

1. Introduction and Background

An independent, time-limited Advisory Body

The Building Code Short-Term Advisory Body (“Advisory Body”) was established in June 2026 to provide independent, expert advice to the Minister of Municipal Affairs and Housing on broad and meaningful improvements to the Ontario Building Code. In the context of Ontario’s housing crisis and the need to accelerate homebuilding, the Advisory Body will conduct a detailed review of the Building Code to identify opportunities to reduce unnecessary complexity, delays, and costs that can hinder construction. Its work reflects the government’s commitment to leave no stone unturned in finding practical ways to streamline requirements and support more efficient building, while continuing to uphold foundational standards for health, safety, accessibility, energy efficiency, and performance.

Who Are We?

- **Leo Grellette, Chair**

Leo Grellette brings extensive municipal building and regulatory experience. He previously served as Chief Building Official for the City of Vaughan and is currently Chair of the Building Materials Evaluation Commission. He has also served as President of the Ontario Building Officials Association and the Canadian Fire Safety Association.

- **Paul De Berardis, Member**

Paul De Berardis is a civil engineer and the VP of Building Standards and Engineering with RESCON, with a focus on technical and regulatory barriers affecting residential development and construction.

- **Michael Seiling, Member**

Michael Seiling is the Chief Building Official for the City of Kitchener, with senior municipal leadership experience in Building Code administration and customer-focused building services. He is also a past President of the Ontario Building Officials Association.

- **Stephen Wong, Member**

Stephen Wong is a Professional Engineer and current Chair of the Building Code Commission. He has senior municipal experience in Building Code administration as Deputy Building Commissioner and Deputy Chief Building Official in the former City of Etobicoke.

- **Douglas Tarry, Member**

Douglas Tarry is a homebuilder from St. Thomas, Ontario with a strong focus on energy efficiency, innovation, and high-performance housing, with expertise in how Code requirements affect residential construction in practice.

What the Advisory Body has been asked to do

The Advisory Body has been asked to undertake a comprehensive, section-by-section review of Ontario's Building Code to identify opportunities to reduce unnecessary regulatory burden. This includes examining whether some requirements may have become outdated, duplicative, unclear, overly prescriptive, or unnecessarily difficult to apply in practice. It also includes considering whether the Building Code can be made easier to understand, more practical to use, and more efficient to implement, including in ways that may better support innovation and more efficient construction activity.

This review is being undertaken within a public-interest and safety-focused framework. The Building Code plays a central role in supporting health and safety, accessibility, and building performance. The Advisory Body's task is to consider whether unnecessary burden can be reduced while maintaining or improving the safety and quality of buildings in Ontario.

The Advisory Body has been asked to consider the Building Code as a system, including how its technical, administrative, and Ontario-specific provisions work together in practice. It may also consider whether some issues are better addressed through tools other than direct Building Code regulation, such as improved guidance, reference standards, or changes to administration or implementation practices.

Why this consultation paper is being issued

This consultation paper is being issued early in the Advisory Body's mandate so that stakeholders, practitioners, and members of the public can provide input to inform the development of interim and final advice. While the Advisory Body is made up of experts with lived experience and subject matter expertise, we are aware that the scope of the Building Code will require informed input from a wider range of stakeholders who bring their own experience, challenges and suggestions for improvement. We truly value the opportunity to seek input to ensure our advice is practical, effective and implementable.

The Advisory Body's work is expected to proceed in stages. This consultation paper is the first step. Input received through this process will help inform an Interim Report to the Minister in September 2026, which is expected to identify preliminary observations, emerging directions,

and possible early actions, and a Final Report in March 2027 with the Advisory Body's complete recommendations.

2. Context: Ontario's Building Code and the Challenge Ahead

Ontario's Building Code as a public-interest regulation

Ontario's Building Code is one of the province's most important and utilized public-interest regulations. It sets minimum requirements for how buildings are designed and constructed in order to support health and safety, accessibility, structural sufficiency, durability, energy efficiency, and building performance. In doing so, it also helps provide public confidence in the quality of construction across Ontario.

