

October 3, 2025

To: [homelabelling-etiquetageresidentiel@nrcan-rncan.gc.ca](mailto:homelabelling-etiquetageresidentiel@nrcan-rncan.gc.ca)

**Re: Feedback on NRCan's Guidelines for Virtual Energy Assessments & Virtual Home Labelling**

The Canadian Association of Consulting Energy Advisors (CACEA) is pleased to provide feedback on NRCan's *Guidelines for Virtual Energy Assessments & Virtual Home Labelling*.

We appreciate the government's leadership in developing a framework that aims to bring greater alignment to the evolving virtual assessments ecosystem. Clear guidance is important to ensure consistent outcomes for homeowners, reduce misinformation, and build confidence among organizations using these tools.

Below, we provide comments and recommendations on both the use of virtual tools and the Guidelines document (not listed in order of priority).

**1. Scope of Use of Virtual Results**

CACEA supports virtual tools only as an introductory awareness tool to help homeowners better understand their home's energy use and efficiency. They must not be used in isolation or as a replacement for in-person audits by registered Energy Advisors (EAs). Incorrect homeowner inputs (whether intentional or not), as well as limitations around air tightness, geometry, and unique building conditions, mean these tools cannot provide definitive results. Stronger language is needed in the Guidelines to emphasize these limitations and direct homeowners and virtual tool clients such as provinces, territories and municipalities towards a full EnerGuide assessment as the next step.

**2. Reference and Wording Specific to Energy Advisors**

The critical role of EAd is undervalued. Messaging within virtual assessments should direct homeowners to engage an EA for next steps as they bring a perspective that virtual labels cannot provide. NRCan has invested significantly to build a skilled EA workforce, and the Guidelines should reinforce this commitment. Without clear distinction, virtual reports risk being perceived as definitive, undermining the value of on-site assessments and may be seen as a replacement for EA services subsequently impeding the efforts of many to expand a workforce that is necessary to address climate change and resilience efforts across the country.

**3. Terminology**

As this is a potential seed document for a future standard it is important to have definitive directions – in particular, the word “*should*” must be changed to “*shall*”.

In addition, we do not support the use of the terms “*label*” and “*assessment*” in connection with the virtual tools. Established and respected programs such as NRCan's *EnerGuide* program provide official labels under robust requirements. In addition, the term

*assessment* infers a thorough in-person investigation of a home has taken place by a qualified individual. Using these terms risks confusing homeowners, undermining trust, and leading to misinformed decisions. Alternative terms such as *benchmark* or *score* would be more appropriate in place of *label*, and *overview* or *snapshot* in place of *assessment*.

#### 4. Upgrade Recommendations

It is concerning that Guidelines around the inclusion of upgrade recommendations are not addressed. Many of the existing virtual tool platforms include upgrade pathways, costing, and roadmaps, which may be misinterpreted as prescriptive or definitive. Homeowners should be cautioned that true upgrade roadmaps require in-person EA audits. Virtual tool recommendations should be presented as general information, and wording should be explicit that the information provided is an assumption and in no way a certainty or fact. In addition, if used, costing should be presented as ranges for the purpose of benchmarking and budgeting with clear disclaimers that prices will vary. Guidance should direct homeowners to contact an EA prior to undertaking any work on their home, explaining how the benefits of the on-site audit extend beyond energy efficiency and include a focus on occupant health, safety, comfort, and durability.

#### 5. Use of Virtual Labels and Conflict of Interest

Virtual results must not be used for incentive or rebate programs. The Guidelines should make this explicit, noting that these initiatives must be supported by registered EAs and the EnerGuide system. In addition, the Guidelines should state that the use of the label should not be used in such a way that they create a conflict-of-interest with a third-party directing homeowners to use the tool in order to benefit their business. It must be stated in the Guidelines that a conflict-of-interest should be declared if a company stands to financially benefit from a homeowner's use of the virtual tool.

