delivery, hindering the industry's ability to support the federal goal to build 500,000 homes per year.

Consistent code interpretation would dramatically increase productivity, and therefore this focus area outlines the case for a National Building Code Interpretation Centre as a practical way to improve consistency and predictability in how national codes are applied, while respecting provincial authority and clearly defining the limits of a national role.

CHBA recommends creating a National Building Code Interpretation Centre (NBCIC) modelled on Alberta's STANDATA, bringing together government, industry, and municipalities to produce consistent, transparent, public interpretations adopted by provinces and territories.

Why a National Interpretation Centre Is Needed

Inconsistent interpretation and application of the same building code requirements across different municipalities and even within the same municipality has become a significant drag on industry productivity and housing delivery. Builders routinely face delays, redesigns, and added construction, financing and administrative costs simply because identical code provisions are interpreted differently from one municipality to the next, and sometimes even between officials within the same jurisdiction (or "desk-to-desk" as some call it).

This undermines replicability of housing designs, increases construction costs, and makes productivity gains – such as modular and factory-built construction, which rely on repeatability – difficult to achieve at scale. These local-level inconsistencies negate much of the economic benefit expected from national and provincial code harmonization and directly affect affordability, delivery timelines, and the industry's capacity to increase housing supply.

How a National Interpretation Centre Could Work in Practice

A National Building Code Interpretation Centre would provide a single, authoritative source of binding interpretations of national model code provisions, applicable across all jurisdictions that adopt those codes. Hosted by the National Research Council and operating under the oversight of the Canadian Board on Harmonized Construction Codes, the centre would issue nationally consistent interpretations, technical clarifications, and deemed-to-comply solutions through a publicly accessible, searchable

portal. Interpretations would be developed using existing committee expertise, approved by the Codes Board, and then formally adopted by provinces and territories, ensuring that the same provision means the same thing in every municipality. This approach would reduce uncertainty, accelerate approvals, lower compliance costs, and support consistent training and enforcement. In addition, it would reduce the workload of municipal building officials and help address limited municipal resources while also feeding real-world interpretation issues back into future code development.

Making A National Code Interpretation Centre Work

For the model to succeed, several foundational issues must be addressed, particularly around governance, authority, and scope. Provinces and territories would need to formally adopt and enforce national interpretations through legislation or administrative policy, just as they adopt the national code itself, though they would, of course, retain their constitutional authority over building regulation. In so doing, they would also need to regulate that municipal officials abide by these published interpretations. The centre's mandate would be clearly limited to interpreting national model codes only, not provincial amendments or local variations (though hopefully these would be minimal and continually reducing over time), to avoid jurisdictional overreach and to ensure it does not become a general local technical advisory service.

Provincial buy-in would likely depend on clear guardrails around authority and neutrality. The following summary of conditions attempts to capture what would make a national interpretation centre workable and acceptable from a provincial and territorial governments' perspective:

- provincial authority clearly preserved and reinforced
- a trusted national reference to support local decisions (such as CCMC)
- measurable reduction in red tape
- clear affordability and consumer protection benefits
- a narrow mandate focused only on national codes
- direct support for internal trade and labour mobility
- clear purpose without over-prescribing operations
- strict technical neutrality, free from advocacy

Addressing all these issues upfront is essential to having the centre a success and to building trust with provinces and municipalities.

Focus Area 6 – The Technical Changes to the 2025 Codes

This section examines the major 2025 National Construction Code changes to explain how they affect housing cost, complexity, and implementation in practice. It distinguishes between changes that close real gaps, correct errors, or are largely cost-neutral, and those that add significant cost, complexity, or risk and are not yet ready for broad adoption.

Where changes deliver clear benefits, such as improved clarity, corrected technical errors, or better long-term performance, those benefits are acknowledged. Taken together, this assessment supports CHBA's request to pause adoption so that governments can retain simple, effective improvements while revisiting costly or premature requirements, with the goal of achieving codes that are affordable and practical and therefore are also adoptable.

CHBA recommends that provinces focus on adopting cost-neutral, error-correcting, and gap-filling changes – particularly within Part 9 – while deferring requirements that introduce significant cost, complexity, or unresolved implementation risk.

Some Changes Are Good, Some Are Problematic

This section provides a high-level snapshot of the 2025 code changes, distinguishing between measures that close gaps or correct issues and those that add significant cost, complexity, or are not yet ready for implementation. A detailed discussion of the most significant changes, including rationale, cost impacts, and implementation concerns, is provided in the sections that follow.

Changes that close gaps, correct errors, or are cost-neutral

Most of the measures below focus on fine-tuning and optimizing energy efficiency rules that had been added in 2015 and 2020:

- **Prescriptive Points Trade-Off System for all energy tiers** close a major gap by enabling prescriptive compliance across all tiers
- **New Energy Use Metrics (EUM)** add a practical compliance option for small and compact homes
- **Energy Efficiency Requirements for Renovations** refocus the effort on existing housing stock and being practical – many of the rules are cost-neutral and reflect current renovators' practices.
- **Peak Cooling Criteria** corrects a known issues in the 2020 tiered code and provides a real reduction of unintended risk of overheating in high-performance homes
- **Sealing of Joints in Polyethylene Beneath Slabs for Radon Protection** adds a simple, low-cost improvement with meaningful benefit

Changes that add cost or complexity, or are not ready for implementation

- **Adaptability, Visitability, and Accessibility in Housing** removes the exemption for houses from the objective without a policy discussion, which means accessibility may now apply to single-family, private-market housing, dramatically driving up costs for the next generation of buyers
- **Operational Greenhouse Gas Emissions** were added with an incomplete policy framework in place, for example solar PV is not recognized, and costs are high and benefits were not stated
- **Lateral Load Requirements** remain overly complex and disproportionate to risk, particularly for the low to moderate wind loads that now inappropriately trigger these requirements across Canada with no evidence of structural failures to drive this expensive change
- **Radon Protection (Passive Stack Only)** relies on a single acceptable solution and leaves other proven options out that are more effective and appropriate in many instances
- **Future-Adapted Climatic Loads** were added without clear communication on where they apply and what the implications are for many locations. Without understanding clear regional implications and cost-benefit, these changes may risk raising housing costs unevenly with no clear safety or resilience gain.
- **Door and Windowsill Protection and Insulation** is inconsistent with CSA A440.4 (2019) called up by the code creating conflicting regulation, and was advanced without sufficient due diligence by committees to review the risk of condensation resistance which can cause durability issues

Accessibility, Adaptability, and Visitability

The 2025 National Building Code removes the exemption for houses from the accessibility objective, extending adaptability requirements to all housing and visitability requirements to homes in multi-unit buildings with a barrier free entrance (based on a given percentage between 0 and 100% which is set by the authority having jurisdiction (AHJ). Adaptability requirements include grab bar backing for bathtubs, showers and toilets, a wider entrance door, and lower light switches. Visitability features applied at levels set by local authorities include a washroom with a turning circle and wider entrances to living areas. These additional space requirements are incredibly expensive given the costs of construction and often create

spaces less desirable to customers. While pro-accessibility advocates claim these are not real costs, they are simply design choices, the fact of the matter is that adding space for wheelchair turning radiuses takes away space elsewhere. For example, a larger powder room can mean a smaller hallway closet, diminishing appeal for buyers and sending them to the existing housing market instead, driving up prices for more housing options that have become more attractive because they haven't had these undue requirements placed upon them. Developers repeatedly report accessible units being hard to sell, and often witness major retrofits to remove accessible features and create better use of space for able-bodied owners who ultimately occupy the space.

