



Community Builders... Building Communities



February 26, 2018

The Honourable John Horgan
Premier of British Columbia
Parliament Buildings
Victoria BC V8V 1X4

Dear Premier,

RE: Step Code and Radon Gas

Further to our concerns re: Step Code, there are issues arising that put the health of British Columbians at risk. An SFU scientist says Vancouver's North Shore has a potentially high risk of radon gas, which can cause cancer and other illnesses.

Some municipalities in that region are jumping to Tier 3 of the Step Code, (it is a Leap Code, not a Step Code), without knowing the unintended consequences of being in a radon gas zone. As energy efficiency is increased, new homeowners may be at risk of radon gas exposure, especially in very tight building envelopes.

Your government is presently reviewing the code and says, "There is new evidence of radon in buildings in areas that were formerly not known to have elevated levels of radon." However, they say it is up to municipalities to establish their own radon data and the need for radon vents.

The SFU scientist says, "You don't want people who don't understand [the problem] to try and determine if they have a municipal problem. It's a health risk." The same can be said of 162 BC municipalities cherry-picking their own energy efficiency standard, undermining a provincial code standard.

Fast-tracking energy efficiency via the Step Code puts consumers at risk. Your government admits it had no knowledge of the radon issue and there may be other unintended consequences such as leaky condo syndrome Part 2 unless careful diligence is practiced.

We suggest a moratorium on the Step Code subject to reviews of energy efficiency by the National Building Code committee presently underway. In addition, BC's cost/benefit study should be revised. The past study undertaken, after the previous Minister signed the Step Code, does not reflect the true costs in our survey of VRBA builders in the real world of construction.

We would be pleased to meet with you and/or your Housing Minister to further discuss how health, safety and affordable energy efficiency may be improved in British Columbia.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Casey Edge', with a stylized, cursive script.

Casey Edge
Executive Director

Cc Right Honourable Justin Trudeau, Prime Minister of Canada
 Right Honourable Jean-Yves Duclos, Minister of Families, Children and Social
 Development
 Honourable Selina Robinson, Minister of Municipal Affairs and Housing
 Anne C. Gribbon, Secretary, Canadian Commission on Building and Fire Codes





Community Builders...

Building Communities

March 29, 2018

Dear Mayor and Council,

RE: Update on BC Step Code

Attached is a letter to VRBA from the Honourable Jim Carr, Minister of Natural Resources for Canada describing the plan and timeline for energy efficiency improvements to the National Building Code.

Carr says, "As part of a plan to make buildings more efficient, Natural Resources Canada and the National Research Council will support the work of the Canadian Commission on Building and Fire Codes to develop a new net-zero energy model code by 2022 for adoption by provinces and territories by 2030."

Carr does not say he supports BC's Step Code.

He says, "The (national) code development process is collaborative, consensus-based and includes public consultations. Development of model energy codes for buildings will consider cost effectiveness and affordability and benefit from evidence-based research. Analysis on the potential cost implications for homeowners is underway. The results of this analysis will be made available as part of the public consultations taking place during the code development process."

In other words, cost implications for homeowners will be available during a public consultation, which was not done for BC's Step Code. The national affordability consultation is expected to be launched in Fall 2019. In BC, the minister signed the Step Code regulation prior to the cost/benefit analysis, which is not normally part of responsible code development. BC's cost/benefit differs significantly from our builders' cost estimates.

VRBA provides input into National Code initiatives and recently discussed the Step Code process with national officials. They report that in addition to performance testing, their plan will include a prescriptive option not available in BC's Step Code. This is important to avoid bottlenecks and rising costs that may arise from insufficient testing capacity. Clearly the National Code's goal is also Net Zero by 2030. However unlike BC, they are being diligent to address affordability, builder education support, attention to materials and practices, and potential unintended consequences.

