



Community Builders...

Building Communities

May 26, 2020

Dear CRD Chair, Municipal Mayors and Councils,

RE: Unintended Consequences re: Increasing Energy Efficiency

Attached are memos from committees reporting to the Canadian Commission on Building and Fire Codes (CCBFC) identifying the unintended consequences of increasing energy efficiency in new housing. These are public documents included in the "May 22, 2020 (2020-09) Meeting of the Standing Committee on Housing and Small Buildings." The concerns include:

Required Cooling

Overheating risks may occur in buildings when building envelopes are tightened while using high solar heat gain windows creating potential health risks for occupants.

Attachment of Exterior Insulation and Cladding

Installation of more exterior combustible insulation may change the risk of fire spread between buildings.

Improved Air Tightness and Soil Gas Ingress

Improvements in the effectiveness of the air barrier may create increased risk related to soil gas ingress eg radon.

The CCBFC Executive responds:

Addressing potentially unintended consequences

The work on unintended consequences is of the utmost importance before the energy efficiency requirements for houses (NECB and Section 9.36.) can be finalized for the 2020 code.

The issues raised above are not exhaustive and due diligence is necessary to ensure health, safety, and consumer protection – the purpose of building code standards. BC is unwisely fast-tracking energy efficiency in new homes via the Energy Step Code, which is actually a Leap Code enabling municipalities to bypass steps. These documents outline some of the potential unintended consequences.

VRBA supports the due diligence by the National Building Code and advises against code changes (eg BC Energy Step Code) until after this diligence has been completed and the National Code approved. Feel free to contact me for additional information.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Casey Edge".

Casey Edge
Executive Director