CHBA costing indicates the adaptability measures which would apply to all homes add approximately $2,100 per home once labour impacts are included, while the visitability requirements not included in CHBA's assessment were estimated to range from $7, 561 to $14, 224.

While some adaptability features may support aging in place, applying the accessibility objective broadly to private housing will increase cost, and reduce design flexibility substantially, if future code cycles expand requirements without affordability limits and without consideration of other non-regulatory policy options. By including housing under the accessibility code objective this will also limit consumer choice and may have a negative impact on the housing market.

A pause would allow governments to separate targeted, cost-effective accessibility measures from broader requirements that are not yet ready for mandatory nationwide application in housing.

Two other important policy considerations are also necessary: 1) there are 16 million existing housing units in Canada, almost all of which can be retrofitted to adapt to accessibility needs of households as required, for a fraction of the societal costs, but that are less expensive and more attractive to most purchasers than the units that would be required to be built under the accessibility and visitability requirements of this code. And 2) the cost of accessibility requirements should not be borne by all buyers (the vast majority of which fortunately do not need them), but by governments who can in turn provide these units to those who need them on whatever cost-recovery or subsidization approach they wish to pursue.

Additional Context on Accessibility Policy and Housing Choice

CHBA supports accessibility for facilities and services open to the public, including public spaces within residential buildings, and recognizes the importance of ensuring that all individuals can participate fully in society. At the same time, CHBA has consistently emphasized that Canadians' homes are their owners' private spaces that they have the right to tailor to their individual needs, preferences, and budgets. Applying accessibility, adaptability, or visitability requirements broadly to the interiors of private homes risks undermining this fundamental right, drives up housing costs, and reduces housing choice. CHBA maintains that mandatory accessibility requirements inside private dwellings are not an effective or equitable way to meet diverse needs of society, particularly when those requirements apply regardless of whether occupants require or want them.

CHBA has also highlighted that accessibility needs are highly individualized and often evolve over time. Different disabilities and age-related conditions require different home features, some of which can conflict with one another. Blanket requirements embedded in building codes are therefore unlikely to meet the actual needs of occupants and may even be counterproductive. CHBA's Adaptiv Home program, aimed directly at renovating housing for aging in place and those of any age with disabilities, demonstrates that voluntary, client-specific renovations supported by training and information are better suited to delivering safe, functional, and affordable outcomes for households, particularly when applied to Canada's existing housing stock. Blanket approaches are inappropriate and excessively – custom

approaches to specific needs should be the path forward, both in new construction and renovating for household needs.

Cost, Space, and Market Impacts of Mandated Accessibility Measures

The evidence reviewed by CHBA shows that while some adaptability measures can be cost neutral or low cost, broader accessibility and visitability requirements carry significant financial and spatial implications. NRC and third-party studies indicate that mandatory adaptability measures proposed for the 2025 codes add several hundred dollars per unit, while visitability requirements can add thousands of dollars per dwelling due to increased space needs for wider corridors, larger washrooms, and barrier free paths of travel. In ground-oriented housing, these requirements may necessitate wider floor plans than narrow lots can accommodate, while in multi-unit buildings they reduce usable living space and can result in fewer units being constructed overall.

Industry experience further shows that accessible or visitable units are often more difficult to sell in the private market unless there is a specific buyer need, increasing financial risk for builders and developers. Mandating percentages of visitable units without corresponding demand push costs onto all buyers and reduce overall housing supply. Governments seeking to expand accessible housing outcomes should prioritize incentives, funding, or publicly delivered accessible units, rather than embedding high-cost requirements into national codes that apply indiscriminately to private housing and exacerbate affordability pressures.

Alterations to Existing Buildings

The 2025 codes introduce national energy efficiency requirements for renovations tied to the Section 9.36 Tier 1 baseline. This closes a long-standing gap in positive fashion by focusing on improving existing housing stock, rather than concentrating performance expectations on new homes.

CHBA supports the introduction of national requirements for alterations to existing buildings, particularly where they focus on energy efficiency improvements during voluntary renovations. Renovations present an opportunity to improve performance in the existing housing stock, provided requirements are reasonable, practical, and limited to the scope of work. The creation of a dedicated framework for alterations is viewed as a positive step toward clarity and national consistency when applied carefully.

While CHBA considers most of the requirements as cost neutral, some concerns remain around the enforcement of the new requirements, particularly where additions could trigger full new-construction requirements.

A pause would allow the renovation provisions to be implemented with proper supporting local process nationally, enabling implementation with care and clear guidance without being undermined by system-wide implementation overload.

Scope and Application of a new NBC Part 10 on Alteration of Existing Buildings

CHBA supports the creation of a new Part 10 on Alteration of Existing Buildings, including provisions that define scope, application, and exemptions. Clear application language is seen as essential to helping renovators, designers, and authorities having jurisdiction understand which requirements apply to alterations versus new construction. CHBA's support is contingent on ensuring that the framework does not inadvertently trigger full new-construction compliance for routine renovation work or retroactive application of the requirements to existing building stock or – even worse – mandating the energy efficiency requirements for any renovation (regardless of whether energy efficiency is within the scope of the project). Clear implementation guidance – that is consistent across the country – is therefore needed

and must be available in tandem, rather than simply publishing the code and leaving implementation to catch up in ad hoc fashion, further undermining harmonization.

Energy Efficiency for Alterations (Section 10.9)

CHBA supports the introduction of energy efficiency requirements for alterations, recognizing that voluntary renovations provide opportunities to improve building performance, where substantial GHG savings are available, versus the minor marginal gains that come with new construction by comparison. CHBA Renovator Members have noted that many of the proposed requirements align with current good practice and existing market-available products, resulting in low or manageable impacts when properly applied.

Useful Explanatory Notes and Clarifications

CHBA recognizes the many explanatory notes that clarify that alteration requirements apply only to the extent of the renovation, not the entire building. These clarifications were highlighted as particularly helpful in preventing misinterpretation, unnecessary work, and additional costs during renovation projects. However, per above, clear and nationally consistent implementation guidance will be critical to avoid scope expansion locally that would drive up complexity and cost (and drive projects into the underground economy).

Door and Windowsill Protection and Insulation

The 2025 codes correctly mandate moisture protection at all door and windowsills and in the rough stud opening, which is considered good practice, and something that CHBA has advocated for as it finally addresses the unintended consequences (higher risk of water intrusion) in the wider profile of energy efficient building envelopes. CHBA costing indicates this change adds approximately $350 in CHBA's archetype home with 9 openings once materials and labour impacts are included.

