



Canada
Green
Building
Council

Conseil du
Bâtiment
Durable du
Canada

May 14, 2026

To: Ministry of Municipal Affairs and Housing- Planning and Housing Policy Branch
via email: PlanningConsultation@ontario.ca

Re: Proposed legislative changes to the *Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001* through Bill 98, the proposed *Building Homes and Improving Transportation Infrastructure Act, 2026*–[ERO 026-0300](#)

The Canada Green Building Council (CAGBC) provides solutions and services the building sector needs to construct and manage buildings that are easier on resources, healthier for people, resilient and cost-effective. We work with the sector to influence standards, develop best practices, and educate the market on the benefits of green buildings.

CAGBC recognizes the urgent need to expand housing supply across Ontario and the government's stated objective of reducing barriers that slow delivery. Ontario needs more homes, faster. It is equally important that the homes built today are affordable to own and operate over time, resilient, and designed to serve communities well for decades to come.

Bill 98 is significant because it reshapes how housing and infrastructure may be planned and delivered across the province, including the role municipalities can play in advancing environmental performance through development requirements. As Ontario moves forward with implementation and with its review of the building code, there is an important opportunity to ensure that efforts to accelerate supply are matched by a strong, modern, and predictable province-wide approach to building performance.

For CAGBC, the issue is not whether Ontario should build faster. It should. The question is how to ensure speed and quality advance together. A housing system focused only on minimum upfront cost can create higher costs later, through higher utility bills, avoidable retrofit needs, and greater exposure to climate and energy risks. A better approach is to build homes that perform well over time, lower operating costs, and deliver lasting value for households and communities. These ideas have strong support among Canadians. A recent [Abacus Data poll, commissioned by CAGBC](#), found that 73% of Canadians view energy-efficient buildings positively, 65% believe such homes would improve their quality of life, and a significant 86% support stricter energy-efficiency standards in new construction.

This moment also calls for policy coherence. As the government advances its building code review, it will be important to align that work with Ontario's broader energy objectives. Minister Lecce's 2025–2036 Electricity Demand-Side Management



Framework, including the province's long-term commitment to demand-side investment through the IESO and Save on Energy programs, reflects the importance of reducing energy demand and delivering lasting savings for ratepayers. Better-performing homes are a practical extension of that direction. Homes that use less energy and perform better over time can help lower household costs, reduce pressure on the grid, and make better use of public and private investment in energy efficiency.

Bill 98 also changes the context in which building performance will be shaped in Ontario. If municipalities have fewer tools to require higher levels of performance through local green development standards, then the provincial framework becomes even more important. In that context, the building code review is not just a technical exercise. It becomes a key mechanism for determining whether new housing delivers not only speed, but also the efficiency, resilience, quality, and long-term affordability Ontarians need.

This matters not only from a policy perspective, but from an economic one. Ontario's green building sector is already a significant contributor to the provincial economy, [generating \\$33 billion in GDP and supporting more than 217,000 full-time equivalent jobs](#). Maintaining momentum in high-quality, high-performance construction helps support innovation, skilled employment, investment attraction, and the broader competitiveness of Ontario's economy.

It also matters to homebuyers. [Tarion's 2024 consumer survey](#) found that price remains the leading factor in the purchase of a new home at 98%, followed by size at 96%, while style or design and energy efficiency of the home both ranked at 92%. Energy-efficient appliances also ranked highly at 91%. In a time when living costs remain top of mind, this points to energy performance as an important part of the value proposition homebuyers are looking for.

CAGBC stands ready to work constructively with the Ontario government and industry partners to help identify practical pathways that support both housing supply and housing quality. With a clear and coherent province-wide approach, Ontario can deliver homes more quickly while also advancing efficiency, resilience, and long-term affordability. That is the path most likely to serve Ontarians well and support a stronger, more competitive province.

Sincerely,

The Canada Green Building Council