



MANITOBA ECO-NETWORK

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June 26, 2023

Hon. Jon Reyes
Minister of Labour and Immigration
minaesi@leg.gov.mb.ca

Re: Adoption of the 2020 National Model Codes

Dear Minister Reyes,

The Manitoba Eco-Network is pleased the Government of Manitoba is moving ahead with the adoption of the 2020 national model codes. As the Minister responsible for implementation and enforcement of these codes, we recommend you support the adoption of the highest standards available under the new regulatory scheme. For example, the Eco-Network is strongly in favour of requiring Tier 2 or 3 standards for residential buildings and ensuring energy efficiency measures are emphasized. This is important in terms of minimizing environmental impacts and fulfilling climate commitments but will also save Manitobans money in the long run and avoid costly future upgrades.

Reducing Environmental Impacts:

As we transition towards a more sustainable way of living, it is important that we have high building standards in Manitoba. Buildings account for a significant portion of global energy consumption and greenhouse gas emissions. Requiring the construction of energy-efficient buildings can help reduce the energy demand and carbon footprint associated with buildings. Improving energy efficiency will also reduce the amount of natural gas required for heating, and the amount of electricity required for cooling. By implementing regulatory standards that incorporate energy-efficient design principles, such as insulation, efficient HVAC systems, and renewable energy technologies, the Government of Manitoba will ensure buildings consume less energy, have less environmental impacts, and contribute less to the climate crisis.

Ensuring a high standard of energy efficiency is required will also help building owners 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.

Efficient Use of Energy Resources:

Building standards that require energy efficiency measures can also help optimize the use of existing resources. By lowering overall electricity demand, Manitoba's electrical grid can operate more efficiently and effectively. This creates the opportunity for better integration of renewable energy sources, such as wind or solar, into the grid. Reducing energy consumption also minimizes the need for costly infrastructure expansions (like new hydroelectric dams) and can result in cost savings for both utilities and consumers.

Fulfilling Climate Commitments:

There is an urgent need to adopt more sustainable and energy efficiency building codes in Manitoba. This includes new energy efficiency tiers, which play a crucial role in helping municipalities in Manitoba achieve their climate targets. Energy efficiency tiers promote sustainable development and reduce greenhouse gas emissions in buildings.

However, based on the commentary in the Manitoba Regulatory Consultation Portal regarding the adoption of the new codes, it seems that “Tier 1 for residential/small buildings would not represent a notable energy efficiency improvement.” This means that we should not be starting with minimum requirements, like Tier 1 standards for residential buildings. Defaulting to start at Tier 1 will also add months or years onto the timeline for Manitoba to get to net zero. Manitoba is ready for Tier 2 residential standards so we should start there so we can more quickly get to net zero buildings.

Meaningful Public Engagement/Collaboration:

As the Government of Manitoba implements the new 2020 Building Codes, it is important that a collaborative approach, involving diverse stakeholders, is taken. Collaboration is crucial for effective implementation of energy efficiency initiatives. To help Manitobans easily transition to higher standards, a task force with clear terms of reference and transparent actions could be established. However, the creation of the task force should not delay the adoption of higher standards, like tier 2 or 3 for residential buildings, at the start of the new code implementation.

The task force’s mandate can include developing a plan to progress quickly to higher tiers and supporting the implementation of these new standards, including public education initiatives. Secretariat support from the province's Chief Building Official would also be helpful to facilitate smooth operations and coordination between different stakeholders and decision-makers. We all have a role to play in the implementation of more sustainable building standards, and there are a diverse range of Manitobans that deserve to have a voice in the adoption process.

Overall, the Manitoba Eco-Network believes that adopting energy-efficient building codes is essential for mitigating climate change, reducing energy consumption, improving occupant comfort and health, fostering innovation, and achieving long-term economic and environmental sustainability. We support the adoption of the new 2020 building codes in a way that will set a high standard for energy efficiency and other important environmental considerations. Regulatory measures that require energy efficient buildings will support a sustainable energy future for Manitoba by reducing environmental impacts, such as greenhouse gas emissions, enhancing grid resilience, and promoting the responsible use of energy resources.

We welcome future opportunities to engage with the Government of Manitoba to ensure the implementation of new legal and policy measures support sustainable development and the protection of Manitoba’s environment for the benefit of current and future generations.

Sincerely,

Patricia Fitzpatrick, Ph.D.
Policy Committee Chair

Heather M. Fast, J.D., LL.M.
Policy Advocacy Director