

August 13, 2026

The Building Code Short-Term Advisory Body

Re: Response to Ontario's Building Code Short-Term Advisory Body Consultation Paper]

Dear Advisory Board,

On behalf of the Canadian Association of Consulting Energy Advisors (CACEA), I am pleased to submit our response and recommendations to updates to the Ontario Building Code (OBC).

Who We are

CACEA is the national voice for Energy Advisors (EAs) across Canada. Our members assess and improve the energy efficiency, sustainability, resilience, and comfort of new and existing homes, and support delivery of home labelling and energy programs such as EnerGuide, R-2000, ENERGY STAR® for New Homes (ESNH), CHBA Net Zero/Net Zero Ready, and Built Green Canada. EA are registered with Environment and Climate Change Canada (ECCC) (formerly under Natural Resources Canada) to assess and model home energy performance, helping homeowners, builders, renovators, and policymakers make informed, sustainable building decisions.

CACEA elevates the profession through training, credentialing, and advocacy, and serves as a trusted resource and connector for our members and for the broader community of homeowners, builders, developers, trades, municipalities, and real estate professionals working toward more energy-efficient homes across Canada.

Our members work with the OBC daily through energy modelling, compliance verification, and program delivery. We are well positioned to offer practical, on-the-ground input on how the Code's energy provisions actually work — and where they could work better.

Why Our Voice Matters in This Consultation

EAs occupy a distinctive position in Ontario's construction sector: independent, technically qualified professionals who verify energy performance, rather than sell a particular product, material, or construction method. Our members apply the Code's energy provisions on the ground, on real projects, throughout the province, on an ongoing basis. That provides CACEA with a practical, evidence-based, and impartial vantage point on the questions this consultation raises — usability, administration, and national alignment — grounded in direct working experience rather than general policy interest.

Our members also work directly with both builders and homeowners throughout a project. This provides us with visibility into how Code decisions actually impact the people who will live in these homes for decades — a perspective that may not otherwise reach the Advisory Body through this process, and one we believe is directly relevant to the public-interest framework the Advisory Body has set out for this review.

We have aimed to keep this submission consistent with the guiding principles the Advisory Body has set out for this review: evidence-based and practical, grounded in real-world experience, mindful of the OBC as a system rather than a list of individual provisions, and focused on genuine 'burden reduction' rather than shifting costs or risks elsewhere. This is intended to make our input easier to weigh alongside the Advisory Body's own approach to this work.

Our Position In Brief

The OBC recently adopted the National Building Code (NBC) as its base, with a set of Ontario-specific amendments layered on top. This was a significant step that removed many long-standing differences between the provincial and national codes. As with any harmonization effort of this scale, some jurisdiction-specific exceptions remain in place, which the underlying interprovincial agreement itself anticipates and permits. Housing energy requirements are an example where Ontario relies on its own standard, known as SB-12, rather than the NBC approach. SB-12 has been adjusted over time to roughly match one of the NBC's five “tiers” of energy performance (specifically, Tier 3). We see this as a natural next step for alignment, and one this review is well positioned to help advance.

In practical terms, SB-12's separation from the NBC framework shows up as duplicate paperwork, inconsistent decisions from one municipality to the next, and no clear plan for what comes next — for builders, for EAs, and ultimately for homeowners who bear the cost through higher energy bills and fewer electrification-friendly options and homes less able to maintain safe, comfortable conditions during extreme weather.

CACEA's core recommendation is straightforward: Ontario should align its housing energy requirements with the NBC's tiered framework, starting at a level consistent with today's standard, that includes a clear, published plan and roadmap for what comes next. This is not a call to lower the bar. It is a call for a clearer, more consistent bar that everyone — homeowners, builders, and municipalities — can plan around and supporting the province's goal of building homes more affordably and quickly.