However, the code also changed the insulation requirements within the rough stud opening under windows to support drainage by way of reducing the amount of insulation installed under the window. This represents a major shift in practice for many builders, particularly in regions where face sealing and low-expanding spray foam insulation in the rough stud opening are currently used to achieve airtightness and to ensure occupant comfort. While resolving the moisture protection issue is a positive change, this change creates a new technical issue that may lead to durability issues, which makes this another example of rushed code development without due process that could lead to problematic unintended consequences.

While sill protection itself may reduce moisture-related failures – especially in thicker energy efficient building envelopes – which is something that CHBA is supporting, new technical issues have been created with the 2025 code as written, including potential condensation risks, conflicts with CSA 440.4 installation requirements (for insulation around windows) currently referenced in the 2020 and 2025 code, and the absence of a full committee review of the underlying NRC research.

A pause is needed to allow time for technical issues to be resolved and for guidance to be finalized before nationwide implementation and practical issues like trade sequencing and scheduling to be addressed. It is also essential that conflicts between the code and the CSA standard that is referenced by the code be addressed and corrected. All of this would help avoid unintended consequences and provide necessary industry assurances that there will not be durability issues around condensation.

Radon and Soil Gas Ingress

The 2025 codes introduce a requirement to seal overlapping joints in the polyethylene that is in contact with the ground and for polyethylene in crawlspaces to be protected with ballast. CHBA supported these requirements but also the recommendation for NRC to carry out research on other options for protection of polyethylene in future codes, which has not been completed, yet.

The 2025 codes also introduce mandatory passive radon stacks for all homes in contact with the ground, building on the rough-in approach that has been in the national codes since 2010 codes with a prescriptive requirement and performance option. This change responds to Code Change Requests (CCR) from the Government of British Columbia where this requirement has been mandated for some regions. The change is also intended to correct issues found by mitigators who often report that the rough-ins are in the locations that do not allow connection to a stack terminating at the side wall or roof, which negates the idea of saved money and effort by pre-installing a rough-in for new homes.

CHBA costing places the added cost at approximately $2,100 per home once labour impacts are included, and builders have identified significant constructability challenges. Passive stacks can be difficult to route in many new home designs, they also require unusually high insulation levels in unconditioned spaces and very importantly may not reliably reduce radon concentrations in all cases, leading to a false sense of security for homeowners that is difficult to navigate for builders. Activation of a passive stack with a fan may also require the stack to be insulated in the conditioned area of the home to prevent condensation.

The fundamental problem is that the new requirement for passive stacks narrows acceptable solutions rather than expanding them to others that may be more suitable for smaller and narrower housing forms, and that the requirement shifts the focus from construction requirements in previous codes to implying acceptable radon concentrations in homes (although the code language does not directly say that), resulting in risks to builders that are far beyond the builders' control. How codes impact the risk and liability of builders and renovators is not well understood by code development committees, but this can have grave consequences on a subject like radon.

A pause would allow radon mitigation to be addressed through flexible, evidence-based options rather than a single, prescriptive approach. CHBA has consistently advocated for multiple proven options, including capped side wall vents and active systems. A pause would also allow for proper policy guidance and thorough provincial review to better align risks and liabilities to the benefit of all.

An Effective Solution for Industry

CHBA has long proposed that the 2025 requirements should be repositioned to align with the long-standing radon policy approach established in the 2010 code, which focuses on construction specifications rather than implied performance outcomes that cannot be controlled by the builder at the time of construction. Under the envisioned approach, builders are responsible for installing defined building elements, without any expectation or implied obligation to achieve a specific post occupancy indoor radon concentration. And - it is made very clear in the code and in additional guidance documents that the responsibility for testing, monitoring, and any subsequent mitigation after occupancy rests with the homeowner, once the builder has met all applicable construction requirements. Without a return to this approach, undue risk and liability is unfairly placed on builders, giving a false sense of security to home owners and driving up costs, all of which will at some point lead to major issues in the public arena that must be better handled through proper policy development now – that places construction solutions, risk mitigation and testing responsibilities with the right players. This includes better policy from warranty

providers to manage builder risks and consumer expectations, while also clearly placing the responsibility for post-occupancy testing with homeowners.

To support this policy position, the proposed changes should be revised by retaining the currently proposed passive radon stack solution, consisting of an uncapped, roof terminated vent. But in addition, new compliance options should be added, including an active sidewall venting system and an inactive capped sidewall vent designed to facilitate future mitigation. These options would allow builders to use mitigation approaches that are already widely and successfully applied in existing buildings. Passive stacks cannot be integrated into all home designs, and in high-radon regions where an active system is necessary, such as Elliot Lake, ON, a passive stack would be redundant adding wasted costs during construction for homeowners.

The revised requirements should therefore include clear language confirming that the code applies only to construction specifications and does not intend to establish acceptable outcomes for occupants based on measured indoor radon concentrations in the future. Finally, a reference to the 2024 CGSB Standard CAN/CGSB-149.11 for new buildings should be added to provide clarity and consistency in the application of radon mitigation systems. Similarly, and looking forward to the 2030 codes when alteration to existing buildings could address radon protection, CHBA would suggest that a reference to the 2024 CGSB Standard CAN/CGSB-149.12 for existing buildings would be a suitable approach.

Note that when these standards were initially rushed to publication, they were fraught with similar and significant problematic shortcomings that had the potential to lead to disastrous outcomes. CHBA engaged accordingly and since then both standards have been amended to be solid well-developed standards. While the standards should not have been published in their first iterations as they were, CHBA applauds the government (Health Canada, NRC Construction Research and CGSB) for amending them appropriately. However, moving forward, all codes and standards must avoid that approach and need to be fixed before being published and regulated, to avoid the current precarious situation with the 2025 code and the code system, hence CHBA's call for a pause.

Risk and Liability Implications of the Proposed Radon Requirements

CHBA has raised significant concerns that the proposed 2025 National Building Code radon changes represent a fundamental shift in risk allocation that could materially increase builder and renovator liability, irresponsibly driving up costs. By requiring the installation of passive radon stacks, the Code may be interpreted as implying an acceptable indoor radon outcome, even though radon concentrations can only be measured after occupancy and may vary over time, including through natural shifts/changes in conditions or the structure, or changes by the homeowner. This creates a risk that builders could inappropriately be held responsible years after construction if radon levels exceed Health Canada's action limit, despite having complied fully with the Code at the time of construction.

CHBA has further warned that this implied performance expectation could trigger extended home warranty obligations, as is already inappropriately the case in Ontario's Tarion model, in jurisdictions where no such liability currently exists. Compounding this risk, statements from lung cancer advocacy groups that increased airtightness may raise radon risk have not been resolved by codes committees, raising the possibility that builders could face liability simply for complying with high-performance energy efficiency requirements. Should that come to fruition, it will actually be codes bodies that are liable for the situation they have caused, as builders are obligated to follow code.

In the absence of clear code language that limits builder responsibility to construction specifications and explicitly assigns post-occupancy radon management to homeowners, the proposed requirements introduce legal uncertainty, unquantified liability exposure, and potential insurance and home warranty

impacts across the residential construction sector that will drive up costs and at some point will certainly result in bankruptcies driven by improper policy and warranty, without proper solutions.

