



April 7, 2026

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

Subject: Follow-up on National Model Codes, Productivity, and Housing Supply – White Paper

Dear Prime Minister Carney,

The Canadian Home Builders' Association (CHBA) continues to support building code development where it is grounded in clear and sound policy analysis, where evidence-based decision-making occurs transparently, and where cost-effective, implementable solutions support both housing affordability and climate objectives. Unfortunately, [as outlined in our recent correspondence](#), the direction and outcomes of the 2025 National Building Code fall short of these principles.

We are therefore writing to follow up by formally providing CHBA's white paper, [Pause All Things Code](#), which provides more detailed evidence and analysis underpinning concerns we have already communicated to you in our previous letter, and it makes recommendations for possible solutions to many issues. The purpose of sharing this paper is to move beyond high-level messaging and provide your government with the full context for why a pause and reset are now necessary, and detailed recommendations for how to proceed.

The recommendations in the white paper reflect positions that are widely supported by construction and housing stakeholders across the country, including the industry professionals actively engaged in provincial and national codes work. Unfortunately, these critical issues continue to be downplayed within the current National Building Code establishment. As a result, industry has been left without an effective way to resolve fundamental problems through the existing process.

Productivity is a central theme throughout the white paper and is directly relevant to federal housing and economic objectives. Residential construction must become more efficient and scalable if Canada is to meaningfully increase supply. Instead, the current trajectory of the codes is moving in the opposite direction. Increasing complexity, reliance on performance expectations outside the control of builders, and the erosion of clear prescriptive pathways are slowing approvals, increasing the need for stamps from engineers, all of which reduces repeatability in housing delivery.

These impacts are particularly acute for off-site and modular construction, which CHBA and our Modular Construction Council strongly support as a key productivity solution. Modular construction depends on standardization, predictability, and consistent interpretation across the country. When





codes rely on vague performance outcomes, inconsistent local application, or requirements that can only be verified after occupancy, modular builders face higher risk, redesign costs, and barriers to scaling production. In effect, the current code direction is constraining one of the most promising tools available to deliver housing more quickly and efficiently. The leadership of our Modular Construction Council is therefore also very supportive of the measures recommended by CHBA at large.

In short, the changes intended to modernize the code system are now acting as a deterrent to innovation, productivity, and housing supply. This outcome is avoidable. The white paper sets out clear, evidence-based recommendations to restore disciplined decision-making, rebalance governance, and ensure that building codes support, rather than hinder, Canada's housing and productivity goals.

As the government seeks low-cost/no-cost ways to support more housing supply, productivity and affordability in the sector, this pause on codes can have an immediate effect, at no cost, by avoiding further challenges that will hamper supply and affordability and stifle factory-built construction.

We respectfully ask that you and your officials review the attached white paper in full. CHBA would welcome the opportunity to discuss its findings and recommendations, and to work constructively with you and your staff on a reset that delivers better outcomes for Canadians.

Sincerely,

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

cc:

The Hon. Gregor Robertson, Minister of Housing and Infrastructure
The Hon. Mélanie Joly, Minister of Innovation, Science and Economic Development
The Hon. Dominic LeBlanc, Minister of Internal Trade and One Canadian Economy
Mitch Davies, President, National Research Council of Canada
Paul Halucha, Deputy Minister, Housing, Infrastructure and Communities Canada





Appendix A

Initial Costing Estimates for the 2025 Code

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

2025 Code Changes by Subject:

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

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



Figure 1 – CHBA Archetype, Front Elevation

Figure 2 - CHBA Archetype, Elevations and Floor Plans