



Community Builders...

Building Communities

September 14, 2017

Dear CRD Chair and Board,

RE: Step Code Survey to VRBA Members

This is the official reply from VRBA's Builders Council to your Step Code Survey request. The Step Code as proposed fast-tracks energy efficiency, undermines national and provincial code standards and puts consumers at risk. Our concerns include:

1. The Step Code redirects the BC Building Code's primary mandate from health and safety to climate change. Climate change is important, but consumer protection must come first, as demonstrated by leaky condo, asbestos, and urea formaldehyde insulation.
2. The Step Code does not effectively address climate change. There is a reduction of only 1 or 2 air changes per hour (GHGs) in already energy efficient, new homes. Renovation of an older home can save 20 air changes.
3. The province agreed to harmonize BC's Building Code with the National Code. The Step Code violates that agreement, neglects national due diligence and undermines consumer protection.
4. BC's previous government signed the Step Code in April **prior** to a cost/benefit study. These studies normally provide critical information for the minister before signing.
5. The government's present estimated costs, yet to be released, are much lower than indicated in our own survey of VRBA builders. The government does not build and sell homes. When the public calls for quotes, they will not resemble the government's estimates.
6. Enabling 160 municipalities to cherry-pick 1 of 5 energy efficiency steps is a recipe for unintended consequences. High levels of energy efficiency require education and proven practice, not yet sufficiently demonstrated in large numbers.

Our view is if the Step Code must be introduced, it should only occur at a low tier (1 or 2) and increased only in 5 year increments after affordability, education and proven practice have been established, which still gets the province to its stated goal of Net Zero by 2032. Climate change is most effectively addressed now by reducing air changes in older homes via a renovation tax credit using a small percentage of BC's \$2 billion Property Transfer Tax revenue.

Please be aware that presently, a builder **agrees** to build beyond the code in exchange for a rezoning. Municipalities, via the Step Code, will be **imposing** a higher code standard on all builders and accept greater responsibility based on their assessment of builder competence in the region. BC Housing is the province's licensing authority. In our view, municipalities are not equipped to make such an assessment. In addition, a survey and workshop are entirely inadequate to assess the expertise of the region's builders.

VRBA will have a booth (#409) at the UBCM Trade Show and I would be pleased to further discuss this issue, energy efficiency and housing affordability.

Yours sincerely,

Casey Edge
Executive Director

cc Hon Selina Robinson, Minister of Municipal Affairs and Housing
CRD municipalities