Unrealistic and Uninformed Code Development Views that Must Be Changed to Reflect Reality

Committees and legal experts maintain that the proposed radon, energy-efficiency, and alteration-to-existing-buildings requirements only increase the risk of liability by adding more detailed construction and inspection rules, rather than by creating an obligation to ensure acceptable post-occupancy radon levels. This is confirmed by assertions that radon levels cannot be reliably predicted before occupancy, which highlights that testing and mitigation falls to homeowners after move-in and cannot be reliably proven at the time of construction. If regulatory and policy action at the local level, including warranty policy, upheld this, that could mean that builders are not assuming liability by complying with codes unless there is negligence, a breach of duty, or non-compliance with code requirements.

While this framing by legal experts would offer some reassurance in principle, the reality is that such distinctions (focus on construction rather than promise of acceptable indoor concentrations) are often not maintained in practice, particularly given how homeowners, home warranty providers, insurers, and regulators currently function. As such, warranty programs and courts may (and currently in some cases do) interpret code-mandated radon measures as implying acceptable in-home radon concentrations, or how expectations around duty of care may evolve regardless of technical compliance. This is unacceptable and needs to be addressed directly in code guidance and through hands-on engagement by the codes system working with provincial authorities, including home warranty programs, to get the roles, responsibilities and liabilities correct.

Overheating Risk Addressed for Highly Energy Efficient Homes

CHBA supports changes to reduce overheating risk because they directly address long-standing concerns with how peak cooling load is currently regulated under the 2020 National Building Code.

As documented in CHBA's analysis from 2022 (see Peak Cooling Backgrounder), the approach introduced in the 2020 tiered energy codes relied on a strict pass-fail comparison to a reference house. The peak cooling criterion is one of three mandatory criteria to comply with the tiered codes (after envelope heat loss reduction targets and overall energy use reduction targets).

However, the peak cooling criterion did not reliably reflect real-world overheating risk, occupant comfort, or proven high-performance outcomes. Evidence from thousands of Net Zero Ready homes showed that many well-performing homes failed the peak cooling criterion despite low overheating risk, while other homes could technically comply yet still be prone to overheating. This is another example of the current flaws of the national code development system, with changes being rushed and leading to problematic unintended consequences. Note that CHBA was warning of this problem in the 2020 code development process, but those concerns were overridden in the name of urgency, instead creating dangerous overheating problems in housing built to code. This type of 'publish-it-now-fix-it-later' code development must stop, hence the need to pause all things code and address the code development system itself in the process.

For obvious reasons then, CHBA supported this change. It corrects this misalignment and better reflects how homes actually perform in practice. The 2020 approach applied a uniform national threshold that was not climate-sensitive, penalized reasonable fenestration and orientation decisions, and ignored whether mechanical cooling was installed and whether heat load reduction measures (e.g. shading) were managing overheating risk. CHBA advocated for a framework that aligns with established industry

practice, including approaches already validated through the CHBA Net Zero Home Labelling Program, where overheating risk is addressed holistically rather than through a single modelling metric. The supported changes reflect this request by restoring flexibility while maintaining appropriate safeguards for occupant comfort and health.

Finally, CHBA supported these changes – and worked with the fenestration industry to develop a prescriptive equivalent to maintain the intent behind the peak cooling criterion for builders who do not use the performance path – because the changes improve coherence between energy efficiency objectives, overheating prevention, and constructability. The change involves setting maximum solar heat gain coefficients for windows based on climate zone and the number of windows in a home – a very reasonable and practical approach.

By resolving the technical and policy issues previously identified, the revised approach avoids disqualifying otherwise high-performing homes and reduces the need for unnecessary design trade-offs that can increase cost and carbon impacts.

With these issues addressed, CHBA views the changes to reduce overheating risk as a constructive and evidence-based improvement that supports affordability, design choice, and climate-appropriate housing performance while continuing to protect occupants from overheating.

New Prescriptive Method for Energy Efficiency in New Construction

The 2025 code expands the prescriptive compliance paths for all 5 energy tiers in Section 9.36, closing a gap in the 2020 code where tiers 3 to 5 were only available as targets under the performance path.

Under the circumstances, CHBA supports this change because it enables a simple compliance method previously not available. However, CHBA remains concerned given costing estimates show the incremental costs of approximately $5,700 for Tier 2, $9,600 for Tier 3, $20,300 for Tier 4, and $57,600 for Tier 5 per home.

The added costs are substantial, which is why CHBA is asking for a pause that would allow the industry and consumers to absorb these compliance costs from previous codes before adding on those of the 2025 codes. CHBA has also long called for more research investment for innovation to bring down these costs before moving ahead with regulating these measures and has submitted a code change request to downward adjust tier 5 performance target to 60% (from 70%) which aligns with the outcome of CHBA-labelled net zero energy homes

Related thereto, to truly address energy reduction and GHG emissions in housing, it is the existing housing market, consisting of over 16 million homes, almost all of which use more energy than newly built homes, that must be targeted.

Introducing Simplicity with a Point-Based Compliance Method

The National Building Code's tiered energy efficiency framework has included a prescriptive points compliance path since 2020 for tiers 1 and 2. It now includes a complete set of targets for each tier under the *trade-off points method*, which is built around Energy Conservation Measures (ECMs) and Energy Conservation Points (ECPs).

- ECMs are specific design choices or equipment upgrades that improve a home's energy efficiency, such as more insulation, more efficient heating or better windows and doors
- Each Measure (ECM) 'earns' an assigned number of Points (ECPs) that reflects its relative contribution to reducing energy use, for example, more insulation in a wall earning more points (ECPs).

Under this approach, builders demonstrate compliance by selecting ECMs that together achieve the minimum required number of points for a given energy tier, rather than by modelling a home's energy performance against a reference house. Each tier has a clearly defined points target, and builders can mix and match measures across the building envelope, mechanical systems, and service water heating. (The method also includes a building-envelope backstop, which requires that a minimum portion of points come from envelope measures, ensuring good building-science practice and preventing compliance based solely on high-efficiency equipment.)

Lack Of Prescriptive Requirements Slowed Market Learning

When the 2020 National Building Code introduced tiered energy requirements, the prescriptive trade-off path was only partially implemented, with points-based compliance available for Tier 1 and Tier 2 only. CHBA had asked that the points method be fully developed for higher tiers before the 2020 code was published, recognizing that a significant portion of builders – particularly in smaller, rural, and regional markets – do not have reliable access to energy advisors or energy modelling services required for the performance compliance path (when the prescriptive trade-off path was not available for higher tiers). That request was not acted upon, and the code was published with limited prescriptive options, making performance modelling the only pathway for higher tiers. In practice, this created a barrier to participation in higher tiers, and slowed market learning and uptake.

