

Established in 1889, the Ontario Association of Architects (OAA) is the self-regulating body for the province's architecture profession. It governs the practice of architecture and administers the Architects Act in order to serve and protect the public interest.

The Secretary, Canadian Board for Harmonized Construction Codes
1200 Montreal Road, Building M-20
Ottawa, ON K1A 0R6

Sent by email to: CBHCCSecretary-SecretaireCCHCC@nrc-cnrc.gc.ca

June 22, 2026

Re: Spring 2026 Public Review of Proposed Changes to the 2025 National Model Codes

To Whom It May Concern:

The Ontario Association of Architects (OAA) continues to monitor and respond to proposed changes to the 2025 editions of National Model Codes. In its role of serving the public interest, the Association undertook a line-by-line review of the proposed changes in the Spring 2026 Public Review and is pleased to see that CBHCC is considering changes related to accessibility and energy efficiency.

The OAA's current five-year [Strategic Plan](#) includes a commitment to address two very important environmental and social governance themes—[Climate Action](#) and [Equity, Diversity, and Inclusion](#)—that act as lenses through which the OAA views its work of regulating the practice of architecture. It applied this same approach in reviewing the proposed Code changes.

The Association notes that many of the proposed amendments are administrative in nature and supports the proposed wording. However, there are three proposed changes that the OAA urges CBHCC to consider in more detail:

1. [2029 – Accessible Menstrual Product Dispensers: Control Design](#): Regarding this change, the OAA supports the proposed change as is with comment(s).

The Association applauds CBHCC for considering accessibility in the context of menstrual product dispensers. To expand inclusion, the Association encourages CBHCC to consider requiring that, where installed, all menstrual product dispensers be accessible.

2. [2038 – Application of Automatic Sprinkler Systems and NFPA 13R](#): Regarding this change, the OAA supports the proposed wording with comments.

In particular, the CBHCC's Standing Committee on Fire Protection may want to review and consider adjustments to the proposed updated clauses. Proposed Change PCF 2038 (and the associated changes to Section 3.2.5.12 Automatic Sprinkler Systems) rely heavily on clarification found the Appendix Notes. The OAA suggests CBHCC consider whether this information should instead be incorporated directly into Part 3.



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There may also be an opportunity to be more explicit about whether the requirement applies solely to multiple major occupancies or to single-occupancy buildings as well.

3. [2043 – Tiered Energy Compliance: Tier 2 Prescriptive Path](#): The Association supports the proposed wording in this change as is.

The OAA strongly believes that incorporating objective, tiered performance metrics into National Model Codes provides clearer expectations for energy use across all building types and better positions Canada to meet its emissions-reduction targets. The Association encourages CBHCC to continue its work on enhancing energy efficiency in the National Model Codes.

The OAA enjoys a longstanding, collaborative relationship with government and policymakers, and looks forward to continued work with CBHCC. Please do not hesitate to reach out should you have further questions or need clarification.

Yours truly,



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President

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OAA's Submission - Spring 2026: Public Review of Proposed Changes to 2025 National Model Codes

Table: Potential Changes To the NBC 2025, NPC 2025 and NECB 2025:

Background from CBHCC:

The proposed changes included in this public review address the following topics in the National Building Code of Canada, the National Energy Code of Canada for Buildings, and the National Plumbing Code of Canada: use of combustible cladding, residential energy efficiency, fire protection, modular construction, and accessibility, amongst others.

The purpose of this public review is to provide code users, the Codes community, and the public with a detailed look at proposed technical changes, and seek comment on each proposed technical change as to whether it should be approved, altered or withdrawn.

Legend for Rankings: **1.** I support this proposed change as is. | **2.** I support this proposed change as-is with comment(s). | **3.** I support this proposed change with modification(s).
 | **4.** I do not support this proposed change for the reason(s) stated to the right. | **5.** I have reviewed this proposed change and I have no opinion on it. | **6.** Not Reviewed

National Building Code 2025

Proposed Code Reference and Title	Reference : CBHCC's Proposed Change Number (for additional details, refer to the worksheets)	Number of Proposed Changes	Ranking 1-6	Status	Comments - Ontario Association of Architects
Division A					
Part 1 - Compliance		1			
1.1.1.1. Application of this Code					
2157 - Moving the Reference to CSA A277, "Procedure for certification of prefabricated buildings, modules, and panels," from a Division A Note to a Division C Provision	2157		1	I support the proposed wording as is.	
Division B					
Part 3 - Fire Protection, Occupant Safety and Accessibility		10			
3.1.8.3. Continuity of Fire Separations					
1781 - Fire Test Method for Firestops at Perimeter Joints	1781		1	I support the proposed wording as is.	
3.2.3.7. Construction of Exposing Building Face					
1684 - Revision of Intent Statements and Attributions for NBC Sentences 3.2.3.7.(3) and (4)	1684		1	I support the proposed wording as is.	
3.2.4.19. Visible Signals					
1778 - Replace the Term "Hearing Impairment" with "People with Low or No Hearing"	1778		1	I support the proposed wording as is.	