The Building Code applies throughout the province as a single regulatory framework for the construction and renovation of buildings. It also addresses related matters such as demolition, changes of use, and the maintenance and operation of small on-site sewage systems. In broad terms, it is intended to provide clear and uniform standards while allowing for a wide range of building types, project scales, and construction approaches.

Ontario's Building Code compendium, meaning the documents that make up the Building Code, is organized in Divisions A, B, and C, supported by Supplementary Standards and Appendices. Division A sets out the framework for compliance, including objectives, functional statements, application, and defined terms. Division B contains most of the technical requirements used to demonstrate compliance, including Ontario-specific amendments. Division C contains administrative requirements.

A mature and evolving system

Ontario's Building Code has evolved over many years since its conception in 1975. Since then, there have been ongoing amendments, modernization, and response to emerging issues. Construction methods change, new products and building systems enter the market, policy priorities develop, and experience from implementation helps show where change may be needed. The Building Code also operates alongside applicable law provisions, which connect the permitting process to a broader set of legal requirements beyond the Code itself. Despite this, there has never been a full-scale review of the Building Code to ensure years of amendment have not inadvertently led to unnecessary burden or cost escalation.

Government has heard that the cumulative effect has led to a regulatory framework that is longer, more technical, and more difficult to navigate. As with other mature regulatory systems,

there can be value in stepping back to examine whether the Building Code remains as clear, practical, and efficient as it could be.

How the Building Code works in practice

The Building Code shapes the day-to-day work of designers, builders, manufacturers, municipal building officials, and others involved in approvals and construction. It affects how buildings are designed, reviewed, approved, and constructed, and it influences timelines, documentation, and consistency of implementation across Ontario. At the same time, the Building Code provides a framework for compliance rather than a construction design manual.

In practice, the Building Code works alongside referenced standards, professional judgment, alternative solutions, administrative practices, inspections, and enforcement. This means that burden may arise not only from the wording of a requirement, but also from how different parts of the system are interpreted and work together. These are the kinds of issues the Advisory Body has been asked to examine.

The challenge ahead

Concerns have been raised over time about whether parts of the Building Code, or the way it is applied in practice, may be creating unnecessary burden. As Ontario faces a housing crisis alongside escalating costs across the construction ecosystem, trade challenges, and other economic challenges, concerns regarding the Building Code's complexity are more pronounced than ever. These include concerns about duplication, prescriptiveness, administrative burden, clarity, consistency, and barriers to innovation or more efficient construction approaches.

The Advisory Body is not treating these concerns as findings. Its task is to test them through evidence, engagement, and practical experience. Some issues may prove to be widespread and significant. Others may be narrower, more context-specific, or better addressed through tools other than Building Code amendment.

The challenge for the Advisory Body is therefore to identify where burden is actually arising, how significant it is, who it affects, and what type of response may be most appropriate.

3. Guiding Principles for the STAB's Work

This review will be guided by a set of core principles intended to clarify both scope and expectations, and to support a disciplined approach to identifying opportunities to reduce unnecessary burden.

An advisory role, not a decision-making role

The Advisory Body does not have authority to amend the Building Code. Its role is to review the Building Code, hear from those who use and apply it, and provide advice and recommendations to the Minister. Any changes to the Building Code, or its associated legislative framework, would be a decision of government following our review.

The review is focused on broader Building Code issues and opportunities for improvement across the system, rather than individual disputes, enforcement matters, or product-specific approval questions.

Public-interest focus

The Advisory Body's work will be guided by the broader public interest. Members serve in an individual capacity and are expected to use their expertise to provide impartial advice to government. Recommendations will need to consider system-level impacts, implementation realities, and how the Building Code functions across Ontario as a whole.

Health safety, accessibility, and performance first

Burden reduction will be examined within a public-interest framework and is not intended to weaken the Building Code's core purposes. Health and safety, accessibility, energy efficiency, and building performance remain foundational objectives.

Evidence-based and practical

The Advisory Body's work will be evidence-based and practical. It will consider recurring issues, implementation experience, and whether proposed changes are feasible, implementable, and likely to lead to meaningful improvement in practice and real burden reduction.

