

Stakeholder Consultation Report

Alterations to Existing Buildings Project

Fall 2019



BRITISH
COLUMBIA

Project Background

THE BUILDING AND SAFETY STANDARDS

BRANCH (BSSB), Ministry of Municipal Affairs and Housing, is responsible for the *Building Act* and the *BC Building Code (BCBC)*. The BCBC regulates health and safety, fire and structural protection, accessibility, as well as energy and water efficiency in building construction.

The BCBC is primarily intended for new construction and was not designed specifically to address existing buildings. This means that currently there are no clear requirements for existing building alterations or existing building performance. This lack of clarity has led to confusion and uncertainty as well as inconsistent code enforcement across the province. These factors create barriers to investment in the existing building stock.



However, this also means that existing buildings present a significant opportunity to reduce carbon emissions and enhance resilience in the built environment. 70 per cent of today's building stock will still exist in 2030. As these buildings age and are altered, clear requirements will help ensure that

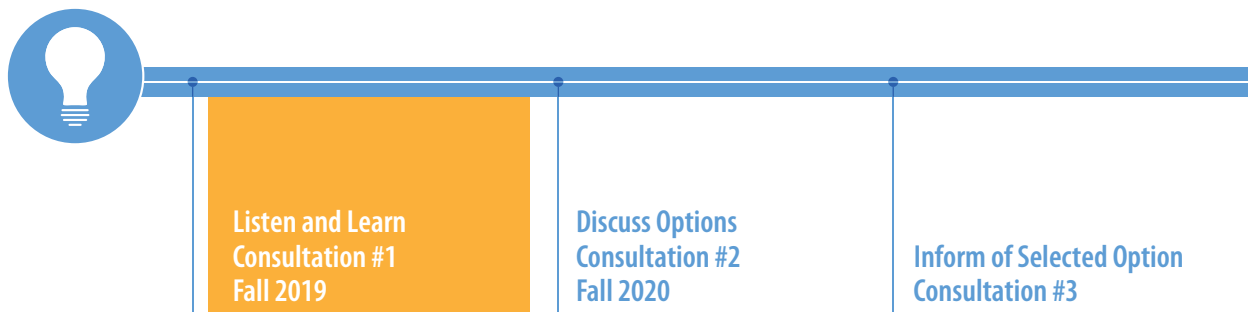
buildings positively contribute to public safety, community resilience, and environmental protection.



As part of the Province's commitment to Better Buildings under CleanBC, BSSB is responsible for the development of an alterations code for existing buildings. This mandate aligns with the federal government's commitment under the Pan-Canadian Framework on Clean Growth and Climate Change to create a code for existing buildings. In addition to working closely with the National Code Development system towards this goal, BSSB will also develop technical requirements to support GHG reduction, energy efficiency, and resilience in existing buildings. To deliver on its mandate, BSSB will develop an alterations to existing buildings strategy and will adopt a code by 2024.

Our Consultation Approach: Listen and Learn

BSSB UNDERTOOK AN INITIAL PHASE OF CONSULTATION between October and December 2019 to inform stakeholders of the project, build relationships, develop an understanding of challenges and opportunities, as well as document stakeholder values and policy preferences. The approach was designed to ensure that key issues for stakeholders are considered throughout policy development to align policy direction, as much as possible, with stakeholder interests. Future consultation phases will seek feedback once options are developed and inform stakeholders of next steps.



Twenty-seven organizations across five sectors participated in the initial consultation phase. Sectors included building owners, renovation professionals, local government professionals, non-government research and advocacy organizations, and energy utility companies. Meetings were held in-person and by teleconference.