There is a signed agreement to harmonize BC's code with the National Code, which is violated by BC's Step Code. The BC govt leaped ahead under the pretext tighter homes are required now. By deviating from the national code process, BC irresponsibly fast-tracks energy efficiency, puts homeowners at risk and adds significant cost for negligible benefit. Most energy loss is from older homes, not new homes. Also, municipalities are responsible for establishing and enforcing the province's Step Code Tiers - a big responsibility. The Municipal Insurance Association says "Building bylaws are one of local governments' greatest exposures to liability risks." Your municipality voluntarily invokes the Step Code, not the province.

Our recommendation is municipalities should disregard BC's Step Code and instead wait for the National Building Code's diligence, affordability study and public consultation. When the National Code responsibly increases energy efficiency, the BC building code will follow as part of the mandatory provincial code.

Feel free to contact me for any additional information.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Casey Edge", written over a light blue horizontal line.

Casey Edge
Executive Director

Minister
of Natural Resources



Ministre
des Ressources naturelles

Ottawa, Canada K1A 0E4

MAR - 9 2018

Mr. Casey Edge
Executive Director
Victoria Residential Builders Association
1-3690 Carey Road
Victoria, British Columbia V8Z 4C2

Dear Mr. Edge:

The Prime Minister's Office has forwarded to me a copy of your letter of October 6, 2017, about energy-efficient housing and consumer protection as part of building code development.

Under the Pan-Canadian Framework on Clean Growth and Climate Change, the federal, provincial, and territorial governments are working together to take strong action to address climate change. Homes and buildings are one of the largest sources of greenhouse gas (GHG) emissions in Canada. We know that making them more energy efficient will not only reduce GHGs but also save Canadians money on energy bills.

As part of a plan to make buildings more efficient, Natural Resources Canada and the National Research Council will support the work of the Canadian Commission on Building and Fire Codes to develop a new net-zero energy model code by 2022 for adoption by provinces and territories by 2030.

The code development process is collaborative, consensus-based and includes public consultations. Development of model energy codes for buildings will consider cost effectiveness and affordability and benefit from evidence-based research. Analysis on the potential cost implications for homeowners is underway. The results of this analysis will be made available as part of the public consultations taking place during the code development process.

The federal, provincial, territorial governments are also working together with industry to find cost-effective solutions that work for Canadians by supporting innovation programs in the building sector through research, development and demonstration. Our government is focused on ensuring Canadians are consulted on what makes sense for them and driving innovation that leads to more energy-efficient buildings and good jobs for Canadians. In this way, we will continue to deliver on our commitment to show that economic growth and environmental protection can go hand in hand.

As the National Research Council serves as the secretariat for the Canadian Commission on Building and Fire Codes, I encourage you to contact one of its representatives, Mr. Frank Lohmann. You can reach him at frank.lohmann@nrc-cnrc.gc.ca to share your feedback and obtain information on the timing of future public consultations.

Thank you for writing.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Jim Carr', with a stylized, flowing script.

The Honourable Jim Carr, P.C., M.P.



Todd Halaburda
President, VRBA

BC CIRCUMVENTS NATIONAL CODE DILIGENCE

The Hon Jim Carr, Minister of Natural Resources for Canada replied in a letter to VRBA's concerns regarding BC fast-tracking housing energy efficiency via the Step Code.

Carr says, "As part of a plan to make buildings more efficient, Natural Resources Canada and the National Research Council will support the work of the Canadian Commission on Building and Fire Codes to develop a new net-zero energy model code by 2022 for adoption by provinces and territories by 2030."

Carr does not say he supports BC's Step Code.

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In other words, cost implications for homeowners will be

available during a public consultation, which was not done for BC's Step Code for new housing.

There is a signed agreement to harmonize BC's code with the National Code, which was violated by the Step Code.

BC's govt has leaped ahead under the pretext tighter homes are required prior to the 2022 goal set by the National Code.

By deviating from the National Code process, BC has put homeowners at risk and added significant cost for negligible benefit. Most energy loss is from decades-old homes, not new homes.

By enabling 160 municipalities to set their own energy efficiency level, BC undermines its own building standard.

BC municipalities should disregard the Step Code and wait for the National Building Code to do its diligence, affordability study, and public consultation.

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RESIDENTIAL BUILDERS
ASSOCIATION