Proposed changes will need to be tested against real-world conditions. A proposal that appears attractive in principle may not be a good solution if it creates new uncertainty, is difficult to interpret or enforce, or shifts burdens elsewhere in the system.

A system-level perspective

The Advisory Body will examine the Building Code as a system, not as a list of individual provisions. This matters because we are looking for burden that arises from how the Building Code operates as a whole, not from any one provision in isolation. Our role is not to advocate

for specific products, types of products or specific project-specific issues. We must consider how the Code, its provisions and its administration operate at a system-wide level.

Informed by Building Code users

The Advisory Body's analysis will be informed by broad input and engagement. This consultation paper is an early step in that process, and the Advisory Body's advice will be strengthened by the practical evidence and range of perspectives provided by those who use, apply, interpret, enforce, or are affected by the Building Code.

Ontario context

The Advisory Body's work will be grounded in Ontario's circumstances, while also recognizing that issues such as trade, labour mobility, and harmonization with national approaches may be relevant in some areas. These issues will need to be considered against _ Ontario's priorities, challenges, implementation realities, and the broader purposes of the review, namely burden and cost reduction.

Taken together, these principles are intended to support a review that is balanced, evidence-based, and focused on meaningful improvement.

4. Why Now?

With housing affordability under pressure and construction costs and delays continuing to slow the pace of new homebuilding, this is a critical moment to take a closer look at the rules that shape how buildings are designed and delivered across Ontario. The Building Code plays a central role in enabling—or constraining—efficient construction, and a thorough review provides an opportunity to identify requirements that may be outdated, overly complex, or adding unnecessary burden. By examining the Code in a structured, evidence-based way, the Advisory Body can help pinpoint practical changes that make it faster and more cost-effective to build, while continuing to protect health, safety, accessibility, and performance. In this context, the review is a key step in supporting the province's broader effort to accelerate housing supply and address barriers that may be _ contributing to the housing crisis.

National code change and harmonization context

This review is taking place in the context of Ontario's commitments under the 2020 Construction Codes Reconciliation Agreement, which aims to promote harmonization between the National Construction Codes and provincial and territorial codes. It is also timely with the release of the 2025 National Construction Code. This creates an opportunity to examine the

extent to which alignment with national approaches may support burden reduction through improved interprovincial labour mobility, trade and investment opportunities. It also provides opportunities to identify where Ontario-specific deviations may be justified and important at the provincial level.

Taken together, these factors make this the right time for review. Ontario needs a Building Code that continues to protect the public interest while also being clear, practical, and supportive of housing delivery. This review provides an opportunity to modernize and simplify where appropriate, improve usability and predictability, and ensure the Building Code continues to serve Ontario effectively without compromising the outcomes that matter most.

5. Identifying Key Pain Points and Areas of Focus

Areas where burden may be increasing

One area of focus is whether some requirements may be more prescriptive than necessary, particularly where the same outcomes could be achieved through more flexible approaches. Another is whether some requirements may have become duplicative or unnecessarily difficult to navigate over time.

The Advisory Body is interested in perspectives on whether parts of the Building Code are now outdated, unclear, overly complex, infrequently used, or otherwise difficult to apply. It is also considering whether administrative or procedural requirements may be creating delay, uncertainty, or added burden without providing a clear benefit.

6. Consultation Questions

The questions below are intended to help focus input on the issues where the Advisory Body is seeking the most assistance. Respondents do not need to answer every question and should focus on the areas most relevant to their experience. If there are other critical issues, we should be aware of, we encourage respondents to highlight those for our awareness and consideration.

In responding, participants are encouraged to keep in mind that health, safety, accessibility, performance and broader public-interest outcomes remain foundational to this review. As noted above, the Advisory Body is interested in real burden reduction, not simply shifting costs, risks, or uncertainty from one part of the system to another. In some cases, this will require a broader view of impacts, including not only upfront costs, but also effects on design complexity, approvals, construction timing, operating costs, maintenance, and long-term performance.

