

November 25, 2019

Building Services Transformation Branch
Ministry of Municipal Affairs and Housing
777 Bay Street
16th Floor
Toronto, Ontario
M5G 2E5

By email: buildingtransformation@ontario.ca

RE: Environmental Registry of Ontario posting 019-0422 Transforming and Modernizing the Delivery of Building Code Services

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

Ontario's agricultural and agri-food sector is among the most diverse agriculture sectors in North America. Well over 200 different agricultural commodities are grown and raised here; more than any other Canadian province and most US states. That diversity leads to differing building forms to house livestock or poultry, to store different crops, or the machinery used to grow and raise these different agricultural commodities.

Farm buildings can have their own unique structural requirements, such as the option to use ungraded lumber in single-storey, low human occupancy farm buildings. Additionally, the Ontario Building Code defers to the National Farm Building Code of Canada (1995) for some structural requirements.

OFA will focus its comments on Theme 4: Improving Building Sector Supports.

4.1 Promoting a Consistent Application of Code Requirements

1. Would you support the issuance of technical bulletins and/or code interpretations? Please explain.

Yes, technical bulletins and/or code interpretations would be helpful, specifically ones focussed on the requirements related to agricultural buildings and structures, including housing for seasonal agricultural workers, often referred to as "bunkhouses".

- 2a. If additional resources and guides to help with code interpretation were created, what types of resources (e.g. type of content, format, etc.) would be most useful?

OFA offers no comments on this item.

- 2b. Would the addition of more visual guidance materials for specific building code issues be helpful?

OFA offers no comments on this item.

3. As a member of the public, what resources and tools would you need to assist you with understanding code requirements for your small or personal construction projects (e.g. minor renovations, decks, sheds, etc.)

4.2 Digital Transformation

Agricultural and rural Ontario struggles with a lack of access to high speed internet. Unlike our urban areas, Ontario's agricultural and rural simply cannot access high speed internet services. This would render use of an electronic version of the Code impossible, regardless of device type. Before we can offer advice on usage of an electronic version of the Code, agricultural and rural Ontario needs access to high speed internet services.

1. If you would use an electronic version of the Code, on what type of electronic device would you most frequently view/use it on? (e.g. laptop/desktop, mobile device)

OFA offers no comments on this item.

2. In addition to digital versions of the Ontario Building Code Compendium, what other digital guides, resources or tools would you find most useful?

OFA offers no comments on this item.

4.3 Building Sector Data and Research

1. Does your organization collect building sector data? Do you have any policies in place for digital collections, management, and/or transparency?

No, we do not collect any building-related data from our members.

2. How could the potential increase in municipal reporting burden be mitigated?

OFA offers no comments on this item.

3. Do you think it would be beneficial if the administrative authority conducted research on behalf of the sector?

OFA offers no comments on this item.

Funding Better Service Delivery:

We know from speaking with our members that there is a substantial variance in building permit fees charged to farmers planning to build or expand an agricultural building or structure. Fees in some municipalities are extremely high, with other municipalities charging much lower fees. The variance between neighbouring municipalities can be substantial.

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If building permit fees are intended to cover the costs of permit review, issuance and on-site inspections, then the substantial variance between municipalities cannot be justified. Given the substantial variance in building permit fees currently charged to farmers planning to build or expand an agricultural building or structure, OFA cannot support an additional levy on fees

1. Is the proposed funding model a reasonable approach to delivering improved services to the sector?
2. Are there impacts in implementing such a fee model that the government should consider?

OFA appreciates this opportunity to provide its perspective on transforming and modernizing the delivery of Building Code Services. We look forward to the Ministry of Municipal Affairs and Housing incorporating OFA's suggestions.

Sincerely,



Keith Currie
President

KC/pj

cc: The Honourable Steve Clark, Minister of Municipal Affairs and Housing
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors