



**Ontario**  
Home Builders'  
Association

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Ministry of Municipal Affairs and Housing  
Building and Development Branch  
777 Bay Street, 12<sup>TH</sup> Floor  
Toronto, ON, M7A 2J3

**Proposal Number: ERO # 019-6847**

**RE: Proposed Building Code Act, 1992 Change for Unorganized Territories**

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario. OHBA represents over 4,000 members including builders, developers, professional renovators, trade contractors and many others within the residential construction sector. The OHBA is coordinating our public policy response with regards to Bill 97, the *Helping Homebuyers, Protecting Tenants Act, 2023* with input from members across Ontario. OHBA is proudly affiliated with 27 local chapter HBAs from across the province and are coordinating our responses accordingly.

Stable enforcement of building code standards across Ontario is important to professional home builders, home buyers and building officials. Providing more flexible options to enforce building codes standards in unorganized territories of the province will help bolster the scope of municipal services associations. Furthermore, it will help ensure a linear approach to building code enforcement, better protect occupants and build increased confidence in the integrity of provincial building code standards. OHBA supports the proposed code change.

Also, by providing a reliable and consistent standard, adoption of this change will enable our sector to accelerate the delivery of modular housing structure, increase housing supply and provide housing solutions to families with greater certainty on costs and delivery timelines.

We thank the Ministry for the opportunity to comment on these proposals. We also recognize that there is still more work to do and OHBA as a critical housing stakeholder in the housing sector may provide further comments at a later date. We look forward to continuing engaging with the Ministry in order to ensure these proposals are aligned with the goals of improving housing attainability.