



# CHBA BC POSITION ON THE BC ENERGY STEP CODE

This position speaks to the province-at-large. CHBA local associations are the experts on their local conditions and should be the authoritative voice of the industry during municipal consultations.

We do not fear a tiered-code system. It provides predictability and transparency. **The biggest challenge is inter-governmental pressures that may drive implementation of higher steps beyond the recommended Provincial approach and inconsistent implementation across municipalities.** Accelerating market transformation without first resolving market barriers will be problematic for all.

## Affordability

Housing affordability should be an overarching principle in Building Code development and addressing greenhouse gas (GHG) emissions in residential construction, by considering capital and life cycle costs that will impact British Columbians. CleanBC's pathway must remain affordable at all steps, for all housing types, home buyers, and climate zones.

## Accessibility

The province must not overlook regional needs and concerns, nor focus solely on areas with the largest housing starts as the measure of success. Market accessibility parameters include training, product availability, and access to qualified professionals.

## Alignment

Design restrictions and guidelines imposed by local governments through bylaws, registered building schemes and restricted covenants may significantly impact energy efficient and low carbon building design. Examples include heritage or character guidelines, setback requirements, the need for unique form and massing, or building articulation on account of architectural considerations from design panel review. **Local governments should minimize policy, process and permitting barriers that unintentionally disadvantage energy efficient, low carbon housing by amending land use and zoning policies.**



## Step by Step

Any implementation challenges must be resolved before widespread regulation or expansion to higher steps can be considered or supported. If a delayed implementation of 2030 targets prevents unintended consequences, it is worth adjusting timelines as needed.

Local governments should be able to follow the Step Code as regulated, to support a consistent approach to implementation that allows the market to gradually build capacity and skills. **Measurement-only of GHG emissions for buildings is a critical first step that should not be skipped.**

Before implementing the Step Code and carbon pollution standards, local governments should consider:

- Incentives, including density bonus and fast-tracking building permits
- Cost-benefit analysis
- Industry knowledge and capacity
- Availability of necessary materials, and
- Proximity of licensed energy advisors to ensure a cost-effective and competitive environment.

## Evidence-based Harmonization with National Codes

Proposed changes to the National Code are under development that include a stepped approach to meeting energy performance targets. Prior to harmonizing National requirements related to the Step Code, careful consideration of evidence is needed to ensure the outcomes are in line with Provincial goals.

## Leadership with Home Labelling Programs

CHBA BC is a service organization licensed by Natural Resources Canada. We train and license energy advisors and deliver voluntary programs, including the CHBA Net Zero Home Labelling Program, ENERGY STAR® for New Homes and R-2000\*, which are based on the EnerGuide Rating System\*.

We are in full support of a **standardized, home labelling program for new and existing homes**, innovation, and incentives to find the best ways of achieving higher levels of performance in a cost-effective way, to give builders an advantage, and to provide a great product for customers.

## Industry Consultation

Industry and government must be in regular communication. While government is the driver of regulation, builders and industry professionals are responsible for implementing changes successfully. Industry needs to be provided with **sufficient lead time and continual notification** to inform implementation and prepare for change.

This revised position was approved by the Canadian Home Builders' Association of British Columbia Board of Directors on October 27, 2021.

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