Submissions should, to the degree possible, be specific, practical, and grounded in real-world experience. Where possible, respondents should identify the relevant Building Code provision, section, topic, or type of requirement, explain how the issue arises in practice, describe who is affected, and indicate whether the issue appears to be recurring or more limited in scope. Examples, evidence, and practical suggestions are greatly appreciated.

Usability, complexity, and modernization

1. Where do Building Code requirements create unnecessary complexity, uncertainty, or difficulty in practice without improving outcomes?
2. Are there specific areas where requirements could be simplified, clarified, consolidated, or applied more flexibly while maintaining health, safety, accessibility, durability, performance, and enforceability outcomes?
3. Are there parts of the Building Code that appear outdated, overly prescriptive, duplicative, or are no longer the clearest or most practical way to achieve their intended purpose?

Implementation, administration, and consistency

4. Which administrative requirements or implementation issues have the greatest effect on timelines, predictability, consistency, cost, or ease of compliance?
5. Are there areas where interpretation, professional judgment, or enforcement challenges create inconsistencies across projects, sectors, or municipalities? Do you have suggestions for remedying these?

Ontario-specific requirements and national alignment

6. Where does alignment – or lack of alignment - with national codes create unnecessary burden? Are there areas where Ontario-specific requirements remain justified?

Innovation and more efficient building practices

7. Are there barriers in the current system to innovation, alternative solutions, new materials, new methods of construction, digital tools, or more efficient building practices? If so, where do those barriers arise, and what change might help address them?
8. Are there specific issues related to energy efficiency requirements that should be explored? Are there barriers to meeting current requirements? Should consideration be

given to either enhancing or simplifying the current requirements? If so, to what degree should Ontario consider the current National Code's approach in utilizing a Tiered Energy Performance Framework and compliance paths?

What is outside scope

This review is broad, but it is not unlimited. The Advisory Body is not being asked to review individual permit disputes, project-specific enforcement matters, appeals, or broader planning and development approval issues, except where a concern directly relates to the Building Code or its applicable law provisions.

As noted earlier, this Advisory Body will be offering systemic advice to the Minister for consideration. The review does not replace the Ministry of Municipal Affairs and Housing's (MMAH) [Building Code change request](#) and innovative building materials evaluation approval processes.

7. How Input Will Be Used and Next Steps

How input will be used

The Advisory Body will consider all input received through this consultation as it undertakes its review of Ontario's Building Code. The Advisory Body will not provide a response to individual or group submissions. Please note: the Advisory Body is bound to follow the requirements set out in the [Freedom of Information and Protection of Privacy Act \(FIPPA\)](#), including the collection, retention, security, use, distribution, disclosure, access and correction and disposal of records, which responses provided may be subject to.

Further engagement

This consultation paper is one step in a broader engagement process. During and after the formal consultation period, the Advisory Body expects to continue engaging with stakeholders through targeted discussions, broader outreach over the summer, and focused technical sessions or roundtables where appropriate.

Interim and final advice

Input received through this consultation will help inform the Advisory Body's interim report in Fall 2026. That report is expected to identify key themes, emerging directions, and areas where further work may be needed.

The consultation will also help validate early observations, identify implementation considerations, and highlight issues that may require deeper technical review or further consultation before final advice is developed and provided to the Minister.

The Advisory Body appreciates the time and expertise of those who participate in this consultation. Ontario's Building Code affects many different people in different ways, and the quality of this review will be significantly strengthened by the evidence, experience, and practical insight brought forward by a broad range of participants.

The Advisory Body is committed to conducting this review in a fair, impartial, and outcome-focused way. Its goal is to provide practical advice that reflects the evidence, respects the Building Code's public-interest purposes, and helps identify where meaningful improvement may be possible. All those with relevant experience are encouraged to participate.

How to Contact Us

The Advisory Body invites written input from stakeholders and members of the public by email or through the Environmental Registry of Ontario website.

Please send written comments to: buildingcode.advisorybody@ontario.ca or <https://ero.ontario.ca/notice/026-0744>.

Submission deadline: **August 14, 2026**

Please note that submissions may be subject to the **Freedom of Information and Protection of Privacy Act (FIPPA)**.