

August 29, 2025

Housing, Infrastructure, and Communities Canada
bchengagement-mobilisationmc@infcc.gc.ca

Re: Build Canada Homes Market Sounding Guide

To Whom it May Concern:

The Canadian Association of Consulting Energy Advisors (CACEA) would like to provide our feedback for the Build Canada Homes (BCH) Market Sounding Guide. CACEA is a not-for-profit organization representing Energy Advisors (EAs) registered by Natural Resources Canada across the country. Our members' area of expertise is in new and existing Part 9 residential and low-rise buildings, and as such the feedback provided below is specific to these archetypes.

CACEA is a strong supporter of the Government of Canada's initiative to bring more affordable housing to Canadians across the country. We believe that by utilizing the existing expertise and workforce, including Energy Advisors, we can build further capacity in the Part 9 new construction industry while ensuring healthy, safe, durable and affordable new housing for all.

Recommendations

We have reviewed the BCH Market Sounding Guide and would like to provide the following feedback for your consideration.

1. Collaboration, outreach and partnership development needs to include all levels of the new housing construction workforce

Section 6 of the Market Sounding Guide (Partnerships and engagement) notes the importance of engagement from a number of stakeholders, including government, developers, manufacturers, financial institutions and indigenous partners. While we agree that these are all important members of the new construction community which need to be at the table, a number of key players have been left out. Namely, those 'boots-on-the-ground' members of the building community, including trades, home builders, energy advisors, home inspectors, building envelope engineers and building officials. In addition, industry stakeholder representatives, such as the Canadian Home Builder's Association, CACEA, Alliance of Canadian Building Officials Associations, Aboriginal Housing Management Association and utility providers. Each one of these groups can bring valuable hands-on experience to the conversation about the practical ways in which the goals of this initiative can be fulfilled in a timely, cost-effective, collaborative and efficient manner.

2. The principles of building science, durability and operational energy costs need to be at the forefront of the discussion

The two main objectives stated in the Market Sounding Guide include *build affordable housing at scale* and *build faster, better and smarter*. Speaking towards the latter objective, we believe further elaboration and directive should be given to ensure those homes which are built faster, better and smarter are also built through the lens of *durability* and *occupant health and safety*. Numerous examples may be found from across the country when the principles of building science were not considered prior to the implementation of new or innovative construction practices (consider the ‘leaky condo crisis’ in Vancouver, circa 1980-2000). CACEA strongly encourages the principles of building science be at the foundation of any design or construction practices guide prior to distribution, with consideration noted for regional and climate zone variations. By implementing building science best practices into the development and design of BCH’s work, we can ensure the health, safety and comfort of Canadians is put at the forefront of the discussion, as well as the durability and longevity of new homes moving forward.

In addition to occupant health and safety, comfort and building durability, we believe further consideration must be given to the *operational* costs of new housing for Canadians. While the Market Sounding Guide outlines the opportunities to reduce the cost of new construction (Section 5.3), no discussion is given to the long-term operational costs of new housing. Should financial consideration not be given to the costs for individual homeowners in the country, we believe the long-term objective of building affordable housing are not truly met; in other words, affordable housing should not only encompass the initial investment required to build and own a home, but that which is needed to operate and live in the home sustainably, as well.

We appreciate you taking the time to consider our feedback on the Market Transformation Guide and applaud you for the efforts taken thus far. We at CACEA strongly believe that affordable, safe, healthy, comfortable, durable, and energy efficient housing should be a priority for all Canadians, and that it is possible to deliver homes that encompasses each of these principles without compromise. Should you wish to discuss the comments and feedback included above further, please do not hesitate to reach out.

Sincerely,



Alison Conroy
Technical Liaison Director
Canadian Association of Consulting Energy Advisors