



Shaping Tomorrow's
Built Environment Today

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April 29, 2020

The Honourable Seamus O'Regan
House of Commons
Ottawa, Ontario,
Canada K1A 0A6

Sent via Email to: nrcan.minister-ministre.rncan@canada.ca
Seamus.OREgan@parl.gc.ca

RE: Letter from Efficiency Canada concerning Canada's Model Building Codes

Dear Minister O'Regan:

ASHRAE joined with multiple organizations in signing the attached letter led by Efficiency Canada concerning the importance of Canada's Model Building Codes, and their dual positive impacts on sustainability and economic recovery. ASHRAE is a technical and professional society that typically does not involve itself with economic revitalization policy, as that is not our area of expertise. However, ASHRAE has 125 years of experience in advancing the arts and sciences of heating, ventilation, air conditioning, refrigeration and their allied fields, and develops consensus-based standards to guide industry in the delivery of goods and services to the public. We are pleased that several of ASHRAE standards are referenced in Canada's model codes, and therefore are supportive of the adoption and implementation of Canada's 2020 Model Codes.

ASHRAE would be happy to assist with further technical development, adoption, and implementation of the model codes, and welcome any questions. We are also working to develop and deploy technical resources to address the challenges of the COVID-19 pandemic as it relates to the effects of heating, ventilation and air-conditioning systems on disease transmission in healthcare facilities, the workplace, home, public, and recreational environments. We stand at the ready to assist in this critical matter as well. Please do not hesitate to contact me, or have your staff contact GovAffairs@ashrae.org for additional information or questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Darryl Boyce". The signature is fluid and cursive, with a horizontal line extending to the right.

Darryl Boyce, P. Eng., FASHRAE
ASHRAE President, SY2019-20

The Honourable Seamus O'Regan
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April 27th, 2020

RE: Building Codes as a tool for recovery

We are writing to encourage you to consider Canada's building codes as tools for economic recovery that can help stave off the impacts of a potentially deep recession when the COVID-19 health crisis ends.

Investments directed towards building code adoption and compliance can immediately bolster the capacity and effectiveness of the buildings sector workforce while physical distancing measures remain in place. Over the long-term, these investments can also lock-in the structural changes that Canada needs to meet its commitment to cut greenhouse gas emissions and reach a net-zero emissions future by 2050.

Advancing Canada's building codes can provide both immediate and quick increases in aggregate demand and deliver high-value investments in the coming decades.

Canada's 2020 Model Codes will be ready for provincial/territorial adoption in the fall of this year. Recovery investments directed towards enabling provinces/territories to rapidly adopt the 2020 Model Codes, and achieve 90% compliance levels with them by 2030, can unleash the vast potential of the buildings sector to drive innovation, lower emissions and create jobs in the clean economy.

Precedent for code adoption & compliance activities to accelerate recovery

The current financial crisis brought about by COVID-19 has drawn many comparisons to the Great Recession of 2008. Responding to the unparalleled financial shock and resulting uncertainty of that recession, the Obama administration enacted the [American Recovery and Reinvestment Act](#) (ARRA). The intent was to stabilize the economy, create or save jobs and invest in sustainable long-run growth.

The ARRA tied \$3.1 billion in stimulus funding to requirements directing states to adopt stringent energy building codes, as well as state efforts to increase building energy code compliance, from [50% in most jurisdictions](#) at the time, to 90% by 2017.

Today, we find ourselves in a similar situation.

The COVID-19 induced shutdown has also led to significant [economic contraction](#), destabilized the economy, and left millions under-employed. To help put Canadians back to work, measures to encourage provincial/territorial building code adoption and compliance can be used to immediately scale up capacity and knowledge sharing in the buildings sector, [activate local employment](#) and accelerate long-term market transformation.

In the coming months, significant increases to existing supports and programming can facilitate provincial/territorial code adoption and implementation activities. Similar to the ARRA, significant financial incentives conditional on the adoption of the 2020 model codes will signal to investors and consumers that this economic recovery is Canada's transition to a clean economy, encourage

investments in high-performance buildings and products, and lock-in energy efficient structural change for decades to come.

More immediately, online training and capacity building efforts can reduce barriers to adoption and greatly increase compliance over the long-term, while providing direct relief for building officials, trades, and supporting services in finance, insurance and real estate idled by physical distancing.

Accelerate energy efficiency through existing buildings and equipment and appliances

Existing buildings represent two-thirds of the energy waste and emissions that the sector needs to eliminate by 2050. As such, it is critical to ensure efforts to support the development of the Building Code for [Alterations for Existing Buildings](#) continues. Additional targeted stimulus investments aimed at widespread deep retrofits should also be considered as these investments have the potential to create over [200,000 local jobs](#) over 10 years for a variety of professions and skilled trades.

Equally important is Natural Resources Canada's [Market Transformation Roadmap for Energy Efficient Equipment in the Building Sector](#). The Roadmap is critical to promoting the R&D, demonstration, and training activities. Renewed support for the roadmap is required to create demand for the manufacture and installation of technologies like heat pumps in high-performance buildings and position Canadian manufacturers as world leaders in energy efficiency.


Long-term [sustainable investments](#) in training and capacity that provide support for the retrofit of existing buildings and to carry out those activities identified in the Roadmap are key to preparing their implementation while avoiding past boom-bust cycles.

Capture immediate and long-run benefits through advanced building energy codes

Stringent building energy codes for new and existing buildings, high levels of compliance and energy efficient building equipment and appliances will help to drastically reduce Canada's energy demand and associated emissions. As part of the economic recovery, these measures can also provide immediate benefits and, in the future, ensure our buildings are more comfortable, resilient, durable and better able to provide security against future disruptions caused by weather, electricity outages and more.

Support for the Model Codes are amongst a number of [measures](#) that can contribute to Canada's COVID-19 economic recovery. We would be pleased to discuss further how building code adoption and compliance can generate employment in the clean-energy economy, stimulate innovative clean technologies and help the buildings sector lead Canada's transition to a low-carbon future.

Sincerely,



Kevin Lockhart
Efficient Buildings Lead, Efficiency Canada



Gabriella Kalapos
Executive Director, Clean Air Partnership



Joshua MacNab
National Policy Director, Pembina Institute



A handwritten signature in black ink that reads "Cindy Gareau".

Cindy Gareau
Executive Director, Canadian Association of
Consulting Energy Advisors (CACEA)



Ben Grieder
Efficiency Projects Coordinator, Ecology Action
Centre



A handwritten signature in black ink that reads "Tonja Leach".

Tonja Leach
Executive Director. QUEST



Bryan Purcell
Vice-President - Policy and Programs,
The Atmospheric Fund



Brent R. Kopperson
Founder & Executive Director, Windfall Ecology
Centre



George P.R. Benson
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Economic Commission



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