



From the office of the Chief Executive Officer / Du cabinet du chef de la direction

15 March 2024

The Honourable Sean Fraser, P.C., M.P.
Minister of Housing, Infrastructure and Communities
House of Commons
Ottawa, Ontario K1A 0A6

Via E-mail (minister-ministre@infcc.gc.ca, catalogue@infcc.gc.ca)

Re: Housing Design Catalogue

Dear Minister:

Thank you for the opportunity to comment on the Government of Canada's proposal to introduce a national Housing Design Catalogue.

Engineers Canada represents the 12 provincial and territorial engineering regulators in Canada, which collectively license the more than 300,000 members of the engineering profession. As the only national voice for the engineering profession, we have a history of collaborating with the federal government to inform and develop legislation, regulations, and policies.

Professional engineers play an essential role in the building process by ensuring that various development scenarios align with provincial building codes, meet local infrastructure requirements, and accommodate user- and site-specific engineering needs. Provincial and territorial engineering regulators hold professional engineers accountable and keep Canadians safe.

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The Government of Canada's consultation paper indicates that a primary goal of the Housing Design Catalogue will be to provide pre-approved designs that can overcome the cost and complexity of engineering work. Where an aspect of design or construction may impact public safety, the critical role that professional engineers play is not an obstacle to overcome. Engineers safeguard the public, and where provincial, territorial, or municipal laws or regulations require the involvement of a professional engineer, those requirements must be respected.

We are pleased that the Consultation Paper provided by the Canada Mortgage and Housing Corporation recognizes that as projects increase in complexity, the engineering considerations become more diverse, reducing the effectiveness of standardization. We agree with the conclusion that such projects, including high-rise developments and conversions of existing properties, are not appropriate for a standardized catalogue.

While it is not necessarily the case that small to mid-rise developments do not require complex engineering work to align with municipal planning approval requirements and processes or to meet user- and site-specific needs, these kinds of projects are likely more suitable for efforts at standardization. To ensure that the standardized designs align with provincial building codes and protect public safety, the government should require that a qualified professional engineer approve each standardized design.

Ensuring that engineers are involved in approving each standardized design will reduce potential concerns around quality control and public safety. However, this would not negate the need for a professional engineer to be involved in any deviation from the standardized design due to unanticipated geotechnical or climatic conditions or other user- and site-specific engineering needs.

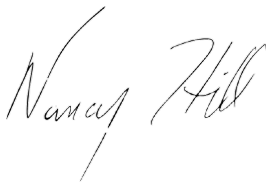
Engineers Canada understands the importance of reducing barriers to the introduction of new housing supply in Canada. While a standardized design catalogue can be a useful tool, it is not a one-size-fits-all solution. The success of such tools during the 1940s to 1970s is commendable, but in 2024 it is important to recognize that human design considerations have evolved considerably due to changes in our understanding of user-specific needs like accessibility, as well as other public health and safety concerns.

Any standardized catalogue for this generation of housing will need to accommodate a much wider diversity of building styles and community needs than in prior generations. With those considerations in mind, it is most appropriate for the government to consider such a catalogue as a starting point for builders to develop a home that meets the specific needs of the user and community, rather than as a set of cookie-cutter housing options.

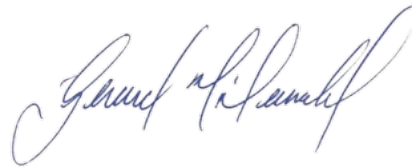
On behalf of our members, we thank the government for the opportunity to engage on this important issue. We urge the Government of Canada to continue engaging directly with provincial and territorial engineering regulators, consulting engineering companies, and associations representing other affected professions, such as architects and planners.

We welcome the opportunity to engage with you and your team to discuss this important issue and others. To schedule a meeting, please contact Nathan Durham, Manager, Public Affairs at 613.232.2474 x265 or nathan.durham@engineerscanada.ca.

Yours sincerely,



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