Summary of Recommendations

- Align Ontario's housing energy requirements with the NBC's tiered framework, rather than maintaining a separate provincial standard.
- Publish a clear, multi-year plan for moving through the energy performance tiers. As an example, the Atlantic provinces have already done this, adopting one tier at a time on a published schedule, so that industry has a roadmap to follow instead of surprises.
- Recognize that Ontario's builders and EAs, through years of experience with voluntary programs, are already well prepared for this shift. Harmonizing now builds on real readiness, not a leap into the unknown.
- Preserve the role of registered EAs as independent, qualified verifiers of energy performance, however compliance pathways evolve.
- Pair any move to higher tiers with real investment in training – not only for trades, but also for building officials (BO) and Authorities Having Jurisdiction (AHJs) who verify compliance – so the whole system, not only construction crews, can deliver what the higher tiers require.
- Encourage broader, voluntary adoption of airtightness (blower-door) testing now, well ahead of any tier that requires it. This enables builders, trades, and EAs time to build capacity and actual capability before it becomes mandatory.
- Address the inconsistent way different municipalities interpret and apply energy requirements today. Currently, the same project can be reviewed differently depending on where it is built.
- Begin planning now for how Ontario will eventually address operational carbon and start watching embodied carbon requirements which are expected in NBC 2030, so that neither becomes a separate scramble later for the industry to understand and apply.

Why This Matters

1. A single national code means clearer, faster answers.

When every province uses the same code, technical questions generally only need to be worked through once. The interpretation, guidance, and precedent can be reused everywhere, rather than each province and territory, or each municipality, starting from scratch. This reduces duplicated effort throughout the system – BOs are not developing separate rulings on the same issue, builders and EAs are not relearning different rules every time they cross a provincial/territorial line, and manufacturers can design to one national standard instead of several. Because Ontario's requirements do not fully match the NBC, much of this shared effort is not currently available.

Digital tools can add further value here, although they depend on that same alignment to work well. Tools built on the NBC, such as NRCan's Code Compliance Navigator, are designed to help builders, EA, AHJs, and BOs work through compliance more efficiently, but only where the underlying code is shared. As Ontario moves closer to the national code, tools like this could meaningfully speed up approvals and improve consistency, on top of the benefits of shared interpretation itself.

2. An opportunity to modernize a well-established standard.

SB-12 has served Ontario well, but it has not had a major update in roughly twelve years, and construction practices have evolved considerably since it was written. One concrete example: the current pathway makes it harder and more costly to build a home with a heat pump and electric backup. An update would help remove this barrier to electrification which is a national and provincial priority.

3. A shared code would help interpretation keep pace with practice.

Builders and EAs sometimes encounter different answers to the same question depending on the municipality, or the individual reviewer. This adds cost and delay without a clear safety justification and reflects how difficult it can be for different reviewers to apply a complex, evolving standard the same way every time. A shared national code, with shared guidance and interpretation, would help reduce this kind of inconsistency, particularly when paired with dedicated training and resources that support the building sector, including BOs and AHJs, in applying the Code consistently (see point 6 and Q5 in the appendix).

4. Ontario is well-positioned for a performance-based path, not just a prescriptive one.

Across Canada, some jurisdictions hesitate to rely on performance-based compliance (where a builder demonstrates a target is met, rather than following a prescriptive, fixed checklist), often because the prescriptive path is seen as simpler and less costly, or because they lack enough qualified professionals to support the performance path properly. Ontario does not face that second constraint: EAs, including CACEA's members, are ready to help builders use whichever compliance path works best for their project. This is a genuine Ontario advantage worth preserving in any harmonization.

This readiness only pays off if the underlying methodologies are applied correctly. It is important to note there is more than one way to demonstrate performance-path compliance, and they are not interchangeable. Modelling done using the NBC's methodology and modelling done using EnerGuide's methodology are two distinct routes to achieve the same tier. They are not different ways of describing the same underlying methodology. Any guidance the province issues should keep this distinction clear.