Straightforward Compliance Method leads to Gradual Market Transformation

The completed prescriptive trade-off points method now addresses that gap. It enables compliance with higher energy tiers without energy modelling, relying instead on transparent tables and straightforward calculations. This makes tiered compliance accessible to a broader range of builders and project types and provides a practical entry point for understanding and trying out higher energy tiers. Builders can see, in concrete terms, how incremental upgrades translate into points and higher tiers, test different combinations of measures, and understand cost-performance trade-offs without committing to full performance modelling. In this way, the prescriptive trade-off path functions not only as a compliance tool, but also as a bridge that supports gradual market transformation, learning, and confidence in higher-tier construction.

Given the higher costs of higher tiers, and the need to slow adoption to recognize the housing affordability crisis and provide time to develop cost neutral solutions, these points based approaches can support voluntary adoption of higher tiers very easily, which could also be incented through government and utility programming, to help market transformation, increase industry capacity, and drive innovation until more affordable options are proven out.

However, it should be noted that the 2025 trade-off points method also ties energy conservation points for better airtightness at any tier to a blower-door test, creating cost and availability risks where energy advisors are not otherwise required, but also creating a learning opportunity for builders to buy a test kit and have a crew-member certified as airtightness testing technician. This critical step in understanding and managing the importance of airtightness for energy efficiency and building science would contribute to a market transformation of optimized and cost-effective high-performance building envelopes.

New Energy Use Metrics Helping Compact Homes

The 2025 codes added a new compliance method that strengthens the energy efficiency framework by adding a clearer, more predictable option alongside existing prescriptive and performance paths.

CHBA supports this because it closes a gap in the tiered energy system and provides builders and designers with a more direct way to demonstrate compliance based on actual energy outcomes,

which offers advantages particularly for compact and efficiently designed homes, for which builders and energy advisors have struggled to demonstrate compliance under the other methods.

The Energy Use Metrics path:

- seeks to limit total energy use, not just relative improvement,
- sets fixed targets for annual energy consumption, space heat loss, and cooling load, and adjusts them for climate, house size, and tier level
- avoids distortions created by reference-house modelling,
- removes unintended advantages for larger or less compact house designs that may otherwise comply despite higher absolute energy demand, and
- simplifies administration and calculation, since targets can be derived directly from climate data and building characteristics without generating a full reference model

This method improves clarity, fairness, and implementation readiness. The performance targets are transparent, calculations are more straightforward, and administration is simpler for both code users and authorities having jurisdiction. More importantly, this is an additional compliance option, not a mandate, which allows for market learning and gradual adoption. Overall, adding this new method strengthens the energy provisions by supporting more affordable homes.

Operational Greenhouse Gas Emissions

The 2025 codes introduce operational greenhouse gas requirements tied to provincial emission factors. CHBA estimates added costs of approximately $30,000 per home including labour, with large regional variation and no credit for on-site solar generation.

This high-cost and policy-driven framework is not yet ready for implementation and warrants reassessment before adoption.

Insufficient Policy Case for Regulating Housing with Operational GHG Emissions

CHBA supports the inclusion of greenhouse gas emissions within the scope of the national model codes in principle, as affordability allows, but notes that ambitious energy efficiency levels up to tier 4 provide already a substantial reduction of emissions by reducing energy demand, which has not been accounted for.

CHBA has consistently raised concerns that the policy framework underpinning the operational GHG provisions is not sufficiently developed or justified. In particular, CHBA has noted that the policy materials do not clearly demonstrate how much of Canada's total operational emissions from buildings can realistically be influenced by building codes (which only address heating, cooling and water heating energy), how those reductions compare with other policy instruments, or how expected emissions reductions differ across building types (low-rise vs high-rise) and regions with varying fuel mixes. Without this clarity, it is difficult to assess whether building codes are the most effective and appropriate tool to achieve the stated policy objectives, or whether other measures such as grid decarbonization, incentives, or voluntary programs would deliver greater reductions at lower cost for Canadians. This analysis has not been done, which is a major shortcoming that contravenes the federal government's own guiding principles of federal regulatory policy although this change was politically driven by the federal government.

CHBA has also emphasized throughout the code development process that affordability has not been adequately integrated as a guiding principle into code development, especially for the operational GHG policy framework. While the policy documents reference long-term savings and economic opportunity,

they do not acknowledge that achieving those outcomes requires significant upfront capital investment by homeowners. CHBA has cautioned that without explicit consideration of affordability, the introduction of new GHG objectives risks compounding existing housing cost pressures and penalizing smaller or more modest homes, which already have lower total energy use and emissions. In addition, the Canadian Board of Harmonized Construction Codes has repeatedly refused to acknowledge that operating electrified homes may come at a significant cost premium compared to heating them with gas – despite energy savings (from operating a home over years) are routinely assumed as benefits.

Concerns with the Structure and Fairness of the Proposed Technical Requirements

At the technical level, CHBA has raised fundamental concerns with the structure of the proposed operational GHG requirements, particularly the reliance on fixed, grid-based emission factors that are outside the control of builders and homeowners. Under the proposed approach, identical homes can achieve very different GHG performance levels solely based on provincial electricity emission factors, creating uneven and inequitable outcomes across the country. In provinces with higher-emission grids, even highly efficient all-electric homes may be unable to achieve higher performance levels, while less efficient homes in jurisdictions with low-emission grids may easily comply.

Further, CHBA has consistently identified the failure to recognize on-site, zero-emission energy generation, particularly solar photovoltaics, as a critical flaw in the proposed requirements. On-site renewable energy is one of the few levers directly within the control of builders and homeowners and offers a clear, measurable way to offset operational emissions. Excluding this option not only undermines the stated emissions-reduction objective but also removes an important pathway for builders in higher-emission regions to improve performance without wholesale changes to heating systems or building design. There are many technically sound methods to incorporate on-site renewable generation into compliance calculations, many of which CHBA has proposed, none of which are reflected in the 2025 code.

Implementation Readiness and Cost-Benefit Concerns

CHBA has also expressed concern that the operational GHG requirements are being advanced without a complete and transparent impact analysis that compares the expected emissions reductions (for each anticipated level of performance) against the incremental costs imposed on homeowners (for the respective level). While the proposals reference energy efficiency equipment costs, they do not quantify the cost of switching energy sources, upgrading electrical infrastructure, or the regional cost differences associated with grid intensity. Nor do they provide a national estimate of the emissions reductions that would be achieved at each performance level. Without this information, governments and stakeholders cannot determine whether the societal benefits of the proposed requirements outweigh their affordability impacts.

Finally, CHBA has warned that introducing operational GHG requirements in their current form risks undermining code harmonization and implementation readiness. The absence of simple, robust prescriptive pathways, the increasing length and complexity of Section 9.36, and inconsistent terminology between “tiers” and “levels” all add unnecessary complexity for builders and enforcement officials. CHBA has recommended reorganizing the requirements into a dedicated section, aligning terminology with the NECB, and ensuring prescriptive and performance options are published together to support practical, timely adoption.

A pause would allow these foundational issues to be resolved, ensuring that operational GHG provisions are effective, equitable, and implementable across all regions.

