



MANITOBA ECO-NETWORK

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August 16, 2022

Honourable Reg Helwer
Minister of Labour, Consumer Protection and Government Services
minlcpgs@leg.gov.mb.ca

Dear Minister Helwer,

Re: 2015 National Model Construction Code Adoption

The Manitoba Eco-Network appreciates the opportunity to comment on the proposed Regulations associated with the adoption of the 2015 National Model Building Codes. Since 1988, MbEN has promoted positive environmental action by supporting people and groups in our community. MbEN's programming focuses on policy advocacy, engagement in consultation processes and developing capacity building tools that benefit the environmental non-profit sector and our member groups. We are a public interest environmental organization seeking to promote and facilitate good environmental governance and the protection of Manitoba's environment for the benefit of current and future generations.

MbEN is pleased the Government of Manitoba is taking steps to finally update Manitoba's building code standards. While any update to Manitoba's building codes is a positive step forward, we would like to see a commitment now to an implementation schedule that will ensure Manitoba's building codes are in compliance with the newer 2020 building codes as soon as possible. Manitoba should not wait until the end of the 24 month adoption period and instead should seek to lead the way in Canada by implementing the 2020 codes sooner than this deadline. The adoption of the 2015 building codes should be discussed as a transition phase as Government works on adoption of the 2020 codes. Overall, we feel the focus of the Government's current regulatory efforts should be on the implementation of the 2020 Building Codes.

First, it will be more cost efficient to adopt the 2020 codes as soon as possible. Instead of forcing government employees, firms and professionals to focus their time and money on learning a new set of codes that will only be in place for a limited amount of time, it would be much more efficient to adopt the 2020 codes and allow government and other professionals to focus their training on the most sustainable standards available.

Second, Manitobans have repeatedly shown that we are capable of designing and constructing new buildings that meet higher levels of energy efficiency and other sustainability standards than currently required by provincial law. There is no reason to delay the adoption of the 2020

code when Manitobans have already proven they can deliver projects that exceed current standards.

Third, adoption of the 2020 Building Codes will ensure building owners can avoid costly and complex retrofits in the coming years and reduce the amount they will pay in carbon tax in the long run. If we do not mandate more energy efficient buildings now, Manitobans will pay more for energy through the life of buildings - especially as the carbon tax increases. This will be a drain on our economy for decades to come whereas investing in more energy efficiency now would be a driver for our economy and new green jobs. We need to stop thinking short term and look at the long term effects of important decisions like these.

Finally, Adopting the 2020 Building Codes will help to address climate change by raising the minimum energy performance of all new buildings. This will result in less electricity and natural gas consumed which in turn will reduce Manitoba's GHG emissions and extend the ability of the existing hydroelectric facilities to meet the future demand for energy.

MbEN appreciates your consideration of our comments and recommended changes in relation to the adoption of the 2015 National Building Codes. We feel the Government of Manitoba should be prioritizing the adoption of the newer 2020 Building Codes instead of focusing on the adoption of the 2015 codes to ensure buildings in Manitoba are required to meet the same high standards as those in other provinces.

We welcome future opportunities to engage with the Department of Labour, Consumer Protection and Government Services to ensure the highest level of environmental protection measures are enacted to help us protect Manitoba's environment for the benefit of current and future generations.

Sincerely,

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