5. One practical detail worth flagging: ENERGY STAR® For New Homes.

The OBC currently recognizes ESNH as one way to demonstrate Code compliance, and a meaningful number of builders rely on this pathway today. However, the NBC does not name this program specifically. If Ontario harmonizes without addressing this directly, ESNH could unintentionally lose

its standing as a compliance option. CACEA is not taking a position on whether that program should be preserved. We are only flagging that this is an active and ongoing consequence worth the Advisory Body's attention, and not a hypothetical one.

6. An important practical consideration for the higher tiers: airtightness testing.

The importance of airtightness testing as a practical consideration warrants early attention, as it directly affects how achievable the higher building code tiers will be in practice. The NBC's Tier 4 and Tier 5 compliance packages require blower-door (airtightness) testing to confirm that a home has been constructed as it was designed. This form of testing is not yet common practice under Ontario's current standard, meaning that reaching Tier 4 or 5 in the future will likely require airtightness testing to become a standard, widespread part of how homes are verified for OBC compliance. The necessary testing infrastructure and practice would need to develop alongside those higher tiers.

Expanding the use of airtightness testing now, well in advance of any formal requirement, would give builders, trades, EAs, and the BO and AHJs who review this work an opportunity to develop genuine capability with it over time, rather than confronting a steep, disruptive learning curve once a higher tier becomes mandatory. Early, voluntary experience gained today would translate directly into a smoother, more confident transition when the higher tiers eventually apply.

This is not merely an administrative step. Testing confirms that a home performs as intended, improves the accuracy of related calculations builders already depend on, and provides homeowners with genuine assurance — beyond a document alone — that their home meets its intended performance. This benefits climate goals and resilience, as well as individual homeowners. A well-sealed, verified building envelope helps a home maintain safer, more stable indoor conditions during extreme heat, cold, or power outages, in addition to delivering the energy savings the Code intended, rather than a compliance record that may not reflect actual performance.

CACEA recommends that the Advisory Body treat broader adoption of airtightness testing as a necessary, practical component of any credible plan to reach the higher tiers, rather than an optional measure to be addressed later.

7. Additional oversight should improve consistency, not add new paperwork.

Simplification comes from applying existing rules the same way everywhere, not from adding new layers of oversight to verify that they are being followed. New tracking systems or submission requirements would add cost and time to an already lengthy permitting process — working directly against the province's goal of building homes more affordably and more quickly. CACEA's priority is consistency achieved through shared guidance, existing tools such as NRCan's Code Compliance Navigator, and better-supported builders, BOs and AHJs (see Q5 in the appendix), not through new bureaucracy layered on top of what already exists.

8. Supporting innovation by reducing inconsistency, not changing the Code's substance.

The barriers to innovation described below reflect the same underlying dynamic as noted in point 1, applied here to innovation rather than administrative interpretation – a shared code allows knowledge to be reused rather than rebuilt.

A harmonized code allows innovative solutions and approaches to be shared and leveraged across jurisdictions. Once something is developed and approved in one jurisdiction, it can be applied elsewhere without being reinvented or re-approved from scratch. A separate, Ontario-specific code does not facilitate this at an interprovincial level. In addition, inconsistent interpretation within Ontario can create the same effect at the municipal level where an approach accepted in one municipality is not necessarily recognized in another, even where the underlying Code requirement is identical. Both forms of inconsistency create real barriers to innovation.

As an example, manufacturers building modular or off-site housing for shipment across provinces and territories currently must work with three or more different codes, interpreted, at minimum,

three different way. This is a meaningful barrier to scaling that industry, and one that affects the province's own goal of accelerating homebuilding leveraging modular and off-site construction as a widely recognized strategy to increase Ontario's housing supply. Similarly, promising approaches such as thermal energy storage are currently assessed on a case-by-case basis in Ontario, with no consistent way to apply a successful approach from one project, or one jurisdiction, to the next. A shared national code, paired with consistent interpretation within Ontario, would help address these barriers.

