



4 MAY 2023

[VIA Electronic Submission](#)

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

Proposal Number: ERO # 019-6847

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

The Waterloo Region Home Builders Association (WRHBA) is over 160 members strong! We are the recognized leaders and the voice of the new residential home construction, land development, and professional renovation industries in the Waterloo Region. We are an association of knowledgeable, trusted, resourceful, and local professionals, and together we create vibrant, thriving, and sustainable communities across our three municipalities and four townships. WRHBA member companies construct over 90% of all new residential construction, making it one of the most significant economic engines driving the Region's economy, creating over 22,000 jobs, 1.5 billion in wages, and 3 billion in investment value.

As an Association, we are invested in bringing insight to public policy decision-makers at all levels of government on matters that affect the residential development and construction industry in addressing housing affordability and choice for consumers. The WRHBA is coordinating its public policy response with regards to Bill 97, the *Helping Homebuyers Protecting Tenants Act, 2023* with input from members across Ontario. WRHBA is proudly affiliated with the Ontario Home Builders' Association and other chapters across Ontario.

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. We support the proposed code change.

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 making this consultation available

Sincerely,

WATERLOO REGION HOME BUILDERS' ASSOCIATION

Executive Officer

cc: WRHBA Board of Directors
WRHBA Municipal Liaison Chairs
WRHBA Member Companies