Lateral Loads and Structural Requirements

The 2025 codes introduce nationwide requirements for increased wind and seismic resistance, extending rules previously limited to regions having a high-risk for earthquakes. These changes require thicker sheathing, more fasteners, and more complex compliance pathways, but rely on a complicated design approach (involving table look-ups, factors and formulas) to find out exactly how much sheathing is required and where it needs to be installed.

CHBA estimates added costs of approximately $10,500 per home, with higher costs (up to $30,000 and more) being experienced in real-world examples in British Columbia where engineering and geotechnical studies are involved. Early experience shows complexity leads to increased professional reliance even in moderate-risk areas because the requirements are so complicated that building officials cannot easily enforce on-site without a lot of training and practice and instead are requiring expensive engineering designs.

This 2025 code change shows that complexity itself has become a barrier to effective code implementation and compliance and warrants review and significant revision before it is adoptable.

A pause would allow simplification and better alignment between risk and requirement. There is also the very real need to assess where these requirements are truly appropriate. With no examples of structural failures in hurricane-force gales on new housing built to the existing code, the extreme cost and complexity burden the new code brings is completely unnecessary, its rationale unsubstantiated, and its impacts completely unacceptable.

The Voice of Industry Being Ignored Leads to Complexity in Codes

Across all its public review comments over two code cycles, CHBA has consistently raised concerns that proposed lateral load provisions for Part 9 buildings have become overly complex, difficult to interpret, and misaligned with efficient residential construction practice. The 2025 requirements rely on detailed calculations, multiple triggers, and nuanced distinctions that are not easily applied by builders or building officials, particularly in regions with limited experience regulating lateral loads. In practice, this complexity has resulted in inconsistent interpretation and a tendency for authorities to default to requiring engineered solutions, even in low-seismic but moderate-wind load areas where traditional light-frame construction has historically performed well. Despite repeated calls from CHBA, no evidence was produced in the development of the changes that pointed to failures of current, code compliant low-rise construction.

CHBA has also highlighted that the current design procedure and the single prescriptive requirement (exempting from the design procedures) do not adequately reflect the diversity of common housing forms. The simplified path that is available applies to a very narrow range of building sizes and geometries, meaning that modest deviations such as wall offsets, window placement near corners, or standard variations in wall height can disqualify otherwise typical homes. This has the effect of pushing routine low-risk housing into the engineered design stream, increasing cost, approval time, and administrative burden without a guaranteed corresponding improvement in safety. This undermines the fundamental intent of Part 9 to provide constructible, prescriptive solutions for low-complexity buildings.

At a conceptual level, CHBA has cautioned that introducing complex lateral load provisions nationally, without sufficient simplification and implementation support, risks overwhelming jurisdictions that have little prior exposure to seismic or wind bracing requirements. Recent experience in British Columbia (2025) has shown that even in a province with established seismic design expertise, the new provisions have proven challenging to apply in low-risk areas.

Future Adapted Climatic Loads

The 2025 codes introduce future-projected climatic loads to 2070 and significantly increase wind and snow load return periods. These changes are intended to improve long-term resilience and uniform safety.

CHBA costing estimates place the added cost of future-adapted climatic loads at approximately $2,400 per home, with additional costs of $1,650 per home associated with increased wind and snow return periods in affected regions. However, the cost impacts vary significantly by location and can be substantially more in many cases.

The interaction between new data, recalibrated snow and wind load equations in Part 9, and newly introduce regional variability creates uncertainty about real-world construction and design impacts. Some regions may see substantial construction changes, while others see little change.

While CHBA supports resilient home practices and understands the need for future-projecting climatic data, insufficient assessment has been done in both policy and code development, and as a result, not enough information is available to assess whether the benefit of this change exceeds the cost. This is unacceptable in a housing affordability crisis.

Pausing adoption would allow time to reassess and properly analyze the situation and policy, assess regional impacts, train industry in new construction practices (if and where required) and ensure resilience objectives can be met without unnecessary cost escalation.

New Firefighter Objective

While this change will not appear in the 2025 codes, it has been approved in this code cycle for publication in the 2030 codes. The change will introduce a new second-level safety objective, OS6 Firefighter Safety, by separating firefighters from the definition of "persons" currently used under Objective OS1 Fire Safety. Although framed as a clarification, the change would establish a standalone objective intended to identify which existing code requirements address firefighter safety and to guide the development and assessment of acceptable and alternative solutions across the National Building Code and National Fire Code. The stated rationale is to improve clarity, consistency, and attribution of firefighter safety within the objective-based code framework, following requests contained in federal Ministers' mandate letters. This latter point shows how political interference based on single-group interest lobbying, rather than sound regulatory policy development, has driven this change and is emblematic of problems with the current system.

There is so much wrong with this government-driven change in terms of policy and code process and even code-writing that this change bears discussion in the context of what is happening with building codes and why a significant course correction is even necessary.

The following explains key issues identified by CHBA.

No Demonstrated Problem

The proposed change does not identify a real or demonstrable problem and is completely unsubstantiated by data. Existing objectives already define "persons" to include firefighters, and current code provisions already address firefighter safety where appropriate. The proposed change itself acknowledges this yet proceeds to propose a new objective without evidence of misapplication, confusion, or failure in the field. A change of this magnitude is not justified when no technical problem has been demonstrated. The real problem – in the eyes of firefighters – seems to be that there are no requirements for homes to which the new firefighter safety could be attributed (for example no 45-minute fire resistance ratings for floors between storeys), which may explain the push of the firefighters on this objective, so that future codes

could add requirements for the protection of firefighters – which would mean the presence of an objective can push the necessity of a technical change.

Willful Misunderstanding of Objective-Based Codes Concepts

The problem statement for this change is based on an incorrect understanding of how objective-based codes are used in practice. The proposed change suggests that, unless firefighter safety is explicitly called out in a separate objective, it may not be considered when developing or assessing acceptable or alternative solutions. This is not how the system works: intent statements are already an integral part of objective-based code analysis and are routinely considered by designers, regulators, and evaluators in the preparation of alternative solutions. There is no evidence that firefighter safety has been ignored or overlooked under the existing objectives, and the problem described in the rationale of the change has not been demonstrated to exist.

Conceptual Inconsistency and Risk of Setting a Precedent

The introduction of a standalone firefighter safety objective is conceptually inconsistent with how other safety objectives are structured in the codes. It separates one group of emergency responders from others without explaining why similar treatment would not be required for additional groups, such as other emergency responders or occupants. CHBA has warned that this creates a precedent for duplicating objectives rather than refining existing ones, fundamentally altering the sound logic and coherence of the objective-based code without adequate justification.

Incomplete and Inadequate Impact Analysis

The impact analysis for this objective is incomplete and insufficient. While the change claims minimal immediate impact, it does not assess the downstream consequences of creating a new high-level objective, including the likelihood that future technical requirements would be introduced in Part 9 to support firefighter safety in homes (which would cause significant changes in fire resistance of floors, for example). The analysis also fails to examine enforcement implications, jurisdictional variability, or interactions with existing provincial and territorial legislation that already addresses firefighter safety.

