



Feedback on the Proposed Regulations under the Planning Act and the City of Toronto Act, 2006: “*Proposed Regulations—Complete Application*”

ERO number: 025-0462

Key Takeaways

- The Cement Association of Canada is **supportive** of the Ontario government’s agenda to accelerate housing and infrastructure development, including via the proposed Bill 17 the Protect Ontario by Building Faster and Smart Act, 2025, and associated regulations.
- The limitations to studies and reports that can be requested by municipalities as part of complete applications may have **unintended consequences** that impede future modernization and investment in Ontario’s building material industries – including cement and concrete.
- Ontario-produced cement and concrete are essential for infrastructure and form the backbone of Ontario’s economy. Cement and concrete are used to build roads, homes, schools, bridges, and more.
- Investments made by the Province, especially in Ontario’s clean grid, and by our members have fostered an environment where Ontario manufacturers produce some of the lowest-carbon cement in the world. Life Cycle Assessments (LCAs), Embodied Carbon Analyses, and Environmental Product Declarations (EPDs) are the methods that Ontario-based manufacturers rely on to demonstrate the environmental performance of their products and solutions.
- Ensuring that municipalities can continue to request studies like LCAs, Embodied Carbon Analyses, and EPDs will **support, promote, and prioritize products made in Ontario** and Canada when these studies are included in procurement processes. This encourages the procurement of Ontario- and Canadian-produced steel, cement, concrete, forestry products, and other construction materials for provincially funded infrastructure projects, thereby safeguarding the future of Ontario’s cement manufacturing sector and other Ontario-based producers of construction materials.
- The Cement Association of Canada recommends that studies related to embodied carbon and LCAs, environmental and building performance, and climate resilience remain explicitly permitted in the regulations. To decrease the

Concrete
building
for life.

Le béton
bâtir pour
l’avenir.



complexity and administrative burden of these requests, the Cement Association of Canada recommends that all municipalities adopt a standard approach, such as the [Treasury Board of Canada Secretariat's Standard on Embodied Carbon in Construction](#).

Background: Current Challenges in Ontario Cement Manufacturing

The threat of tariffs on Canadian goods by the U.S. has created significant uncertainty throughout Canada's and Ontario's economy, resulting in a downturn in demand for building materials, including cement and concrete.

As well, increasing volumes of imported cement from countries with limited environmental and labour standards has also contributed to reduced demand for cement manufactured here in Ontario in recent years.

The downturn in demand is a **threat to the strength of Ontario's manufacturing sector**, including for future investments in modernization and additional infrastructure.

Against the backdrop of increasing instability impacting global supply and demand, it is critical to **support local Ontario cement and concrete producers** against unfair competition from jurisdictions with lower environmental, social and labour standards who leverage practices such as oversupply and dumping into foreign markets to gain an advantage by undercutting on price.

Similarly, Ontario's industrial manufacturers need support from all levels of government to ensure that cheaper, carbon-intensive materials do not erode local, domestic, low-carbon manufacturing.

Public procurement, across federal, provincial and municipal government, of made-in-Ontario materials supports domestic manufacturing, increases competitiveness, creates jobs, and attracts investment in modernization and productivity improvements.

Accordingly, the Cement Association of Canada is **pleased with and strongly supports the commitment in Ontario Budget 2025 to promote and prioritize made-in-Ontario and made-in-Canada products, including making Canadian steel, cement, forestry and other construction materials mandatory for provincially funded infrastructure projects.**

We recommend the Government of Ontario continue to take actions to support a "**Buy Ontario**" approach, driving up demand by **ensuring that all infrastructure and housing projects and otherwise implicated procurement supports Ontario-produced cement and concrete.**



Bill 17 Regulatory Risks

Given the context of the current landscape, it is vital that legislative and regulatory efforts to support Ontario's growth agenda do not lead to unintended consequences that could hamper domestic manufacturing.

Due to investments made by the Province of Ontario in a clean electricity grid, as well as investments made by companies to improve efficiency and lower carbon emissions, Ontario's building materials meet **high standards, including environmental attributes**.

We appreciate the intention of the regulations associated with Bill 17 to streamline and accelerate housing supply, but we are concerned that the proposed limits on certain studies – especially those concerning environmental attributes – **may cause municipalities to unknowingly avoid using domestically-produced cement and other building materials**.

This could lead to **increased use of imported building materials**, manufactured in jurisdictions with lower environmental standards and with fewer investments in modernization and efficiency. This would compound the issue of **declining demand** that manufacturers are currently facing in Ontario.

Additionally, many study types – including LCAs, Embodied Carbon Analyses, and EPDs – are already well known to Ontario municipalities, and the building industry. Ontario and Canada have a strong ecosystem that supports the development, submission, and review of these types of studies. This is demonstrated by numerous green building standards, including the Canadian Green Building Council's Net Zero Carbon Standard, LEED certification, and BOMA Best. Ontario leads Canada in building innovative and sustainable structures, with the most certified green buildings of any province. The Treasury Board of Canada has developed a Standard on Embodied Carbon in Construction, which is an approach to disclose and reduce the embodied carbon associated with federal construction projects. This Standard has been applied to more than 30 projects, many of which are located in Ontario. As of January 2025, the Canadian Board for Harmonized Construction Codes, which oversees the development of the national model codes, has prioritized incorporating embodied carbon emissions into the 2030 code. These studies will also play a significant role in future updates of the 2030 Model Building Code.

To protect domestic manufacturing of building materials in Ontario, the Cement Association of Canada recommends that the final version of the regulations explicitly allow studies related to:

- Embodied carbon and life cycle impact
- Environmental and building performance
- Resilience to flooding, overheating, and extreme weather



As well, to decrease the complexity and administrative burden of these requests, the Cement Association of Canada recommends that all municipalities adopt a standard approach, such as the [Treasury Board of Canada Secretariat's Standard on Embodied Carbon in Construction](#).

We appreciate the opportunity to provide this submission. We are available to discuss our recommendations further: please contact Adam Auer, President and CEO of the CAC at aauer@cement.ca or 613-236-9471 Ext. 3.

Sincerely,

A handwritten signature in blue ink that reads "A. Auer".

Adam Auer
President & CEO
Cement Association of Canada