

# Consultation on Draft Policy Framework for Climate Change Mitigation

## Background

The Canadian Board for Harmonized Construction Codes (CBHCC) has agreed that the National Model Codes include an objective for greenhouse gas (GHG) emissions to enable provincial and territorial regulation, and this objective should be incorporated into the 2025 codes. This objective would include regulation of both operational and embodied carbon with operational being addressed in the 2025 codes and embodied carbon in the 2030 codes.

In the initial stages of developing this policy framework, provinces and territories (PTs) noted a number of elements for consideration, including:

1. principles and factors that all PTs agree on (e.g. ultimate goal and net zero emission definition, emission factors);
2. the need to accommodate the breadth of PT fuel policies, plans and individual PT targets, and coordinate with elements that extend beyond the boundary of the code;
3. regional differences (e.g. ability to fuel switch, availability of low embodied carbon materials in Northern and remote areas);
4. the boundary of operational emissions (e.g. address scope 1 only? Or address both scope 1 and scope 2 emissions?) and embodied emissions (i.e. determine standard method of analysis);
5. impact on affordability (e.g. interplay between energy efficiency and GHG requirements with respect to operational GHG emissions);
6. development and availability of data (e.g. better granularity of emission factors for operational carbon, better availability of Environmental Product Declarations for embodied carbon, standard method of analysis for embodied carbon);
7. implementation approach (e.g. phased approach, flexible approach to address specific needs of PTs);
8. adoption and implementation considerations including market readiness, training, capacity-building (monitoring, reviewing and enforcement), and developing tools to enable PTs to harmonize.

Prior to the transition to the new Harmonized Code Development System, the Canadian Commission on Building and Fire Codes (CCBFC) agreed to ask the standing committees to start working on developing technical requirements that would address GHG emissions in parallel to the ongoing policy work to:

- a. address the 8 policy elements identified by PTs, and
- b. develop language for a new GHG objective.

A federal, provincial, and territorial Working Group on Climate Change Mitigation (WG-CCM) was struck to consider the 8 policy elements identified by PTs. The 8 policy elements were triaged based on their relevance to the parallel technical work by the standing committees.

## Triage of Policy Elements

The CBHCC agreed to address the policy elements as follows:

First wave of policy elements (included in this consultation package):

- ✓ Policy element 1: principles and factors that CBHCC members agree on
- ✓ Policy element 4: the boundary of operational emissions and embodied emissions
- ✓ Policy element 7: implementation approach

Second wave of policy elements (future consultation):

- Policy element 2: the need to accommodate the breadth of PT fuel policies, plans and individual PT targets, and coordinate with elements that extend beyond the boundary of the code
- Policy element 3: regional differences
- Policy element 5: impact on affordability
- Policy element 6: development and availability of data
- Policy element 8: adoption and implementation considerations including market readiness, training, capacity-building, and developing tools to enable PTs to harmonize

## Consultation Periods

The CBHCC is seeking input from stakeholders, experts, code users, and the general public on the draft policy recommendations before finalizing the policy framework.

The draft policy recommendations will also be provided to the relevant standing committee(s) for discussion.

Consultation wave 1 begins on February 6, 2023 and end on March 30, 2023.

Consultation wave 2 is planned to begin in March 2023 and end in May 2023. Note that this consultation period is subject to change as the CBHCC is still working on the draft policy recommendations.

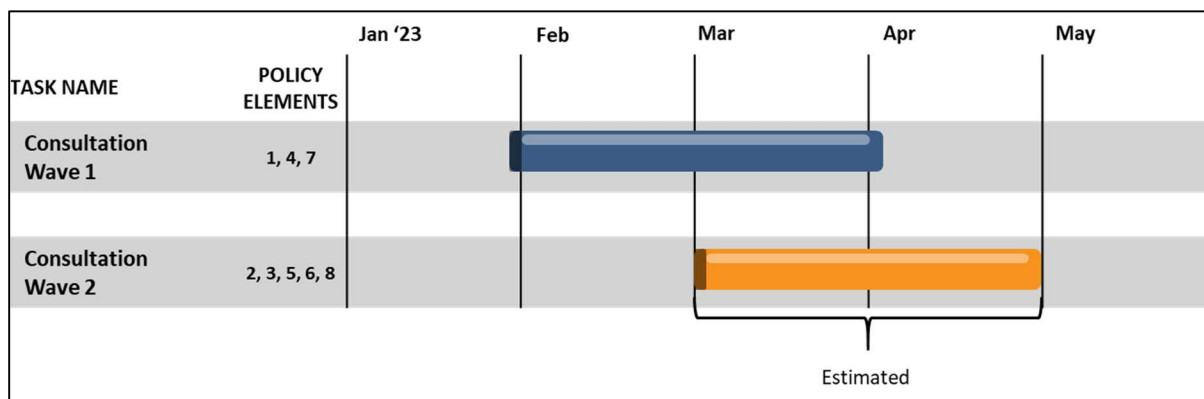


Figure 1: Estimated timeline for wave 1 and 2 consultation periods

## Instructions for providing input

To provide input on the policy recommendations, please follow the steps below:

1. Download the policy recommendations here: [CBHCC Policy Recommendations for consultation](#)
2. Submit comments to the CBHCC Secretary by email and attach any supportive material:  
[CBHCCSecretary-SecretaireCCHCC@nrc-cnrc.gc.ca](mailto:CBHCCSecretary-SecretaireCCHCC@nrc-cnrc.gc.ca)
3. Your comments will be reviewed by the Working Group on Climate Change Mitigation who will report to the CBHCC.