

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

July 4, 2025

Re: Phase 1: Embodied GHG Draft Policy Positions

To Whom It May Concern:

The Ontario Association of Architects (OAA) continues to monitor and respond to proposals to harmonize Ontario's Building Code with the National Model Codes. In its role of serving the public interest, the Association is particularly watching the impact of harmonization on operational and embodied carbon, as well as other measures to address the climate crisis.

The OAA applauds the Canadian Board for Harmonized Construction Codes (CBHCC) for contemplating the inclusion of technical requirements related to operational greenhouse gas (GHG) emissions, along with the ongoing objective to address GHG emissions for new houses and buildings. The Association believes the inclusion of objective, tiered performance metrics can clarify energy use in all buildings and help position Canada to achieve its emissions reduction targets.

In particular, the OAA has long supported objective targets based on Total Energy Use Intensity (TEUI) for a wide range of building occupancies as a best practice. This is demonstrated by the OAA's own suite of [TEUI Calculators](#), offered to architects, design/construction professionals, and the wider public for free. Intensity metric thresholds provide a clear target for required performance that designers can:

- understand and use at any point in their design process;
- relate to science-based emissions reduction pathways;
- employ to facilitate apples-to-apples comparisons between projects; and
- aggregate into portfolio metrics that will not become obsolete as modelling guidelines evolve.

The reporting framework categories included in Figure 1 of the [CBHCC discussion paper](#) are the same as those used by the International Organization for Standardization (ISO) and the European Union (EU). It appears, however, that CBHCC is considering adopting a smaller subset of categories than those used by the ISO and EU.



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The OAA believes that CBHCC is uniquely positioned to take a leadership position on GHG emissions. Given that the National Energy Code of Canada for Buildings (NECB) and the National Building Code (NBC) are not mandatory until provinces and territories adopt them, the CBHCC should endorse and advance the full reporting scope that is currently applied in the European Union. The OAA strongly recommends CBHCC adopt the full reporting scope.

The OAA is steadfast in its position that Canada and its Building Codes must be concerned with the carbon emissions of the fossil fuels embodied in the construction and operation of buildings because of the carbon intensity of such sources. It is possible to easily and substantially reduce or eliminate fossil fuel loads through design.

Amid the global climate emergency, policymakers must look toward reducing and ultimately eliminating carbon emissions from buildings (existing and new) as a key factor in advancing climate action. It is imperative that sustainable practices be used in new building methods to ensure they are not inherently working against the public by compromising Canada's natural resources.

Buildings and their construction contribute significantly to the climate crisis, but they can also be instrumental in advancing climate action. CBHCC can make a meaningful contribution in this area. With the codes currently under review, the time to act is now.

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.

Sincerely,



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President

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