#### 6. Voluntary Nature of the Guidelines

We are disappointed the Guidelines are voluntary. We recommend government fast-track the development of a standard and compliance framework to better protect Canadians and the industry.

#### 7. Guideline Audience

The Guidelines are useful not only for virtual tool providers but also for end-users. This should be explicitly stated.

#### 8. Applicable Sector

The Guidelines apply primarily to the existing homes market. This is not clear in the current draft and may create confusion.

#### 9. Data Use and Privacy

Vendors and the provinces, territories and municipalities that leverage these platforms must be required to clearly disclose to the homeowners how data is collected, stored,

used, and disposed of. Disclosure of this must be a requirement. In addition, the Guidelines should provide direction for virtual tool clients on verifying the reliability of data used in algorithms and ensuring compliance with applicable standards.

#### 10. Editorial Recommendations:

We have also identified several editorial and consistency issues for consideration:

- **Expand Objectives of the Guidelines** (page 4): with an additional goal: *Encourage the implementation of effective, informative labeling to improve the energy efficiency, health and durability of homes across Canada*
- **Types of assessments considered in the Guidelines** (page 5): Add the following at the end of paragraph 1: “...but may be encouraged as a result of the labelling program”.
- **Alignment with the EnerGuide Rating System** (page 6): Add at the end of Paragraph 2, end of last sentence “...and further describe the benefits of conducting a full EnerGuide energy assessment.”
- **1.2.2 Prerequisites for virtual energy assessments and virtual home labels** (page 10):
  - A potential edit to the second bullet: “the assessment is completed prior to any renovations are made to the house including renovations to the building envelope (foundations...)”
  - At the end of the content there is a “(See note)” but no reference to the direct the reader.
- **3 Terms and definitions:** (page 13):
  - On-site energy assessment – add reference to the blower door air tightness test.
  - Define Net Zero as there could be confusion regarding the Canadian Home Builders’ Association (CHBA) Net Zero/Net Zero Ready label.
- **4.4 Modelling inputs** (page 16): Add ventilation system type to the list.
- **4.4.9 Primary heating system type** (page 18): Second paragraph should read “Clarification should be provided by the homeowner if the heat pump has a designated back-up heating system. If this information cannot be provided, a default backup heating system should be assumed.”
- **6.1. Definition and scope** (page 29): Add a third bullet under the first bullet list: “Information provided for EnerGuide energy assessment evaluations should direct homeowners to the NRCan website (and provide the link)”
- **7.1. Reference comparisons** (page 32): Potential additional content “Where comparisons are given, the age of the home they are using for the comparison should be provided.”
- **7.3 Terms of on-site assessment** (page 32):

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- Add bold text in first sentence, first ... “verified **by an energy** advisor using an on-site....”
- Add to the bullet list:
  - Properly ventilated
  - Durable
  - Resilient
  - Healthy indoor environment
  - Safe
- **7.4 Terms reserved for use in other types of energy assessments** (page 33):  
Change “qualified professional” to “*registered Energy Advisor*” in both rows.
- **Appendix A-1.2.3** (page 34): Second paragraph; 5 lines down at the end of the sentence “...homeowners to correct errors or omissions in these records.” add the following “...and that the assumptions being made are clearly defined.”
- **General comments:**
  - Use “and” instead of “&” throughout.
  - Write out acronyms at first use (e.g., Virtual Home Labelling, greenhouse gas).
  - Ensure the presentation of virtual home assessment is consistent in the document, e.g., Virtual Home Assessment (see page 31).

Virtual platforms have an important role in engaging homeowners and raising awareness about energy efficiency. However, they must be positioned clearly as a first step only. The Guidelines should strongly reinforce the value of in-person assessments, the EnerGuide label, and the critical role of EAs in ensuring accurate, science-based, and actionable advice for Canadians.

We would welcome the opportunity to discuss our comments and official positions further as well as continue our engagement with your work on the simplified energy assessment and potential research projects.

Sincerely

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