



**Community Builders...**

**Building Communities**

March 15, 2022

Mayors and Councils  
CRD Municipalities

Dear Mayor and Council

**Re: CRD Proposal to Fast-Track Step Code**

According to reports, the BC govt is planning to establish Step Code 3 by December 2022 throughout the province. BC Housing's Licencing and Consumer Services also plans to establish mandatory education for Step Code 3 this year. VRBA advocated mandatory education before the Step Code was proposed in 2017.

VRBA advises municipalities to adhere to the BC government's mandatory level of energy efficiency rather than use local bylaws to fast-track into Step Codes 4 and 5. BC's history of unintended consequences linked to fast-tracking include leaky condo, asbestos, and urea formaldehyde insulation.

Toxic radon is a concern in today's new housing. A recent presentation at a CARST (Canadian Association of Radon Scientists and Technicians) conference identified:

- *Radon gas has increased steadily over time due to our ever-changing built environment, both in terms of overall exposure concentrations and the duration of exposure. (eg pandemic, home office)*
- *First time home-seekers (i.e. ages 24–44) have more limited financial resources that preclude buying or renting in more expensive older, more established neighbourhoods. They are residing in newer properties with more modern design trends that are also smart-home ready and/or energy efficient.*
- *Younger Canadians are being disproportionately exposed to higher radon and projections paint an alarming picture of rising exposure and younger ages of radon-induced lung cancer diagnosis.*

Depressurization in newer homes may draw in more radon, and they have fewer air changes than older homes. Radon is site specific, not identifiable on "radon maps" which is why BC's map keeps changing for radon mitigation rough-ins. Unfortunately, the BC Step Code establishes high levels of energy efficiency over health and safety—the foundation of a building code.

In addition, to a radon review, the National Code plans to introduce a more affordable prescriptive option. BC has an agreement to harmonize their building code with the National Code and may permit the prescriptive option.

Also, BC wrongly established Step 5 as the only path to Net-Zero ready home. It has now been established through National Code diligence that Net-Zero ready is available at Step 4. Homebuyers will be overpaying tens of thousands of dollars for BC Step Code 5 if required by municipalities.

Presently, the CRD is launching an ill-advised initiative to fast-track the BC Step Code into the highest energy efficiency levels, including Steps 4 and 5. However, BC Housing's planned mandatory builder education is only for Step 3. Education supported by research and proven practice takes time.

VRBA advises disregarding the CRD's attempts to fast-track the Step Code, in the interests of health and safety, consumer protection and affordability. Wait for the BC government to establish mandatory Step Code levels, which will be accompanied by mandatory building envelope education. We hope the changes will be more in line with the education, due diligence and consumer protection VRBA recommended years ago.

VRBA continues to support the Built Green Canada program offering energy efficiency supported by mandatory education, certification, as well as water conservation, recycling and affordability for homebuyers.

For additional information, feel free to contact me at 250-383-5044.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Casey Edge', written in a cursive style.

Casey Edge  
Executive Director