

December 13, 2023

Ministry of Municipal Affairs and Housing
Building and Development Branch
12th Floor, 777 Bay Street
Toronto, Ontario
M7A 2J3

Canadian Board for Harmonized Construction Codes
1200 Montreal Road, building M-20
Ottawa, Ontario
K1A 0R6

Submitted via email to codeinfo@ontario.ca & Codes.publicreview@nrc-cnrc.gc.ca and via online through the Environmental Registry of Ontario and the Ontario's Regulatory Registry

To Whom It May Concern:

RE: ERO #019-7832/23-MMAH020: Consultation on the 2025 National Construction Codes (Nov-Dec 2023)

The Ontario Federation of Agriculture (OFA) appreciates the opportunity to comment on ERO # 019-7832 & Regulatory Registry # 23-MMAH020: Consultation on the 2025 National Construction Codes (Nov-Dec 2023). We understand that this consultation is in concert with the Canadian Board for Harmonized Construction Codes – Public Review of Proposed Changes to the 2020 National Model Codes. Consulting with the farm business community is imperative to a thriving agricultural industry and economy in Ontario, to reduce red tape and achieve the priorities in the province's ambitious Grow Ontario agri-food strategy.

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating nearly 750,000 jobs, and contributing over \$47 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable and responsible food supply. By removing barriers, unnecessary costs and red tape, Ontario farmers will be positioned to seize opportunities and rise to the challenge of an ambitious growth strategy, allowing the agri-food sector to drive the economy forward.

Ontario's diversity in agricultural production requires unique building forms to house livestock or poultry, to store various crops, to house the machinery and inputs used to grow and raise agricultural commodities, and to provide quality worker housing, each having their own distinctive structural and operational requirements. OFA generally supports the proposed change to the 2025 National Construction Codes (NCC) relating to Farm Buildings and recognizes that clarity and consistent interpretation and application of construction and building requirements are paramount to a thriving agri-food sector in Ontario.

Currently, windows or panels potentially used as exits in farm buildings have no requirements for interior sill height. NCC Proposed Change 1784 establishes a maximum interior sill height (900mm) to ensure openable windows or panels can be accessed for evacuation in case of emergency. The proposed change further allows for a higher sill height (1500mm), with installation of a foothold for access (at no less than 600mm), in livestock-occupied parts of the Farm Building.

OFA understands the need to address safety precautions within farm buildings and how both maximum sill heights and appropriate footholds will ensure increased safety in emergency situations. However, we request that livestock commodity groups such as Dairy Farmers of Ontario and Beef Farmers of Ontario are specifically consulted to ensure this change does not conflict with their operations.

OFA understands that this proposed change would apply to new construction and be enforced using the existing regulatory framework. While authorities having jurisdiction are familiar with this requirement already in force for other types of buildings, the proposed change will be new to those involved with the design, construction and operation of farm buildings. Additionally, OFA members often struggle with inconsistent interpretation and application of OBC conditions at the municipal level. We ask that there be plain and marked indication of these requirements such that those affected are sufficiently informed prior to a building's construction. The OFA would be amenable to the development of a factsheet or guidance document to assist building owners' understanding of these changes and requirements moving forward and would welcome the opportunity to assist in its development.

We appreciate the opportunity to provide our feedback and agricultural perspectives on the 2025 National Construction Codes. We look forward to working with the provincial government and other relevant stakeholders to update and improve the National Construction Codes regarding health and safety and the protection of farm structures while ensuring the continued success and prosperity of the agricultural sector.

Sincerely,



Drew Spoelstra
President

cc: Hon. Lisa Thompson, Minister, Ontario Ministry of Agriculture, Food and Rural Affairs
OFA Board of Directors