On Operational and Embodied Carbon

The recently released NBC 2025 introduces requirements to limit operational carbon emissions for the first time, through a scale of performance levels rather than a single pass/fail requirement. CACEA recommends Ontario adopt this cautiously, starting at Level F, which is the most conservative level available. This is a new area to incorporate in building compliance, and much as the energy tiers themselves matured significantly between 2020 and 2025, we expect the same maturing process to occur with this application.

At the same time, the NBC is already anticipating embodied carbon requirements (the emissions associated with building materials and construction, as distinct from a home's day-to-day energy use), expected around 2030. These are different technical domains. Ontario's experience phasing in operational carbon now — building administrative and regulatory processes needed to introduce a new requirement gradually — will remain valuable when embodied carbon requirements arrive. CACEA recommends the province begin monitoring embodied carbon developments now, so both are addressed in a planned, sequenced manner, rather than through two separate, uncoordinated efforts undertaken later under a greater time pressure

CACEA recognizes this may seem, at first glance, to sit outside a review focused on reducing complexity and administrative burden. Addressing carbon now, while the Code is open for review, is the lower-complexity path, not the higher one. Ontario's experience with SB-12 illustrates what happens when a requirement is left to diverge from the NBC for an extended period: it becomes a separate, standalone system that is harder to administer, harder to interpret consistently, and harder to eventually reconcile. Waiting to address carbon risks creating a second version of that same problem. Building the administrative capacity for a new requirement once, in a planned and gradual way alongside the current energy-tier work, is simpler than building it twice later and under greater pressures. It also gives builders, EAs, and BOs the same predictability benefit that a published, multi-year tier pathway provides for energy performance; that being a known, gradual path that is inherently less disruptive, and therefore less burdensome, than an abrupt future requirement.

Beyond the administrative case, planning for operational and embodied carbon now delivers similar climate, resilience, and safety benefits described in point 6. For homeowners specifically, this means homes that use less energy, produce fewer emissions over their lifetime, and are better able to keep occupants safe and comfortable during extreme heat, cold, or power outages. For industry, it means a stable, predictable framework that builders and EAs can design and build from the outset, rather than adapting to sudden change after the fact.

A Broader Perspective on Affordability

Finally, CACEA wants to offer a realistic, helpful perspective on housing affordability more broadly. The recommendations in this submission — harmonizing energy requirements, publishing a clear multi-year pathway, reducing interpretive inconsistency, and removing barriers to innovation — are meaningful contributions to the province's goal of building homes more affordably and more quickly. At the same time, much of the cost and delay in building new homes originates from municipal approvals, permitting timelines, development charges, and other processes that sit outside any building code scope, provincial or national. This is true of the NBC as much as the OBC: building codes set technical and safety standards for construction, they do not regulate land use planning,

municipal approvals, or development financing, which are the primary levers behind many of these costs and delays.

As the consultation paper itself notes, this places most of these issues largely outside this review's scope. We support this review and see it as a genuinely important contribution, and we encourage the Advisory Body's reporting to position OBC reform as one important piece of a much larger picture — helping set realistic expectations for what this review, on its own, can achieve.

Conclusion

CACEA appreciates the opportunity to contribute to this important review. We support the Advisory Body's goal of reducing unnecessary burden while safeguarding the health, safety, accessibility, and performance outcomes that the OBC is designed to ensure. We look forward to reviewing the Interim Report expected in September 2026 and would welcome the opportunity to provide further comment before the Final Report is issued in March 2027. CACEA would also welcome the opportunity to participate in any targeted discussions, technical sessions, or roundtables the Advisory Body convenes as this work progresses, and our members remain available to provide further input, examples, or technical expertise at any stage.

Sincerely,



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Appendix

Responses Mapped to the Consultation Paper's Eight Questions

This appendix maps our comments to the Advisory Body's specific consultation questions, with references to the relevant OBC provisions where applicable, as requested in the consultation paper.

Usability, Complexity, and Modernization

Q1. Where do requirements create unnecessary complexity without improving outcomes?