Building Owners	Renovation Professionals	Local Government	Non-Government Organizations	Energy Utilities
<ul style="list-style-type: none"> » BC Housing » BC Non-Profit Housing Association » Co-operative Housing Federation of BC » Landlord BC » Building Owners and Managers Association » Condominium Homeowners Association of BC » Urban Development Institute 	<ul style="list-style-type: none"> » Architectural Institute of BC » Engineers and Geoscientists of BC » Interior Designers of BC » BC Construction Association » Vancouver Island Construction Association » Southern Interior Construction Association » Canadian Home Builders BC » Canadian Home Builders Vancouver Island » Canadian Home Builders Northern BC 	<ul style="list-style-type: none"> » City of Surrey » City of Victoria » City of Vancouver » Building Officials Association of BC » Union of BC Municipalities » Planning Institute of BC 	<ul style="list-style-type: none"> » Heritage BC » Canadian Green Building Council » Pembina Institute 	<ul style="list-style-type: none"> » BC Hydro » FortisBC

Consultation questions were tailored to the unique perspectives and expertise of each stakeholder group. All groups were asked about the values and principles they would like to see reflected in future existing building requirements and policies. Other topics included motivations and barriers to investment in existing buildings, market demand and industry capacity for renovations, interpretation and enforcement of the building code, the building permitting system, future capacity building needs, code requirements and triggers, and preferences for future engagement.

The following is a high-level summary capturing themes, principles, and issues consistently raised across all or most stakeholder groups. Unique contributions of individual groups were captured during the consultation and will be considered but may not be reflected here.

Code Requirements and Enforcement

CLARITY AND CONSISTENCY

Stakeholders reported that a lack of clarity in the BC Building Code creates a barrier to consistent interpretation and enforcement by local governments. Stakeholders also reported that inconsistent local government enforcement practices and the building permitting system create barriers, uncertainty, and risk for building owners and renovation professionals. Stakeholders suggested opportunities for improvement.

THREE KEY ISSUES RELATED TO CLARITY AND CONSISTENCY WERE RAISED:

- **Clarity of Requirements:** Stakeholders requested that requirements be clarified. Suggestions included creating a separated code section which consolidates requirements for existing buildings, introducing performance metrics, and other measures.

- **Consistent Interpretation of Requirements:** Stakeholder requested tools that would help guide interpretation and decrease the use of discretion by code users. Suggestions included a decision-making framework, a hierarchy of code objectives, performance metrics, and a menu-based system of options.

- **Consistent Enforcement Across Local Governments:** Stakeholders requested that actions be taken to standardize the code enforcement system across the province in order to decrease uncertainty and enhance industry mobility. Suggestions included standardized building bylaws, standardized permitting forms and processes, enhanced data collection and processing capabilities for local governments, and other measures.

PRACTICALITY AND FLEXIBILITY

Stakeholders reported that future requirements should consider the unique characteristics of existing buildings and existing buildings stakeholders.

TWO KEY ISSUES RELATED TO PRACTICALITY AND FLEXIBILITY WERE RAISED:

- **Flexible, Practical Technical Requirements:** Stakeholders requested that requirements reflect the variability in the existing building stock. Suggestions included performance-based requirements developed using real existing building data, alternative compliance paths, and different approaches for different building types.
- **Options and Choice to Building Owners:** Stakeholders requested that building owners have enough flexibility to make the decisions most suitable for their unique building and circumstance. Building owners requested that requirements provide the sector with alternatives and adequate timelines.

ACHIEVING OBJECTIVES

Stakeholders reported that future requirements will need to balance the desire for flexibility with the need for clear standards if real progress is to be made on existing buildings.

THREE KEY ISSUES RELATED TO ACHIEVING OBJECTIVES WERE RAISED:

- **Minimum Standards:** Stakeholders requested clear minimum standards and expressed concern that, without these, existing buildings would continue to under perform, and local governments would struggle with code enforcement.
- **Evidence Based Targets:** Stakeholders requested both energy and GHG targets be developed for existing buildings to support efficiency and emissions reduction goals. Stakeholders suggested that evidence-based targets would support clarity, transparency, and confidence in existing buildings standards.
- **Performance Monitoring:** Stakeholders requested that building performance be monitored over time to improve transparency of building emissions and enable progress tracking toward energy and GHG targets. Stakeholders suggested benchmarking and data access would also support the refinement of targets and policies, if needed.

