

Sent by e-mail to: buildingcode.advisorybody@ontario.ca

September 15, 2026

Leo Grellette
Chair, Building Code Short-Term Advisory Body
Building and Development Branch
12th Floor, 777 Bay Street
Toronto, Ontario
M7A 2J3

Dear Mr. Grellette,

The Ontario Building Code (OBC) review comes during a generational initiative to build the homes and economic hubs Ontario needs to address rising homelessness and economic pressures. The Association of Municipalities of Ontario (AMO) supports efforts to create greater consistency and remove duplicative requirements that add time, cost and complexity to construction. These changes can help communities meet their growth goals.

AMO has supported previous efforts to streamline the OBC including harmonization with the National Construction Codes (NCC). Greater alignment can make building faster, easier, and more affordable while helping building officials review, approve and inspect projects more efficiently. We support reducing unnecessary duplication and differences between the OBC and NCC while maintaining requirements that address Ontario's unique needs.

At the same time, municipalities are concerned that recent legislation removed the ability to use local development standards to manage growth-related demand on limited energy and utility systems without sufficiently addressing this issue at the provincial level. Sustainable, energy efficient building design can reduce this demand while improving reliability and affordability for residents. Reduced demand also makes sure more energy is available for other uses like additional homes or economic development. The province's own integrated energy plan, *Energy for Generations*, states that "reducing energy use is one of the most cost-effective and immediate ways to meet Ontario's growing energy needs". While energy efficiency systems and building methods may increase the one-time construction cost, they also reduce ongoing energy costs. Reducing this key cost improves affordability for homeowners, tenants, and businesses in the long-run. For these reasons, AMO continues to recommend that the OBC include strong energy efficiency standards.

As you weigh opportunities to standardize and streamline the OBC, we encourage you to consider technical advice from municipal building officials and associations like the Ontario Building Official's Association (OBOA) and the Ontario Large Municipal Chief Building Officials (OLMCBO). Their expertise can help achieve the right balance between streamlining, harmonization, and identify Ontario-specific requirements.

AMO is pleased to support this review and looks forward to working with the province, municipal officials, and the development sector to deliver housing and economic growth to our communities.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Brockington'.

Riley Brockington
AMO President
Councillor, City of Ottawa

cc: The Honourable Rob Flack, Minister of Municipal Affairs and Housing
Martha Greenberg, Deputy Minister, Ministry of Municipal Affairs and Housing
David McLean, Assistant Deputy Minister, Housing Policy and Planning Division