November 27, 2026

The Honourable Carson Binda
Minister of State for Red Tape Reduction
Parliament Buildings
Victoria, BC V8V 1X4
Email: Carson.Binda.MLA@leg.bc.ca

Re: Reducing Red Tape in Home Building: An Offer from BC's Energy Advisors

Dear Minister Binda,

On behalf of the Canadian Association of Consulting Energy Advisors (CACEA), our BC membership and the Energy Advisors working throughout the province, congratulations on your appointment as Minister of State for Red Tape Reduction. Founded in 2017, CACEA is the national voice for Energy Advisors, who improve the energy efficiency, resilience and comfort of new and existing homes, and serves as a trusted resource for homeowners, industry partners and policymakers. CACEA shares your government's goal of making it faster and less costly to build homes in British Columbia.

Your mandate directs you to reduce provincial regulatory requirements to 2017 levels by the end of this term and to introduce a one-in, two-out rule. Home builders feel the cost of unnecessary regulation every day, and we support this work. As you review building regulations, we encourage you to distinguish between rules that add cost and tools that reduce it. **We respectfully ask that your government:** (1) target the patchwork of municipal requirements layered on top of the BC Building Code; (2) retain the Step Code performance path, which gives builders flexibility rather than prescribing how to build; and (3) consult Energy Advisors on which building requirements add value and which only add cost.

Energy Advisors are impartial, federally registered Part 9 residential construction professionals, trained in building science and in assessing the house as a system, who model, test and report on code compliance for homes across BC. Energy Advisors work alongside builders on projects across BC, so they see first-hand where requirements add cost and delay.

1. **Municipal add-ons create a patchwork.** Builders working in several communities can face different energy requirements in each, adding design time, cost and confusion. One provincial standard, with municipal requirements above the Building Code limited as your government has directed, removes this duplication. Accepting Energy Advisors' compliance reports consistently across municipalities would reduce it further.
2. **The performance path offers flexibility.** Prescriptive requirements specify exactly what must be installed, regardless of whether it suits the project. The performance path instead sets the result a home must achieve, allowing builders and Energy Advisors to identify the most cost-effective way to meet it. In one case, performance modelling

showed that an owner-built home met its target without the window upgrades required by a local bylaw, saving the owner tens of thousands of dollars.

3. **Verification is not red tape.** Energy Advisor testing under the Government of Canada's EnerGuide Rating System is a market-based service that catches costly problems while they are still easy to fix. Owner-builders who skip mid-construction testing regularly spend more than $10,000 to seal air leaks in a finished home. Removing verification would not reduce costs; it would shift them to homeowners after the fact.

The Energy Step Code has been in place since 2017, the baseline year your mandate sets. For builders, the burden is not the performance path itself but the additional requirements layered on top of it. Specifically, CACEA offers:

- field examples showing where building requirements add cost without benefit;
- a briefing for you and your staff on how energy compliance works on a typical BC home; and
- experienced Energy Advisors to advise on reviews of building-related regulations.

We respectfully request the opportunity to meet with you and your team in the coming months. CACEA will follow up with your office in the coming weeks to arrange a meeting. In the meantime, please contact Cindy Gareau at manager@cacea.ca or 888-315-2774 with any questions.

Respectfully,



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cc: The Honourable Gavin Dew, Minister of Economic Development and Tourism and MLA for Kelowna-Mission; The Honourable Cathie Ounsted, Minister of Local Government, Housing, Sport and Culture; The Honourable Zeeshan Wahla, Minister of State for Housing; CACEA Board of Directors