



October 1, 2024

MNR – FID – Forest Innovation and Market Development Section
Roberta Bondar Place - 70 Foster Drive, Suite 610
Sault Ste. Marie, ON P6A 6V5

Via e-mail: masstimber@ontario.ca

Re: ERO# 019-8268 Response to Consultation on the Proposed Advanced Wood Construction Action Plan

To Whom It May Concern:

The Residential Construction Council of Ontario (RESCON) welcomes the opportunity to comment on the consultation on the Proposed Advanced Wood Construction Action Plan.

RESCON is Ontario's leading association of professional residential builders, committed to providing leadership and fostering innovation in the industry. RESCON represents builders of high-rise, mid-rise and low-rise homes, who construct the bulk of Ontario's new housing. Our goal is to work in cooperation with government and related stakeholders to offer realistic solutions to a variety of challenges facing the residential building industry, which in turn have wider societal impacts. The focus of RESCON's work is on labour relations; health and safety; training and apprenticeship; industry research and innovation; regulatory streamlining; and technical standards.

In broad terms, RESCON is supportive of any measures that will assist in providing new home builders, trade partners, and consumers with more choice and affordable options in the construction of new homes. The residential construction industry has always enjoyed an appreciation for wood as a construction material. As a low-carbon building material, the construction industry looks to the forestry sector to help reduce our carbon footprint. In simple terms, wood is good!

Our review of the proposed Advanced Wood Construction Action Plan is positive and we encourage the provincial government to continue to consult with our industry and our respective trade unions to further develop best engineering practices along with training and education materials. We agree that advanced wood construction, products and practices should be considered in modular construction as well as tall buildings as demonstrated in other jurisdictions such as British Columbia. There are opponents however, who believe that wood construction has limitations. We believe this may simply be a misconception due to lack of education or documented research. For example, in August 2024 the BC Building Code enabled permissions for the design and construction of new residential multi-family, single exit stair buildings of wood construction. Even though this type of building form is permitted in other jurisdictions, there was significant opposition to the proposal. This type of building is not currently permitted in Ontario. The Proposed Advanced Wood Construction Action Plan should target these misconceptions and help to broaden the market acceptance of engineered wood products and systems.

Once again, we appreciate this opportunity to share our comments and review with respect to the consultation. We encourage the provincial government to continue in every way possible to promote policies, regulations and legislation that supports the construction of residential housing at a time when

the housing affordability and supply crisis is substantially impacting the ability of the housing sector to affordably construct residential homes across Ontario. As always, we are available to collaborate and welcome the opportunity to assist the provincial government, and all levels of government, as we work together to meet these challenges.

Sincerely,
RESCON