Housing energy compliance under Supplementary Standard SB-12 (Division B, Part 9) often requires documentation that duplicates what is already produced for EnerGuide and other labelling programs, adding cost without improving the outcome being verified. This is a recurring issue affecting most residential projects using energy modelling for compliance.

CACEA recognizes that EnerGuide and other labelling programs are voluntary and fall outside the OBC's, and this review's, formal scope. CACEA is not asking the Code to regulate or formally recognize these programs. CACEA's position is narrower: the Code's documentation requirements should not needlessly duplicate information already produced for a separate purpose, and EnerGuide's methodology is a useful practical reference point for reducing that duplication. We note that EnerGuide is already working, on its own initiative, to align its procedures with the direction of the NBC. This is an informal effort led by EnerGuide, not a Code requirement, and CACEA is not recommending that the OBC formalize a relationship with EnerGuide or any other labelling program.

By contrast, not all additional complexity is unjustified. Members have also identified airtightness (blower-door) testing as a useful comparison point: expanding its use adds an additional verification step and increases confidence in compliance results while improving outcomes for homeowners and climate goals as was discussed further in point 6 of this submission.

This is the test CACEA applies throughout this submission: added complexity is a concern only when it fails to deliver a corresponding benefit, be it safety, performance, or homeowner comfort, and not complexity in itself.

Q2. Where could requirements be simplified, clarified, or applied more flexibly?

SB-12's prescriptive, trade-off, and performance compliance paths would benefit from clearer, more consistent guidance on what each path requires, so builders can choose the most practical option with confidence. Expanding accessible use of the performance path in particular would let builders meet targets flexibly rather than following a fixed checklist. This directly supports the review's objective of simplifying and clarifying requirements without compromising outcomes: the performance path does not change what a home must achieve, only how compliance is demonstrated, and independent verification by EAs (see Q8) ensures enforceability is maintained regardless of which path is used.

Q3. Are there outdated, overly prescriptive, or duplicative provisions?

SB-12 has served Ontario well, but it has not had a major update in roughly twelve years and predates many of today's building methods, technologies, and equipment. One specific, recurring example: current SB-12 compliance packages make it more difficult and costly to build a home using a heat pump with electric backup, an increasingly common choice for a growing share of new builds. This creates an avoidable barrier to electrification, a stated priority at both the national and provincial levels.

Implementation, Administration, and Consistency

Q4. Which administrative issues most affect timelines, consistency, or cost?

The inconsistent interpretation of SB-12 requirements between municipalities is a recurring, province-wide issue affecting builders and EAs working across multiple jurisdictions. It results in added delays and costs without a corresponding safety benefits and stems, in part, from reviewers working from Ontario-specific provisions rather than a single, shared reference point.

Emerging tools such as NRCan's Code Compliance Navigator, which are built on the NBC, could help address this because as such tools are designed to apply the same Code logic to every submission, they have the potential to produce a consistent compliance determination regardless of the municipality or reviewer involved. This reduces the reviewer-to-reviewer variation described above. However, this depends on Ontario's energy requirements being aligned with the national framework and the tool reaching a mature, widely available stage. This benefit extends beyond any single tool: as digital compliance tools continue to be developed across Canada, they are being built around the NBC, since that is what most jurisdictions reference. Harmonization would allow Ontario access to this broader, growing ecosystem of tools as they emerge, rather than limiting the province to solutions built specifically around SB-12's separate framework.

This comment is intended as a review to support building officials and AHJs in applying requirements consistently, not a new tracking or recordkeeping system for builders: CACEA considered whether a separate centralized system for tracking Code-based compliance data would help, but on balance, recommends against this, since the priority should be consistency in how existing requirements are applied, not new tracking systems or additional submission requirements (see point 7).

Q5. Where do interpretation or enforcement challenges create inconsistency, and how could this be remedied?

