



January 28, 2019

Nathaniel Aguda
Environmental Policy Branch
40 St. Clair Avenue West
10th floor
Toronto ON M4V 1M2

Dear Mr. Aguda:

RE: ERO Posting 013-4208, Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan

The Residential Construction Council of Ontario (RESCON) is pleased to have the opportunity to provide comments regarding the government's Made-in-Ontario Environment Plan.

RESCON represents over 200 residential builders of high-rise, mid-rise and low-rise buildings in the province. The focus of RESCON's work is on technical standards; labour relations; industry research and innovation; health and safety; regulatory reform and streamlining; as well as training and apprenticeship.

One of the aspects of the Plan which we are pleased to see is the recommendation around sustainable forest management, particularly on increasing the use of Ontario wood products in building construction to reduce emissions and increase long-term carbon sequestration. RESCON has consistently advocated for the adaptation of the Ontario Building Code and applicable standards to facilitate the use of wood in buildings in Ontario. In the same vein, as part of RESCON's submission to the government on its Housing Supply Action Plan, one of the several recommendations put forth by RESCON is on the fact that the Province should fast-track Code changes to recognize and permit mass timber tall buildings, which are currently approved in British Columbia and Quebec.

Other jurisdictions in Canada and around the world have already changed building code provisions to allow tall - timber building construction of twelve or more storeys. The current Ontario Building Code limits wood buildings to six storeys. The government of Ontario should fast track proposed changes in the model National Building Code that would allow 12 story timber buildings that would, if the traditional consultation and Code amendment process were followed, come into effect in Ontario by 2021 or later. We should fast track these changes given the abundant international experience and proven track record of tall mass timber buildings including an 18-story building in Vancouver.

The Building Code requires further update to facilitate the use of factory built, prefabricated building components, such as wood framed wall, floor and roof sections. For example, the Ontario Building Code currently does not reference the updated CSA A277-16, "Procedure for Certification of Prefabricated Buildings, Modules, and Panels" standard which regulates the manufacturing of pre-fabricated wood



panels for homes and buildings up to six storey wood buildings currently permitted in the Ontario Building Code.

The benefits of fast-tracking prefabricated wood building components and tall timber construction include: 1) providing builders with another construction option for high rise buildings thereby increasing competition with steel and concrete which currently dominate this market; 2) tall timber construction is fast, quiet, and light weight (requiring simpler foundations), providing an excellent option of in-fill developments where existing neighbourhoods and residents are sensitive to noise and disruption; 3) it is an environmentally friendly building option. Infill development also supports other environmental objectives including more pedestrian and transit oriented urban form. Many jurisdictions around the world, including Quebec, British Columbia, Europe and Australia, are already allowing tall timber buildings – Ontario needs to catch up to increase choice and competition in the building sector.

RESCON is pleased to see that the Made-in-Ontario Environment Plan is moving in the right direction regarding the management of excess soils, highlighted by the recommendation for increasing the redevelopment and clean-up of containment lands in Ontario to put the land back into good use and making easier and safer to reuse excess soil. Properly managing excess soils would result in significant cost savings, given that on average, handling and disposal of excess soil represents 14 percent of the total project value, in a case study of 24 projects, which represents \$46 million.

RESCON would be happy to continue to work with the government as it addresses fundamental factors regarding the environmental health and prosperity of Ontario.

Sincerely,

Richard Lyall
President