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National Building Code 2025

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3.2.5.12. Automatic Sprinkler Systems					
2038 - Application of Automatic Sprinkler Systems and NFPA 13R	2038		2	I support the proposed wording as is with comment(s).	The CBHCC’s Standing Committee on Fire Protection may want to review and consider adjustments to the proposed updated clauses. Proposed Change PCF 2038 (and the associated changes to Section 3.2.5.12 Automatic Sprinkler Systems) rely heavily on clarification found the Appendix Notes; CBHCC may wish to consider whether this information should instead be incorporated directly into Part 3. There may also be an opportunity to be more explicit about whether the requirement applies solely to multiple major occupancies or to single occupancy buildings as well.
3.3.1.8. Headroom and Protruding Objects					
1644 - Replace the Term "Visually Impaired Persons" with "People with Low or No Vision"	1644		1	I support the proposed wording as is.	
3.7.2.3. Lavatories					
2007 - Lavatory Supply Fittings in Public Washrooms	2007		1	I support the proposed wording as is.	
3.8. Accessibility					
1644 - Replace the Term "Visually Impaired Persons" with "People with Low or No Vision"	1644		1	I support the proposed wording as is.	
1778 - Replace the Term "Hearing Impairment" with "People with Low or No Hearing"	1778		1	I support the proposed wording as is.	
3.8.3.8. Controls					
2054 - Clarification of Installation Location for Accessible Controls	2054		1	I support the proposed wording as is.	

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3.8.3.16. Lavatories and Mirrors					
2029 - Accessible Menstrual Product Dispensers: Control Design	2029		2	I support the proposed wording as is with comment(s).	Regarding this change, the OAA applauds CBHCC for considering accessibility in the context of menstrual product dispensers. To expand inclusion, the Association encourages CBHCC to consider requiring that, where installed, all menstrual product dispensers be accessible.
Part 9 - Housing and Small Buildings		4			
9.8.7.3. Termination of Handrails					
1644 - Replace the Term "Visually Impaired Persons" with "People with Low or No Vision"	1644		1	I support the proposed wording as is.	
9.9.5.3. Obstructions in Public Corridors					
1644 - Replace the Term "Visually Impaired Persons" with "People with Low or No Vision"	1644		1	I support the proposed wording as is.	
9.10.9.2. Continuous Barrier					
1781 - Fire Test Method for Firestops at Perimeter Joints	1781		1	I support the proposed wording as is.	
9.36.11.					
2043 - Tiered Energy Compliance: Tier 2 Prescriptive Path	2043		1	I support the proposed wording as is.	
Division C					
Part 2 - Administrative Provisions		1			
2.2.7.5. Off-Site Review					
2157 - Moving the Reference to CSA A277, "Procedure for certification of prefabricated buildings, modules, and panels," from a Division A Note to a Division C Provision	2157		1	I support the proposed wording as is.	

Supporting Documents

[Supporting Costing Information for PCF 2043](#)

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National Energy Code 2025

Proposed Code Reference and Title	Reference : CBHCC's Proposed Change Number (for additional details, refer to the worksheets)	Number of Proposed Changes	Ranking 1-6	Status	Comments - Ontario Association of Architects
Division B					
Part 5 - Heating, Ventilating and Air-conditioning Systems		2			
5.2.3.1. Application					
2109 - Fan Motor Power Threshold for the Application of Prescriptive Requirements	2109		1	I support the proposed wording as is.	
5.2.12.1. Unitary and Packaged HVAC Equipment					
2105 - Change SCOP to "Net Sensible COP" in Table 5.2.12.1.-H as the Metric Used for Computer Room Air Conditioners	2105		1	I support the proposed wording as is.	
Part 8 - Building Energy Performance Compliance Path		1			
8.4.2.9. Air Leakage					
1943 - Harmonizing the Standard for Whole Building Air Leakage Testing	1943		1	I support the proposed wording as is.	

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National Plumbing Code 2025

Proposed Code Reference and Title	Reference : CBHCC's Proposed Change Number	Number of Proposed Changes	Ranking 1-6	Status	Comments - Ontario Association of Architects
Division B					
Part 2 - Plumbing Systems		1			
2.4.6.4. Protection from Backflow					
2137 - Installation of a Backwater Valve for Plumbing Fixtures Located Below the Upstream Sanitary Manhole	2137	1	1	I support the proposed wording as is.	No comments