

February 22, 2024

Sean LeRoy
Executive Director, Built Environment Branch
Ministry of Energy, Mines and Low Carbon Innovation

Sent by email: HEES@gov.bc.ca

Response to regulatory consultation re: Highest Efficiency Equipment Standards

Dear Sean LeRoy:

I write to you on behalf of the Mechanical Contractors Association of British Columbia (MCABC), representing members in the Industrial, Commercial and Institutional (IC&I), high rise, multi-family and residential sectors. Mechanical Contractors comprise construction's 10 core trades – plumbers, refrigeration and air conditioning mechanics, steamfitters/pipefitters, boilermakers, gasfitters, sheet metal workers, welders, insulators, sprinkler fitters and instrumentation and control technicians – whose technical expertise enables the delivery of clean air, clean water and comfort for British Columbians. Mechanical Contractors are part of the fabric and infrastructure of every community in B.C.

MCABC supports the intentions of CleanBC's point of sale standards; however, the technology is not currently available to satisfy the needs of the colder climates in B.C. To address this and ensure success, we do hope you will consider the following four recommendations:

MCABC's Recommendations:

1. **Phase the proposed approach by climate zone** – as noted above, this is important to addressing the heating needs of the existing infrastructure in the colder climate zones in the province. Existing buildings often have constraints, such as internal distribution into finished spaces and available exterior space, that new construction does not – this results in design constraints that heat pumps cannot overcome, especially at very low outdoor temperatures. This approach also aligns with the BC Building Code.

2. **Provide clarity and financial support to building and home owners** . The Point of Sale Standards will have significant financial impact and, in many cases, create financial hardship, particularly where an existing building is not well suited to be transitioned to high efficiency equipment. An example includes a high temperature hot water radiator distribution system throughout the finished space.
3. **Consider emergency breakdowns in existing buildings.** If premature breakdowns occur in gas fired equipment, especially during the winter months, upgrading to high-efficient equipment may not be a reasonable option. There is a strong likelihood that life-safety issues, unlivable housing, liability for loss of business by tenants, damage to buildings due to freezing and other issues may result if heating cannot be restored. In these situations, there won't have been adequate time to upgrade to a 100% + efficient system as the following cannot be neglected:
 - a. Time for planning,
 - b. Time for building permits
 - c. Availability of equipment,
 - d. Availability of contractors/workforce,
 - e. Timelines to obtain financing
 - f. other considerations related to the coordination and execution of a substantial project.
4. **Upskilling & cross-training of Red Seal Contractors imperative** – the shift in the technology our industry will be installing has far-reaching implications for the workforce. We need to leverage the skillset and strengths of the existing mechanical contracting industry through upskilling and cross-training – while continuing to raise awareness of our trades. The current workforce is not sufficient to meet the timeline in the proposed standard and MCABC does not support diluting or abbreviating trades training given necessary competencies and associated risks. MCABC is a proponent of climate action and we invite the opportunity to collaborate with government regarding skilled trades training and certification. Timely consultation on this subject is necessary so we can create real action to support the development and streamlining of the workforce.

MCABC is committed to leading the transition and recognizes that this program runs parallel the BC Hydro investments to the grid that were announced in January.

Sincerely,

Kim Barbero

Kim Barbero
CEO
Mechanical Contractors Association of British Columbia

cc:

Tania Johnston, CEO, MCAC
Damian Stathonikos, President, BOMA
Satinder Chera, CEO, CIPH
Jason Mackenzie, President, CIPH-BC