



ONTARIO NON-PROFIT
HOUSING ASSOCIATION

October 3, 2017

2017 New Edition Building Code Consultation
c/o Building and Development Branch
Ministry of Municipal Affairs
777 Bay Street – 16th Floor
Toronto, ON, M5G 2E5

To Whom It May Concern,

[RE: The proposed new edition of the Building Code](#)

Thank you for the opportunity to provide comments on the proposed changes to Ontario's Building Code.

The Ontario Non-Profit Housing Association (ONPHA) is a member-funded and member-directed association that represents non-profit landlords and local housing corporations throughout the province. Our more than 700 member organizations manage units in 220 communities, and they provide housing for people including seniors, low-income families with children, Aboriginal people, the working poor, victims of violence and abuse, people living with developmental disabilities, mental illness, HIV/AIDS or addictions, and the formerly homeless/hard to house.

The proposed amendments to Ontario's Building Code have been introduced with the intention of reducing greenhouse gas (GHG) emissions in the building sector in support of the government's Climate Change Action Plan. ONPHA wholeheartedly supports this policy objective. Not only will improved energy efficiency standards benefit the environment, but they will also contribute to the sustainability of the social housing sector and improve the lives of our tenants. However, while we are broadly in support of the proposed changes, we have concerns about some aspects. We also believe that there needs to be increased support to help the social housing sector meet and exceed the new energy efficiency requirements both for new development and the renovation of existing buildings. This submission presents several recommendations related to this, as follows:



1. Support and incentivize the construction of energy efficient affordable housing

As positive as the proposed new requirements and standards may be, they will come with upfront capital and ongoing operational costs that the majority of social housing providers will be unable to bear. We are concerned that, in the absence of additional support, those who are undertaking new development within this sector will be forced to defer or cancel projects, or to reduce the number of units being built. With the current insufficient supply of affordable housing stock, it would be counter-productive to create a situation that will threaten or reduce the development of social housing units within Ontario. Therefore, we recommend that the Province support this sector in their ability to undertake development that meets or exceeds energy efficiency standards by:

- a) Accounting for the costs of the new energy efficiency requirements within the funding model for new development under the current Investment in Affordable Housing (IAH), and within any future iterations of this framework; and
- b) Supporting incentives for social housing providers constructing new buildings that exceed energy efficiency requirements in the Building Code. We were pleased to see reference to the Green Ontario Fund stimulating this within the overview of the proposed changes. We would strongly support this, and encourage the introduction of specific incentives for the development of energy efficient affordable housing.

2. Continue to support and incentivize energy efficient retrofits and renovations within existing social housing buildings

Much of Ontario's social housing stock has reached, or is fast approaching, the end of its useful life and is in need of significant repairs, retrofits and renovations. This situation is challenging, but it also provides an opportunity for the Province to simultaneously support both its climate change goals and the ongoing viability of the social housing sector. Numerous social housing providers have benefited from recent provincial initiatives aimed at funding energy efficiency retrofits within existing buildings, and we were pleased to see recent provincial commitments towards continuing such initiatives. We recommend that the Province continue to use programmatic vehicles to assist housing providers meet the intent of the updated Building Code and that there be expanded investment in this area. Increased investment will have significant multiplier effects that other investments do not necessarily provide. Not only would it further Ontario's environmental objectives, but it would also contribute to ensuring that critical public infrastructure is protected and maintained for future generations of vulnerable Ontarians.



3. Support education and training initiatives related to energy efficiency within the social housing sector

Many of the proposed changes will result in increased operations and maintenance activities for which staff will require training. In addition to this, many of the proposed energy efficiency initiatives will rely on tenants adopting new, or altering existing, behaviours. For example, the proposed future move towards adaptive thermostats would rely primarily on tenant input. Achieving this would require significant tenant education and engagement, which may be particularly challenging within the social housing sector where there are often communication barriers related to language and varying levels of literacy. Therefore, we recommend that the Province encourage, support and incentivize tailored education and training initiatives related to energy efficiency for both staff and tenants within social housing buildings.

4. Include social housing representation on Technical Advisory Committees

To ensure that potential impacts and implications for the social housing sector are considered, we recommend that the Ministry of Municipal Affairs (the Ministry) include representatives from this sector on the Technical Advisory Committees (TACs) that are brought together to review Building Code changes. ONPHA would be happy to recommend representatives to be included in these discussions.

Thank you again for the opportunity to comment on the proposed new Building Code, and we would be happy to discuss any of our recommendations in further detail.

Sincerely,

Marlene Coffey
Executive Director

Cc. Janet Hope, Assistant Deputy Minister, Ontario Ministry of Housing