



Ontario
Home Builders'
Association

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Building and Development Branch
Ministry of Municipal Affairs and Housing
College Park 12th Floor, 777 Bay St, Toronto, ON M7A 2J3

Proposal Number: 22-MMAH019

RE: General Proposed Changes for the Next Edition of Ontario's Building Code (Phase 3 - Fall 2022 Consultation)

The Ontario Home Builders' Association (OHBA)

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario. OHBA represents over 4,000 members including builders, developers, professional renovators, trade contractors and many others within the residential construction sector.

Changes to Ontario's Building Code have a significant impact on the residential construction industry and ultimately the construction of new homes and housing attainability.

OHBA supports technical alignments that allow for practical building standards which both ensure Ontario can continue to build safe homes, while not negatively impacting attainability at a time when the costs of construction continue to rise. Furthermore, OHBA strongly supports the principle that Ontario specific standards, particularly those which industry are highly familiar with and support, take precedent over any proposed National Building Code (NBC) changes as the process of code harmonization is underway. This will help ensure continuity in the residential construction sector and mean more stability for builders who rely on a predictable building code system to design and construct homes.

There are a number of general code changes which OHBA can support. These include, to proposal to remove the 6-storey height limitation for sprinklered buildings with combustible wall components. This is a prudent and safe code change that will incentivize more advanced and sustainable construction technologies. Furthermore, the code change proposal to upgrade fixture outlet pipe requirements with multiple shower heads is a practical change for industry. Some municipalities are enforcing this already and would be a reasonable change overall. We are also pleased to see some of the proposed code changes embracing greater flexibility in home construction. Permitting the use of alternative membrane materials to protect basement wall insulation is a prudent move forward that will enable the use of smart vapour barriers in basements.

OHBA strongly opposes the proposed code change B-09-04-01 moving forward. The proposed changes will have a significant impact on housing design, cost and construction, ultimately creating massive cost implications that go far and above what is reasonably required to address extreme wind loads. Moving forward with this proposal will have a real impact on constructability and drastically escalate the complexity of ground oriented new home construction. OHBA can provide the Ministry with cost analysis data to underscore the implications of this



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proposal, particularly given more reasonable and effective alternative technical solutions which would be more practical for both builder and buyer.

Concerning the soil gas proposal B-09-13-01 where a rough-in would be required but would maintain the supplementary standard SB-9 in certain scenarios. This change will have an impact on housing design, cost and attainability. OHBA will provide more details at a future date concerning this change and the implications of the national code harmonization process in relation to soil gas mitigation.

We thank the Ministry for the opportunity to comment on these proposals. We also recognize that there is still more work to do and OHBA may provide further comments at a later date. We look forward to continuing engaging with the Ministry in order to ensure these proposals are aligned with the goal of increasing housing attainability.