

Chief Executive Officer



February 16, 2024

CFN 70826

**BY EMAIL ONLY**  
[codeinfo@ontario.ca](mailto:codeinfo@ontario.ca)

Ministry of Municipal Affairs and Housing  
Building and Development Branch  
12<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON M7A 2J3

**Re: ERO# 019-8129 Consultation on proposed Building Code Amendments to expand provisions of Encapsulated Mass Timber Construction**

Thank you for the opportunity to comment on the proposed amendments to the Building Code to expand provisions of Encapsulated Mass Timber Construction (EMTC). Toronto and Region Conservation Authority (TRCA) is in the process of constructing a four-storey, 86,000 square foot cedar clad, mass timber new administrative office building at 5 Shoreham Drive in the City of Toronto. This wood first building is on track to achieve many targeted sustainability certifications, including LEED v4 Platinum certification and WELL Building Standard v2 Silver. This is in addition to having already been awarded the Zero Carbon Building Design Certificate and the inaugural Ontario Embodied Carbon Award for New Construction. Further details can be found on TRCA's [project webpage](#).

**Government Proposal**

We understand that the Ministry of Municipal Affairs and Housing (MMAH) is considering changes to the Ontario Building Code related to the use, maximum height, and application of EMTC. If approved, these changes would allow for more flexibility and the expanded use of mass timber construction, facilitate faster construction, reduce on site disruptions, and have environmental benefits. As noted in the posting, Ontario is seeking comments at the same time as the national consultation process by the Canadian Board of Harmonized Construction Codes (CBHCC).

**General comments**

TRCA supports this initiative from a climate and environmental perspective. Wood is a renewable and sustainable resource and the expanded use of EMTC is a very positive step toward meeting Ontario's building needs. The use of wood reduces the carbon impact of construction compared to traditional construction materials and methods; it supports Ontario's Forest Sector Strategy to create jobs and encourage economic growth in the forest industry; and prefabrication allows for reduced construction timeframes, costs, and disturbance to the local community. Overall, we believe the

proposed changes will have a positive impact on sustainability in all four lenses: climate, environment, social and economic.

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks or TRCA's experience with the construction of our new office building, please contact the undersigned at 416.667.6920 or at [john.mackenzie@trca.ca](mailto:john.mackenzie@trca.ca).

Sincerely,

<Original signed by>

John MacKenzie, M.Sc.(PI) MCIP, RPP  
Chief Executive Officer

Cc: Laurie Nelson, Director, Policy Planning  
Darryl Gray, Director, Education and Training  
Alexander Schuler, Associate Director, Property and Asset Management