Implementation of New Requirements

THREE KEY ISSUES RELATED TO IMPLEMENTATION WERE RAISED:

- **Advanced Notice:** Stakeholders requested early notice of future requirements and clear, adequate timelines be provided to help individuals and businesses prepare for the transition.
- **Phased Approach:** Stakeholders requested a phased approach to implementation, with a basic introductory phase designed specifically

to build capacity across sectors. Stakeholders suggested this would help support individuals and businesses adjust to the changing regulatory environment.

- **Capacity Building:** Stakeholders reported that new requirements for existing buildings may trigger the need for enhanced capacity in the areas of energy advisors, building officials, and qualified professional renovators. Stakeholders suggested education, professional programs, and ongoing communication with industry would help build capacity in these areas.

Incentives and Financing

Stakeholders reported that, while cost is a barrier to investment in existing buildings, it is important to make investments for many business, environmental, and social reasons. Stakeholders requested that government work to coordinate incentives and financing to support building owners in the transition to existing building requirements.

THREE KEY ISSUES RELATED TO INCENTIVES AND FINANCING WERE RAISED:

- **Coordinated:** Stakeholders reported that incentive and financing programs will be most effective at supporting the transition to new existing building requirements if they are closely coordinated with regulation or even tied to meeting new requirements. Stakeholders suggested that BSSB work closely with utility incentive providers and incentive programs in other areas of government.
- **Targeted and Relevant:** Stakeholders reported that incentive and financing programs will be most effective if they are targeted at solving issues relevant to existing building owners. Stakeholders suggested that incentives should reflect the needs of today's building stock and the interests of building owners.
- **Simple:** Stakeholders reported that incentive and financing programs will be most effective if they are simple, straightforward, and easy to access.

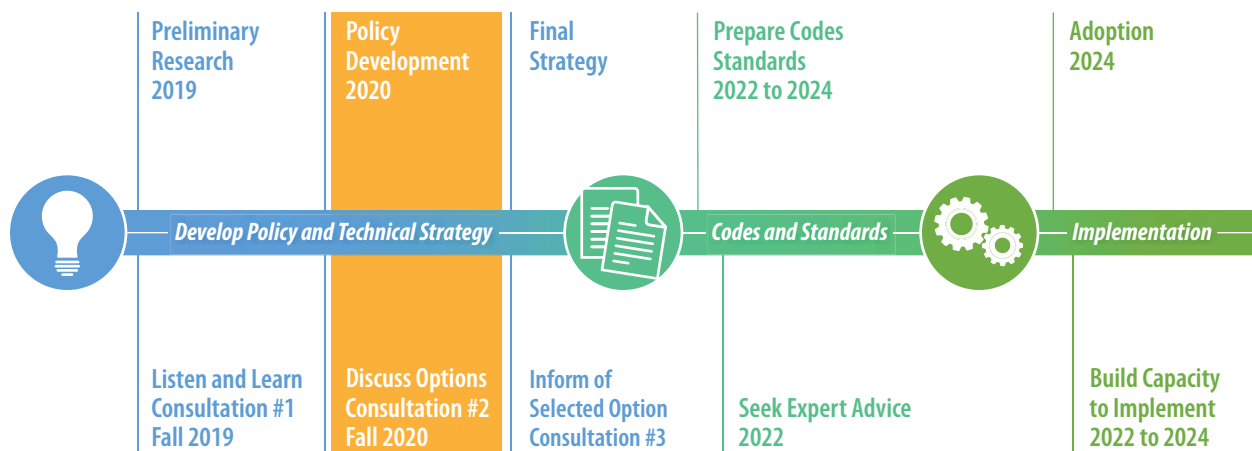
Next Steps

Development of Policy Options: Spring/Summer 2020

In 2020, BSSB will develop policy options that will support a future alterations code for existing buildings.

Phase 2 Consultation: Discuss Policy Options – Fall 2020

The second phase of consultation will be used to seek input from stakeholders on policy options. The desired outcome of this phase is that stakeholders and BSSB develop a shared understanding of options, policy trade offs, and policy preferences.





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