Research Used as a Post-Hoc Justification

The proposed change repeatedly references research that is still underway (2023) as a justification for proceeding with the change. This reverses proper code-development practice, where research should inform whether a change is necessary, not follow after a policy decision has already been made. Proceeding without completed research weakens the technical credibility of the proposal and turns evidence-based decision making into decision-based evidence making.

Politicization of the Code Development Process

The proposed change reflects a very problematic departure from evidence-based code development toward a politically driven outcome. The change originated from the previous Prime Minister's inclusion of it in several Federal Ministers' mandate letters, rather than a demonstrated technical need and was advanced by NRC staff or the level of transparent technical committee discussion normally expected when code change requests are submitted. This approach is eroding trust in the national codes by opening a technical regulatory document to political advocacy without appropriate balance through the consensus-based committee process.

Viable Alternative Ignored

As CHBA identified, the stated objectives of creating a new high-level OS6 Firefighter Safety objective could have been achieved through a far less disruptive alternative, such as adding a firefighter safety *sub*-objective under the existing OS1 Fire Safety objective. This option would have preserved conceptual consistency, avoided duplication, and minimized unintended consequences, yet it was not even explored as an avenue nor was it dismissed as not suitable. This is reflective of the conflict of interest now existing with NRC, an organization driven by ministerial mandates and having a leadership position in what is no longer an evidence-based code development process.

Focus Area 7 – (Cumulative) Costing for Codes

Although recent reforms to the impact analysis guidelines that support the national code development process now finally recognize the need to assess cumulative cost impacts of code changes – rather than evaluating requirements in isolation – on each proposed change forms, cumulative costing was not applied to the 2025 codes – not even after-the-fact, leaving governments and stakeholders without a clear understanding of the total affordability impact of that code cycle.

CHBA has done an initial assessment of the total cost of the 2025 code changes as they apply to a single-family home and argues there is a dire need to create an affordability limit for each code edition that uses the cumulative costing data to create a code affordability monitoring tool.

How Cumulative Costing Can Enable an Affordability Limit

A central weakness of the current code development system is that proposed changes are typically evaluated individually, without a binding mechanism to control the total cost added across an entire code cycle. It should also be noted that this cost assessment on individual measures is often only cursory at best, and certainly does no account for potential wide variations and extreme costs that can occur, such as with lateral loads. That aside, while revised impact analysis guidance now calls for cumulative cost estimates, there is no structured requirement to calculate these costs early, track them throughout development, or use them to guide decisions. As a result, seemingly technically justified changes can proceed independently, even when their combined effect creates significant affordability pressures. This gap was evident in the 2025 codes, where no affordability threshold existed to trigger course correction when cumulative costs escalated.

CHBA supports a recommendation developed under the Advisory Council on Harmonized Construction Codes (ACHCC) that addresses this gap by establishing a formal affordability limit for each code cycle. Under this approach, cumulative cost estimates would be prepared at key milestones, including priority setting, public review, and prior to final approval. A defined affordability limit – expressed as a total dollar impact per housing archetype and potentially adjusted by region – would set an upper boundary on acceptable cost increases. If proposed changes exceed that limit, committees and the CBHCC would be required to take corrective action, such as deferring changes, revising priorities, identifying cost-neutral alternatives, or offsetting new costs with reductions elsewhere in the code. It should be noted that for all intents and purposes, no exercise has ever been undertaken in Canada's code development process to actually reduce the costs of construction driven by the code.

Beyond protecting affordability, cumulative costing would also support better strategic decision-making, including coordinating related changes across code cycles, assessing the combined impact of tiered or anticipatory requirements, and identifying where non-regulatory tools could achieve policy objectives more cost-effectively. In this way, cumulative costing functions not only as an affordability safeguard, but as a practical tool to strengthen harmonization, adoptability, and confidence in the national codes system.

It would also drive research and innovation to find cost-effective solutions to address important code-related issues that currently have too high a price tag.

Estimating the Cumulative Cost Impact for the 2025 Codes

While estimating cumulative cost is challenging, having real world estimates is critical. While it is true that estimating cost for a single specific code change varies by the location of the home, the home type/design and by the finishing quality applied, that is no excuse for not undertaking costing estimates – in fact, it calls for quite the opposite: it calls for mush more extensive cost estimating to truly understand the cost impacts of code changes. For example, CHBA members in British Columbia are reporting engineering costs alone for the lateral loads requirements of tens of thousands more dollars than CHBA's "average" provided below. Despite the challenges, detailed individual measure costing and cumulative costing are absolutely necessary when considering the impact of code changes to housing affordability. It is also important to note that when done, Codes Canada cost estimates for proposed changes tend to be on the low side, compared to reports from industry and real-world pricing. Furthermore, there has been no assessment by Codes Canada of the full cost of all the cumulative changes in an updated code release.

Given the situation, CHBA has undertaken an initial, qualitative estimate of the cost impacts of the 2025 code. CHBA's adjustments reflect a reasonably realistic cost estimate for how a single-family home would be affected by the changes in the 2025 codes. It should be noted that CHBA's cost estimates remain generally conservative and costs in some instances may be much higher.

CHBA's cost estimates are based on the estimates from committees and NRC for individual 2025 code changes. These estimates were applied to a consistent residential archetype (single-family home) and adjusted as appropriate using publicly available construction cost data.

For each proposed code change, cost ranges published by Codes Canada were reviewed and aligned with a CHBA's single-family home archetype. In several cases, cost inputs were validated or adjusted based on direct industry feedback, including builder surveys and project-specific pricing examples, as well as with Statistics Canada updated data, to ensure that the CHBA estimates reflected on-the-ground construction practices rather than theoretical minimums.

Where Codes Canada provided cost estimates using 2021 or 2022 data, these figures were treated as a baseline rather than as current construction costs. To reflect current market conditions, CHBA adjusted these baseline cost figures to today's dollars using a cost multiplier of 39 percent, which is reflective of the cost increased experience in industry since 2022 (when many Codes Canada estimates were prepared), based on updated material and labour cost assumptions in Statistic Canada's Building Construction Product Index.

For complex or location-dependent requirements, such as lateral loads and future-adapted climatic loads, CHBA applied proportional adjustments to reflect a representative national impact rather than worst-case scenarios. Where Codes Canada estimates were based on more complex or custom designs, a reduced factor (typically 50 percent) was applied to align with the simpler CHBA residential archetype. (This is an example of where CHBA's estimate is conservative, and actual costs for many housing types may be much higher.)

Energy efficiency costs were treated separately and incrementally, with costs shown relative to Tier 1 as the base code, allowing total cost impacts to be presented for Tiers 2 through 5 without double-counting non-energy changes. The resulting estimates therefore represent applied, order-of-magnitude costs intended to capture cumulative impacts at the housing-unit level as a national average, rather than precise project-specific pricing. The compliance costs for energy efficiency were calculated separately in an

exercise for the cost impacts of the 2020 codes (when the energy tiers were originally introduced) resulting in a 50% adjustment factor.

Building Construction Products Index (BCPI)

Per above, CHBA used the Building Construction Products Index to adjust the cost to today's cost. The BCPI tracks the value of materials, labour, equipment, overhead, and profit to construct a new building. It excludes taxes, land, design, or municipal land/real property fees. It does include a "general requirements" component, so it does account for some of the soft costs of the approval process. The BCPI reflects the percentage increases for materials, labour, and overhead over time.

