



January 29, 2020

Joe Maure  
Forest Sector Strategy  
Ministry of Natural Resources and Forestry  
70 Foster Drive, Suite 160  
Sault Ste Marie, ON P6A 6V5

**RE: Ontario's Forest Sector Strategy Draft, ERO 019-0880**

The Residential Construction Council of Ontario (RESCON) is pleased to be invited to provide comments to the Ministry of Natural Resources and Forestry (MNRF) on their draft Ontario Forest Sector Strategy, "A Blueprint for Success". As a stakeholder in the wood and mass timber construction sector, we are happy to provide comments to better support forest product innovation and diversification as well as expand the market for Ontario's wood products.

RESCON represents over 200 residential builders of high-rise, mid-rise and low-rise buildings in the province. Our goal is to work in cooperation with government and related stakeholders to offer realistic solutions to a variety of challenges facing the residential building industry, which in turn have wider societal impacts. The focus of RESCON's work is on technical standards; labour relations; industry research and innovation; health and safety; regulatory streamlining; training and apprenticeship.

Our comments focus on ideas in the paper related to increasing the use of wood in buildings. Several proposals in the strategy paper align with RESCON's recommendations aimed at increasing housing choice and innovation through modernization and faster updates to the Ontario Building Code (OBC).

As noted in the draft strategy paper, the Province has supported four tall wood demonstration projects: a 12-storey Arbour development (by George Brown College); a 14-storey Academic Tower (at University of Toronto); a 12-storey residential condominium building (in North Bay); and an 8-storey office building in Toronto. RESCON commends the Province for supporting these projects; however, Ontario's building regulatory environment, still lags well behind that of other Canadian and international jurisdictions. To that end, more needs to be done to update the Ontario Building Code as well as related code compliance and enforcement systems.

**Comments on specific Strategy Paper proposals**

RESCON strongly supports the use of more wood in mid-rise and taller residential buildings. We believe that the Building Code should allow for all construction types that meet the very high safety and energy efficiency requirements in the Code. Introducing the option of using more wood will provide industry-wide benefits as it will increase competition resulting from more choice and more options. Should a



builder switch from steel or concrete to a wood structured system for certain types of taller buildings, the Building Code should be aligned with international best practice and should not be an obstacle to safe, energy efficient construction.

The Ontario Building Code currently limits the height of wood buildings to 6 storeys whereas in Oregon and some British Columbia municipalities, mass timber buildings of ranging from 12 to 18 storeys are permitted. Alberta will soon be permitting 12 storey mass timber buildings under its own Building Code. Quebec also allows for taller mass timber buildings as do many European countries. Currently in Ontario, builders who want to construct taller mass timber buildings, including those noted above that have been supported by MNRF, must rely on the more difficult and uncertain “alternative solutions” option to obtaining a building permit which is much more onerous on the applicant and designers. RESCON believes that harmonizing the Ontario Building Code with the National Building Code should be an urgent priority as Ontario is already well behind many other jurisdictions.

To ensure the successful and prompt harmonization of the Ontario Building code with the National Building Code it is imperative that government and industry work together. We believe that improved engagement with Ministry of Municipal Affairs and Housing’s divisions responsible for the management of the Ontario Building Code is necessary and essential to the success of Ontario’s Code harmonization efforts. Along with industry partners, RESCON will continue working with the Ministry of Natural Resources and Forestry as well as other relevant Ministries on moving forward quickly on harmonization.

We strongly support the idea of increasing the use of modular and prefabricated building components (e.g. open and closed building panels) in residential building projects. Increasing the use of closed panels and modules requires a modernized building regulatory regime that includes reference to updated standards.

It is important to note that the use of modules and closed panels in buildings, relies heavily on factory assembled and Building Code compliant components. Certification of factories means that closed panels and modules that often use advanced engineered wood products, do not need to be opened up on the building site and then inspected by municipal building officials. Certification of the factory by an accredited certification body and labeling of the prefabricated components means that the local building inspectors can rely on the factory certification to comply with the relevant building code requirements.

It is therefore important that the latest standards dealing with prefabricated panels and modules are referenced in the Building Code. The most recent standard is CSA-A277-16 that allows for a certified factory to produce closed panels or modules for various types of buildings including light wood framed buildings up to 6 storeys, which are now permitted under the OBC. If this latest version of the CSA A277 series of standards is not referenced, this hampers the ability for builders to use closed panels in buildings. This is because building officials could still require closed panels and modules to be opened at the building site for inspection, thereby negating many of the advantages of high-quality off-site construction.



This standard has already been referenced in the model National Building Code and is also recognized in Alberta through a binding ruling (Standata) by the provincial regulatory authority. RESCON has attempted to work with the Ministry of Municipal Affairs and Housing' Buildings Branch to facilitate a meeting with a group of Ontario industry experts on prefabricated buildings to see how the Province can move quickly to update the OBC to reference the latest version of the CSA-A277 series called CSA-A277-16. It should be noted that staff from the Buildings Branch were involved in developing current CSA-A277-16 standard.

Accordingly, RESCON recommends that increasing adoption of modular and panelized building, including those that use advanced engineered wood products, **be put on a faster track and move from a future action to an immediate action item.** This is a priority for RESCON and industry and an issue on which we will be working closely with government in the near term.

Regarding updating Ontario's Tall Wood Building Reference, RESCON fully supports this recommendation. It is our understanding that this document has been useful in helping users navigate the alternative solutions process here in Ontario. This goes together with the need to quickly harmonize the Ontario Building Code with the model National Building Code for tall mass timber provisions.

Thank you again for the opportunity to comment on this important draft strategy. RESCON would be happy to discuss our comments in greater detail and looks forward to continuing working with the government on spurring building sector innovation.

Regards,

Richard Lyall  
President

Copy to:

Alex Earthy, Senior Policy Advisor, Ministry of Municipal Affairs and Housing  
Stephanie DiNucci, Senior Policy Advisor, Ministry of Municipal Affairs and Housing  
Aubrey LeBlanc, Chief Administrative Officer, Ontario Building Officials Association  
Alex Nott, Mass Timber Engineer, Ministry of Natural Resources and Forestry  
Jason Koivisto, Manager, Ministry of Natural Resources and Forestry