

## Appendix I

April 18, 2024

Hon. Paul Calandra  
Minister of Municipal Affairs and Housing  
Government of Ontario  
777 Bay St, College Park  
17th Floor  
Toronto, ON M7A 2J3

Sent via: [Minister.MAH@ontario.ca](mailto:Minister.MAH@ontario.ca)

**Re: Consultation Feedback on the 2025 National Construction Codes (ERO number [019-8316](#)), *Building Code Act, 1992, S.O. 1992, c. 23***

Dear Hon. Minister Calandra,

On behalf of the City of Brampton, I am writing to provide comments for the proposed regulatory changes outlined in the 2025 National Construction Codes consultation (ERO number 019-8316), which will inform the forthcoming updates to the Ontario Building Code (OBC).

As we anticipate the adoption of the updated OBC by January 1, 2025, it is imperative to understand the scope of changes being considered at the national level, as detailed in the National Building Code (NBC), National Energy Code (NEC), National Fire Code (NFC), and National Plumbing Code (NPC). These changes will significantly influence our local building regulations and practices in the subsequent 2026/2027 OBC update cycle.

Summary of Feedback:

1. **Harmonization of Codes:** The editorial changes proposed aim to harmonize the codes at a national level, ensuring consistency and clarity across jurisdictions. This effort is commendable as it facilitates a more streamlined regulatory environment for construction professionals and stakeholders.
2. **Climatic and Seismic Adjustments:** The addition of detailed climatic and seismic data, particularly the clarifications in Part 4 regarding structural design for buildings to withstand seismic and wind forces, is a critical update that supports our commitment to safety and resilience in building constructions.
3. **Accessibility and Adaptability:** The proposed modifications to enhance accessibility, visitability, and adaptability in dwelling units, including a diverse array of housing types such as single-family homes, secondary units, and multi-family buildings like duplexes and townhouses, are particularly noteworthy. These changes are aligned with our goals to create inclusive communities.
4. **Radon Gas Control:** The inclusion of radon gas control measures reflects a proactive approach to public health and safety, addressing emerging concerns about environmental hazards in residential and commercial buildings.

5. **Innovations in Construction Materials:** Recognizing the latest advancements in construction materials within the codes will enable the adoption of new technologies and methods that can improve building quality and efficiency.
6. **Environmental Sustainability Initiatives:** Perhaps most importantly, the introduction of new performance compliance standards for greenhouse gas emissions and the enhanced energy performance for all building types are steps forward in our collective efforts to achieve a 2030 net-zero target under the National Energy Code.

While these initiatives represent significant advancements, the City of Brampton acknowledges that understanding and implementing these changes will require comprehensive guidance from the provincial government. We recommend ongoing engagement and detailed informational support as we transition to the new standards.

Moreover, it is essential that our Building Division be adequately prepared to integrate these changes effectively. We suggest the province consider facilitating training and development sessions to ensure municipal teams across Ontario are well-equipped to manage these new requirements.

We look forward to the formal adoption of the updated OBC in 2025 and appreciate the opportunity to participate in this consultation process. Please feel free to reach out should you require further information or clarification on our feedback.

Thank you for your attention to these matters.

Sincerely,

X

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**Steve Ganesh**

Commissioner of Planning, Building and Growth Management, City of Brampton