ONTARIO COALITION FOR FAIR CONSTRUCTION PRACTICES

June 14, 2012

All MPPs
Legislative Assembly of Ontario
Toronto, ON

Dear XX,

Re: Bill 52, An Act to amend the Building Code Act, 1992 with respect to the height of wood frame buildings

We are writing you as representatives of Ontario’s construction materials industries to set out some principal concerns that we have with respect to Private Members’ Bill 52.

Like many Ontarians, we were disappointed to learn that the Bill received passage at second reading in the Legislature, was referred to the Standing Committee on Regulations and Private Bills for further study and review, and by a vote of three-to-two voted back to the Legislature to be placed on the Order Paper.

One of the issues that we have been following over the past year has been changes to the Ontario Building Code (OBC). Our Coalition believes that any proposed changes to the OBC must address all safety and fire implications. The fire in Richmond, BC last year of that province’s first 6-storey wood frame building was evidence of the significant risks associated with buildings constructed of wood and the unrecognized consequences of moving too quickly on Code changes.

In light of the Private Members’ Bills introduced by Nipissing MPP Vic Fedeli and Thunder Bay MPP Bill Mauro, both of which would politically direct amending the OBC to allow for wood frame construction to be used in mid-rise buildings up to six stories from the current four stories, we felt that it was important to inform you of our concerns.

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It is very important for the Committee to know that during last spring’s meetings of the Ontario Part 3 and 4 Technical Advisory Committees (TAC), both committees rejected the proposed mid-rise wood frame construction code changes. It was concluded that the proposed changes lacked any concrete substantiation or documentation to support
them and that further study and testing would be required to ensure the safety and structural integrity of the proposed changes.

Currently the National Research Council and the Canadian Wood Council are involved in an extensive two year research project entitled “Wood and Wood-Hybrid Mid-rise Buildings. The project will investigate the mid-rise wood changes recently adopted in BC. The program will evaluate and conduct performance testing of the proposed wood and wood-hybrid solutions in a variety of applications. The results of the test program will form the basis for the changes that will be proposed for the 2015 National Building Code of Canada (NBCC). It would be wise of Ontario to await the completion of this work before hurriedly adopting untested solutions in Ontario.

We believe that any changes to the Ontario Mid-rise Wood Frame code should be deferred until after issuance of the 2015 NBCC, to allow time for proper assessment and coordination with its review process. Political interference in the established code development process is an unnecessary and potentially dangerous route.

We understand that governments want to support domestic forestry interests, but there are other appropriate ways of accomplishing this. All construction materials should compete in a fair and open market place. We do not believe it is the government’s role to favour one type of building materials over others in public construction.

We ask that you not support Bill 52 and recommend that it should not receive further consideration in the Legislature.

We welcome an opportunity to meet or discuss further with you any additional information you might require.

Yours sincerely,

Ed Whalen, President
Canadian Institute of Steel Construction

Ron Watkins, President
Canadian Steel Producers Association

Dan Tadic, Director
Canadian Welding Association

Paul Hargest, President
Canadian Concrete Masonry Producers Association
Martin Vroegh, Corporate Environment Manager
St. Marys Cement

John D. Hull, President
Ready Mixed Concrete Association of Ontario

Jack Prazeres, President
MasonryWorx

Michael B. McSweeney, President & CEO
Cement Association of Canada