Reviewers apply different standards when assessing performance-path submissions versus prescriptive submissions, even within the same municipality, because performance-path review requires more specialized judgment. These inconsistencies also vary by sector: production builders working from a standard set of designs across multiple projects are particularly affected, since a single interpretive difference can multiply across many homes, while custom home builders and renovators more often encounter inconsistency in how alternative solutions provisions are interpreted.

CACEA recommends addressing this through several complementary mechanisms:

- provincial interpretation bulletins on recurring questions, so a single ruling applies consistently across municipalities;
- standardized training and reference materials for BOs and AHJs, developed with input from EAs;
- a centralized, searchable repository of accepted compliance approaches and past interpretations; and
- a lightweight, timely dispute-resolution pathway to resolve disagreements before they cause project delay.

Ontario-Specific Requirements and National Alignment

Q6. Where does alignment, or lack of alignment, with national codes create unnecessary burden?

SB-12's separation from the NBC's Section 9.36 framework is the clearest example of misalignment. It affects homeowners and industry, through higher lifetime energy costs and barriers to electrification such as the current SB-12 pathway making it more difficult and costly to build a home with a heat pump and electric backup (see Q3), not only industry. At the same time, some Ontario-

specific provisions remain justified and should not be discarded without a clear transition plan: the OBC's current recognition of ESNH as a compliance pathway is one example, discussed further in point 5. We recommend the Advisory Body weigh homeowner outcomes explicitly as it considers the benefits of closer alignment going forward.

Innovation and More Efficient Building Practices

Q7. What barriers exist to innovation, alternative solutions, or more efficient practices?

A harmonized code would ensure a solution that has already been reviewed and approved in one province or territory is recognized more readily than others, rather than requiring a full and separate re-approval process in each jurisdiction (see point 8). As an example, manufacturers of modular and off-site housing shipping product to multiple provinces currently face separate, inconsistently interpreted codes in each jurisdiction, a significant barrier to that sector's growth. Similarly, approaches such as thermal energy storage are handled case-by-case with no consistent Code guidance, so a successful approach approved in one province cannot be applied or relied upon in Ontario.

More broadly, SB-12's position outside the national tiered framework (see "Our Position, in Brief") limits the regulatory signal that would otherwise encourage builders and manufacturers to invest in higher-performance approaches ahead of a future Code cycle.

Q8. Should Ontario adopt the National Code's Tiered Energy Performance Framework?

Yes. This is the area of greatest relevance to CACEA's mandate and membership. CACEA recommends:

- Ontario formally adopt the NBC's tiered framework for housing energy performance, beginning at Tier 3 (consistent with SB-12's current approximate performance level), with a published multi-year plan for progression, following the model already used by the Atlantic provinces.
- Registered EAs should continue to provide independent, qualified verification of energy performance within any updated framework, and any tier progression should be paired with a corresponding investment in trades training and contractor education.
- For operational carbon, a requirement newly introduced in the 2025 NBC, we recommend Ontario begin at Level F, the most conservative available level, given how new and still-maturing this requirement is nationally.
- We also recommend Ontario begin monitoring embodied carbon requirements, which the national code is expected to introduce around 2030, so that a plan is already underway rather than beginning that work only once the requirement arrives.

On whether current requirements should be simplified or enhanced, CACEA's view is that these are not mutually exclusive. Simplification of documentation and administrative processes (see Q1 and Q4) can and should occur regardless of which tier or compliance path is ultimately selected. Whether requirements themselves should be enhanced by adopting a higher tier is a separate policy question that, in CACEA's view, should be informed by a published, multi-year adoption pathway rather than decided as a single, static threshold, so that the housing sector can plan and invest with confidence in the province's direction.

One practical consideration to consider: Tiers 4 and 5 of the national framework require blower-door (airtightness) testing as part of their compliance packages. This test is not yet a standard practice under Ontario's current requirements. We recommend any plan for progression beyond Tier 3 include a parallel plan for making airtightness testing more widespread, so the higher tiers are practically achievable, not just achievable on paper — with the added benefit of homes that are more resilient during extreme heat, cold, or power outages.