

The Honourable Minister Jonathan Wilkinson
Natural Resources Canada
nrcan.minister-ministre.rncan@canada.ca

May 25, 2023

Re: The Canada Green Buildings Strategy

Dear Minister Wilkinson,

Through the Canada Green Buildings Strategy, the Government of Canada has a vital opportunity to make a significant impact on Canada's progress towards net-zero goals. We applaud the consultation process Natural Resources Canada undertook to obtain and consider the diverse perspectives and impacts the strategy may have. We, as a group of invested organizations, want to take the opportunity to reiterate critical feedback points.

1. Now is the time to make bold and significant moves to decarbonize buildings.

In recent meetings between energy and efficiency sector stakeholders and the federal government, including NRCan, we have repeatedly stated that we are ready to work collaboratively with the government to develop regulations. Canada is falling behind on its Pan-Canadian Framework measures, and a dramatic increase in retrofit rates, from 1% to 3-5%, is required to reduce GHG emissions.

In order for Canada to meet its net-zero commitments, regulations must include time-bound commitments for net-zero emissions and energy efficiency standards, as well as when heating systems must be zero carbon or zero carbon ready.

2. Industry is ready to support the transition and ready to work together with the Government of Canada to scale up workforce development of skilled trades.

In response to strong policy signals and changing consumer demands, the energy efficiency sector has developed the support necessary for workers and companies to make the transition happen. The sector is already committed to meeting Canada's emission reductions goals, and through the existing entry points, courses and training, apprentice subsidies, career mentoring and job opportunities, the sector is prepared to grow and meet the demand. We are ready to scale up to support Canadians who choose skilled trades, and ready to work together with the government to continue driving Canadians to choose skilled trades as a career. Students, minority groups, new-Canadians and transitioning workers should continue to be a priority.

Furthermore, with a strong Canada Green Buildings Strategy, sustainable, long-term positions supporting the energy transition will exist for apprentices and new hires to move into the sector, which is critical to sector and apprentice retention.

3. The Government of Canada must work in concert with provincial, municipal and Indigenous governments to make the Canada Green Buildings Strategy effective.

Harmonized regulations and programs will allow for not only a more prepared implementation, but also faster delivery by manufacturers and contractors, and a more educated consumer base. Awareness and cooperation amongst levels of government, and the provision of appropriate

supports to help transition and adoption will significantly enhance delivery of the Canada Green Buildings Strategy, and any subsequent regulations. When combined with closer collaboration with government, industry, and the manufacturing segment, this will save time and money in delivering products and services, getting Canada to its goal faster.

4. The Canada Green Buildings Strategy cannot leave any Canadian behind.

Without a strategy to support low-income Canadians, Canada will not achieve net-zero emissions. Existing programs constitute significant barriers to entry for low-income Canadians, and without a fundamental shift in program provision, they will continue to be locked out of the required retrofits to meet our goals. Low-income family dwellings tend to account for a significantly higher proportion of emissions in housing building stock, given their age and affordability. This group of five million Canadians has been largely left out of the energy transition to date, and supporting this vulnerable population is widely supported in Canada. This strategy must also consider the unique characteristics and needs of Indigenous housing.

We encourage you to integrate these recommendations into the final Canada Green Buildings Strategy. The many components of the green building sector are standing by to work with you to ensure the Government of Canada reaches its net-zero target.

Signed by:

Building Owners and Managers Association (BOMA) Canada

Canada Green Building Council (CaGBC)

Canadian Institute of Plumbing and Heating (CIPH)

Cellulose Insulation Manufacturers Association (CIMA)

Efficiency Canada

Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI)

International Association of Heat and Frost Insulators & Allied Workers (IAHFAW)

Mechanical Contractors Association of Canada (MCAC)

North American Insulation Manufacturers Association (NAIMA) Canada

Siding and Windows Dealers Association of Canada (SAWDAC)

cc:

The Honourable Steven Guilbeault
Minister of Environment and Climate Change
ec.ministre-minister.ec@canada.ca

The Honourable Carla Qualtrough
Minister of Employment, Workforce Development and Disability Inclusion
carla.qualtrough@parl.gc.ca

The Honourable Seamus O'Regan Jr.

Minister of Labour

MinistrePT-LPMinister@labour-travail.gc.ca

The Honourable Dominic LeBlanc

Minister of Intergovernmental Affairs, Infrastructure and Communities

iga.minister-ministre.aig@pco-bcp.gc.ca