February 28, 2022

Building and Development Branch
777 Bay Street
2nd floor
Toronto, ON
M5G 2E5

Re: OFIA Supports Proposed Encapsulated Mass Timber Amendment to Ontario Building Code

To whom it may concern,

On behalf of the Ontario Forest Industries Association (OFIA), thank you for the opportunity to comment on ERO posting 019-4974, *Proposed Changes for the Next Edition of Ontario's Building Code (Winter 2022 Consultation)*. These amendments would allow encapsulated mass timber constructions in Ontario of up to 12 storeys high, doubling the allowable height of new encapsulated mass timber buildings in Ontario and allowing for "tall wood" construction. Building with wood is a climate-friendly, grown in Ontario solution that is essential for the growth of Ontario's green economy, and we strongly support this proposal.

Encapsulated mass timber is an incredibly durable building material that has a proven track record over decades of Ontario winters. The current building code limiting new encapsulated mass timber constructions to six stories dates back to 1941, and many higher mass timber constructions that pre-date 1941 are still standing across the province. Encapsulated mass timber has also been shown to be more fire resistant than traditional building materials in several studies, adding to its reputation as a safe choice. Other provinces have already changed their building codes to allow for tall wood buildings – in fact, much taller than the proposed 12 storey limit. British Columbia is home to the tallest mass timber building in the world, the University of British Columbia's Tallwood House dormitory. Without this change, Ontario risks being left behind.

As we work to address the global challenge of climate change, it is vital that we find more climate-friendly building materials. Mass timber is a sustainable and renewable resource that is grown right here in Ontario. Unlike concrete or steel, producing mass timber to use for construction is not a carbon-intensive process. In fact, using mass timber turns the building into a long-term carbon sink. Using it also supports communities across Ontario, and enables the growth of our province's green economy, creating jobs in Ontario from planting seedlings to harvest to construction.

We appreciate the opportunity to review these proposed changes and look forward to the introduction of the new building code, and to a new era for mass timber construction in Ontario.

Sincerely,
Olivia Auriat
Policy Manager
Ontario Forest Industries Association