**March 10, 2022**

**The Mass Timber Institute's Comment on the** Ministry of Municipal Affairs and Housing **(MMAH) Proposed Changes to Ontario's Building Code**

To the Ministry of Municipal Affairs and Housing,

The Mass Timber Institute (MTI) participated in the Phase 2: Winter Consultation, Session 2 on March 1st to learn more about the MMAH's work to identify and amend the discrepancies between the Ontario building code (OBC), and the National Building Code of Canada (NBC). This is a large harmonization undertaking but is necessary to ensure safe and effective building practices moving into the future. The main area that the MTI would like to comment on is encapsulated mass timber construction, as well as fire safety and fire protection systems.

The main change we would like to bring to the attention of the MMAH is code 3.2.2.43A.(2)(e), 3.2.2.50A.(2)(e), and 3.4.4.1.(3). The proposed changes to the OBC will make it necessary to include stairways and exits to be constructed of non-combustible materials such as concrete and/or steel. This will severely detract from the main benefits of mass timber buildings because the inclusion of these components will increase the complexity of the design, construction, and maintenance of the building. Stakeholders have identified this important issue and suggested that these OBC changes be aligned with the NBC.

Other changes that should be considered include codes 3.1.6.9, 3.1.6.10, 3.1.11.7, 3.1.13.12, 3.1.15.2, and 3.1.3.2. These changes pertain to bringing the mass timber construction building codes up to the NBC level to ensure mass timber construction innovation is at the forefront of Ontario's building sector.

The acceleration of changes towards the construction of mid-rise buildings with wood align well with the MMAH's objective to build more housing, including affordable housing. Mass timber can play a beneficial role in the construction of mid-rise housing with respect to assembly processes, environmental sustainability, and aesthetic values. Dr. Ted Kesik's Mass Timber Building Science Primer explains these benefits very well.

Equally important as mass timber construction in new affordable housing developments, is the implementation of more mixed-use, mid-rise developments along transit lines. Such developments will help usher in more transit-oriented communities (TOC's), encouraging people to live, work, and play within their communities. The Future of Infrastructure group has done some great work outlining the steps to realize more transit-oriented communities. Their report outlines the importance of these communities and achieving these goals in Brampton, Toronto, Markham, and Montreal. There is great work being done on transit oriented communities with the importance of these communities having been already identified by the province of Ontario, which can be found here.

Overall, the MTI recognizes the efforts of the MMAH to align the OBC with NBC, their work towards sustainable, and affordable housing and the increasing role of mass timber in Ontario construction.

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