



Together we make a difference

2017 Next Edition Building Code Consultation
Ministry of Municipal Affairs and Housing
Municipal Services Division
Building and Development Branch
777 Bay Street
2nd Floor
Toronto, Ontario
M5G 2E5

August 21, 2017

Re: input on proposed requirements to reduce greenhouse gas (GHG) emissions in the building sector through changes to the Building Code.

BurlingtonGreen, August 2107

To Whom It May Concern,

BurlingtonGreen Environmental Association welcomes the opportunity to offer input regarding the proposed requirements to reduce greenhouse gas (GHG) emissions in the building sector through changes to the Ontario Building Code.

We support the code's principles to reduce greenhouse gas (GHG) emissions in the building sector as part of the implementation of the government's Climate Change Action Plan (CCAP), which was released in June 2016.

We are pleased to offer our comments and suggestions for how the Ontario Building Code could be enhanced to more fully address the critical issues of climate change and greenhouse gas (GHG) reduction in the building sector:

Established in 2007, BurlingtonGreen is a citizen-led, not-for-profit environmental organization. Through awareness, advocacy, and action we mobilize the community to make Burlington a healthier, more environmentally responsible City. To learn more please visit www.burlingtongreen.org.

For inquiries please contact: Amy Schnurr, Executive Director, BurlingtonGreen Environmental Association, amy@burlingtongreen.org, 905-466-2171

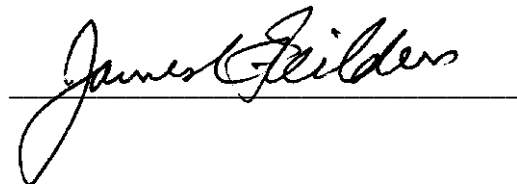
Potential changes for the next edition of the Ontario Building Code that are being considered to reduce GHG emissions include:

- Energy efficiency requirements for houses
- Energy efficiency in large buildings
- Energy efficient renovations in houses and large buildings
- Electric vehicle charging in new multi-unit residential buildings
- Other green technologies

Referring only to energy efficiency suggests that the continued use of natural gas and other fossil fuels is encouraged as long as it is more efficient. By looking at examples from Canadian cities, such as London Ontario's [West 5](#), the case for a tighter Building Code, that requires no natural gas in new developments, is suggested. This should also be the case for retrofits. This can be done by requiring a minimum greenhouse gas (GHG) reduction when retrofitting existing heating systems and a maximum permissible GHG emission level for new builds. Heat pumps can achieve as much as an 80% GHG reduction versus an old, low efficiency gas furnace. A new high efficiency gas furnace will at best provide a 15% reduction. As the price of electricity is controlled in Ontario and natural gas costs continue to increase through cap and trade, the annual operating costs for heating using electric heat pumps will be competitive with natural gas. For homes that currently do not have air conditioning, cooling is a bonus.

BurlingtonGreen appreciates the opportunity to offer input on this important issue and encourages the implementation of the government's Climate Change Action Plan (CCAP) to ensure a more sustainable Canada for generations to come.

Sincerely,



Jim Feilders
Advocacy Team Chair
BurlingtonGreen Environmental Association
jim@burlingtongreen.org

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