Costing Tables

Table 1 below shows an overview of the totals for the energy efficiency provisions and all other changes from Codes Canada.

Codes Canada Cost Estimates (Costing data: 2021)	Energy Efficiency	All Other Changes	Subtotals	**CHBA Adjusted Cost** (Costing data: 2026)
Tier 1 (Base Code)	$ -	$ 30,798.00	**$ 30,798.00**	**$ 56,364.00**
From Tier 1 to Tier 2	$ 3,800.00		**$ 34,598.00**	**$ 62,064.00**
From Tier 1 to Tier 3	$ 6,384.00		**$ 37,182.00**	**$ 65,940.00**
From Tier 1 to Tier 4	$ 13,563.00		**$ 44,361.00**	**$ 76,709.00**
From Tier 1 to Tier 5	$ 38,377.00		**$ 69,175.00**	**$ 113,930.00**

Table 2 below shows a detailed view of the totals for each if the 2025 code changes.

Code Change Subject Name		**Applied Cost**		
	Codes Canada	Factor	CHBA Cost	Commentary
Adaptability, *Visitability, Accessibility*	$994	150% +139%	$2,085	• CHBA assumed a cost of $1,500 for the adaptability requirements and applied a 39% Labour and Material Adjustment according to the BCPI • The cost estimates do not include the cost for the 2025 Visitability changes for dwelling units (as these are only required in multi-unit residential buildings providing barrier-free entrances and hallways).
Door and Windowsill Protection and Insulation	$0	+$355	$355	• CHBA assumed $105 for Materials and $250 for labour (for the 9 openings in the CHBA archetype) for the moisture protection while the insulation change is cost neutral (since it reduces the amount of insulation)
Radon - Passive stack	$1,000	150% +139%	$2,085	• CHBA assumed a cost of $1,500 and applied a 39% Labour and Material Adjustment according to the BCPI
Overheating mitigation for energy efficient homes	$0	+$6,950	$6,950	• CHBA cost is based on a builder survey including a 39% Labour and Material Adjustment according to the BCPI • CBHCC deferred the decision on mandatory AC for the 2025 code, but CHBA assumes it may become an interim change to the 2025 code. • The 2025 code performance path recognizes installing AC as an option to comply with the peak cooling criterion
Energy Efficiency for new Homes	Tier 1: $0 Tier 2: $3,800 Tier 3: $6,384 Tier 4: $13,563 Tier 5: $38,377	150%	Tier 1: $0 Tier 2: $5,700 Tier 3: $9.576 Tier 4: $20,345 Tier 5: $57,566	• CHBA had applied the adjusted Industrial Product Price Index in a previous study (last meeting of the SCEE in 2023) to estimate the increased costs of higher energy tiers • A 50% factor was applied to the original Codes Canada values
GHG Emissions	$21,750	139%	$30,232	• CHBA applied a 39% Labour and Material Adjustment according to the BCPI
Lateral Loads	$2,956	-	$10,559	• CHBA did not use the Codes Canda estimate and instead applied 50%

				of an estimate from a BC builder to account for more complexity in the estimated archetype compared to the CHBA archetype
Future climate data (to 2070)	$4,889 * 0.5 = $2,445	50%	$2,445	• CHBA applied 50% of the Codes Canada estimates because this change does not affect all locations, some of the costs will affect a few locations in the entire country
Higher design loads for wind and snow	$3,306 * 0.5 = $1,653	50%	$1,653	• CHBA applied 50% of the Codes Canada estimates because this change does not affect all locations, some of the costs will affect a few locations in the entire country
	$30,798	**$56,364**		

Per the above table, CHBA's initial analysis of a typical 2500 sq. ft. home estimates increased costs from the 2025 code changes to be $56,364, and that is 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 on such a home. On top of that, CHBA's Housing Market Index shows material costs alone for that same house (built to the existing code) have gone up $100,000 from 2025. Canada's housing crisis cannot handle these kinds of increases. A much more reasonable approach is needed in the building code, per the recommendations above.

Conclusion

As is clear from the above, Canada's newly implemented national code development system is not delivering on its promises to produce a "more inclusive, agile, responsive, transparent, and collaborative system" and where "stakeholder engagement will be enhanced to ensure that the system is responsive to the needs of code users and the public."

Instead, the National Model Codes are being overloaded with many new and very significant changes without sufficient prioritization and without focusing on evidence-based or cost-conscious code development and without truly considering industry input. These shortcomings have particularly serious consequences for Part 9 housing provisions, where increasing complexity and fragmentation undermine the prescriptive simplicity that allows homes to be built efficiently without professional design oversight. When Part 9 loses clarity and coherence, housing affordability, productivity, and supply are disproportionately affected.

As this white paper has outlined, the current system does not adhere to Treasury Board of Canada best practices for regulatory policy development, which emphasize evidence-based decision-making, transparency, and reducing administrative burden. Guided by the Cabinet Directive on Regulation, these practices are meant to ensure that regulations are justified, cost-effective, and designed in collaboration with stakeholders – a state which the current system is far from attaining. The paper makes the argument that these federal rules or an equivalent level of diligence should apply to the development of a National Construction Code. However, per the extensive list of issues in this paper, the development process for the National Construction Codes has completely lost its way compared to these guiding principles for what constitutes good regulatory development practices.

The results are unacceptable on many levels, from a policy perspective and a regulatory perspective, and are occurring at a worst possible time given the housing affordability crisis currently at hand across the country.

CHBA hopes that the portrayal of issues and the respective suggestions for solutions in this paper will help create a constructive dialogue towards a truly improved code development system that supports housing goals for Canadians.

We envision a national code system where code development, provincial adoption, and local enforcement are completely coordinated and where the responsible organizations are capable of creating harmonized codes by the time they are published, supporting industry productivity and housing affordability for Canadians. This would see a coordinated, harmonized system in which a single and unchanged national code is provincially adopted and then locally enforced in exactly the same way in every municipality. The goal should be a system where the developed regulatory solutions are implementable and affordable by the time codes are being enforced with proper training and guidance that is available before code adoption to streamline adoption.

A critical missing element in the current system is consistent local interpretation of national code requirements. Without a credible mechanism to support interpretation alongside training and enforcement, harmonization breaks down in practice, driving delay, cost, and uncertainty. A national, authoritative code interpretation function would address this gap while respecting provincial and territorial authority. Given the current code development system, Canada is a long way off from that reality. A fundamental lesson from this analysis is that codes must be ready to be implemented when they are adopted. Requirements that outpace training, enforcement capacity, interpretation clarity, or supply-chain readiness do not deliver better outcomes; they transfer risk, cost, and uncertainty onto housing delivery.

But with progressive action, that can change. This why a full pause on all things code is needed right now. We need to get the 2025 code right. And we need to fix the code development system. Both are possible, and urgently needed. Conversely, without such bold action, housing affordability and supply will continue further into crisis. The time for action is now.