Friday, December 9, 2022

To be sent via email to buildingcode.consultation@ontario.ca and minister.mah@ontario.ca

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
Government of Ontario
16th Floor, 777 Bay St.
Toronto, ON M7A 2J3

Dear Minister Clark,

RE: Proposed Changes to Sewage Systems and Energy Efficiency for the Next Edition of Ontario's Building Code (ERO# 019-6211)

The City of Guelph (the City) welcomes the opportunity to provide comments on the proposed changes affecting the Ontario's Building Code (Sewage Systems and Energy Efficiency). This submission will provide comments from the City's Planning and Building Services perspective.

Overall Comments

Code Change Number	Code Reference	Proposed Code Change	Comments
B-01-03-01	Division B / 1.3.1.2.(1)	Update edition of referenced Standard CSA B66 "Prefabricated Septic Tanks and Sewage Holding Tanks" in Articles 8.2.2.2. and 8.2.2.3.	Support
B-08-04-01	Division B / 8.4.1.2.; 8.4.2.1.; 8.4.2.3.	This proposed code change would allow increased flexibility for the construction of Class 2 greywater systems.	Support
B-08-06-01	Division B / 8.6.1.3.(1.1)	Remove requirement that a distribution pipe be extended through the entire length of the	Support

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		leaching chamber when the total length of leaching chamber is 150 m or more.	
B-08-06-02	Division B / 8.6.2.2.(2)	To address a combined treatment and dispersal bed system in the Code and harmonize its requirements with those of other Class 4 systems by requiring their certification to CAN/BNQ 3680-600.	Support
B-08-07-01	Division B / 8.7.1.2.(1)	To include design and installation competency criteria for combined treatment and dispersal bed systems.	Support
B-08-07-02	Division B / 8.7.2.3.(2)	Expand the use of leaching chamber technology to include "low profile" model products.	Support
B-08-07-03	Division B / 8.7.3.1.A.(2)	Expand the use of leaching chamber technology to include "low profile" model products.	Support
B-08-07-04	Division B / 8.7.3.2.(1)	Expand the use of leaching chamber technology to include "low profile" model products.	Support
B-08-07-05	Division B / 8.7.5.3.(1), (2)	Provide clarity with respect to the installation of distribution piping within filter beds as well as	Support – with comments Recommend change to use the term "mantle" as it's the term commonly used by designers and installers.

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		remove redundant reference to Appendix A.	
B-08-07-06	Division B / 8.7.5.3.(6), (7)	To align Building Code requirements related to extending the contact area or 'mantle' for Class 4 sewage systems.	Support
B-08-07-07	Division B / 8.7.7.1.(4), (5)	To distinguish between the types of material that can be used for the sand layer of Sentence 8.7.7.1.(4) and its extension or 'mantle' prescribed in Sentence 8.7.7.1.(5).	Support
B-08-07-08	Division B / 8.7.7.1.(9)	The proposed change makes the way in which Type A Dispersal Bed horizontal clearance distances are measured consistent with how they are measured for other Class 4 systems.	Support
B-08-07-09	Division B / 8.7.9. (new)	Introduction of combined treatment and dispersal beds systems in the Building Code under new Subsection 8.7.9.	Support
B-08-09-01	Division B / 8.9.2.4.(1)	To include a requirement to take effluent samples for proposed combined treatment and dispersal bed systems.	Support
B-12-02-01	Division B / 12.2.5. (New)	This proposed change relocates the existing enhancements to National Energy Code for Buildings for allowable fenestration and door	Support – with comments Strongly support this proposed change, as implementing it would eliminate a loophole that

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		area from Supplementary Standard SB-10 to Part 12 in Division B.	currently exists in the 2020 NECB. The loophole allows proponents to claim an energy use reduction credit that does not result in an actual reduction in energy use for certain specific building types. This proposed change will thus help to ensure that all buildings, regardless of their typology will be given equal treatment by the Code.

The City is grateful for the opportunity to provide input on this important matter. If you have any questions, please feel free to contact us.

Sincerely,

Krista Walkey, General Manager, Planning and Building Services

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