

Code Pathways for Existing Buildings

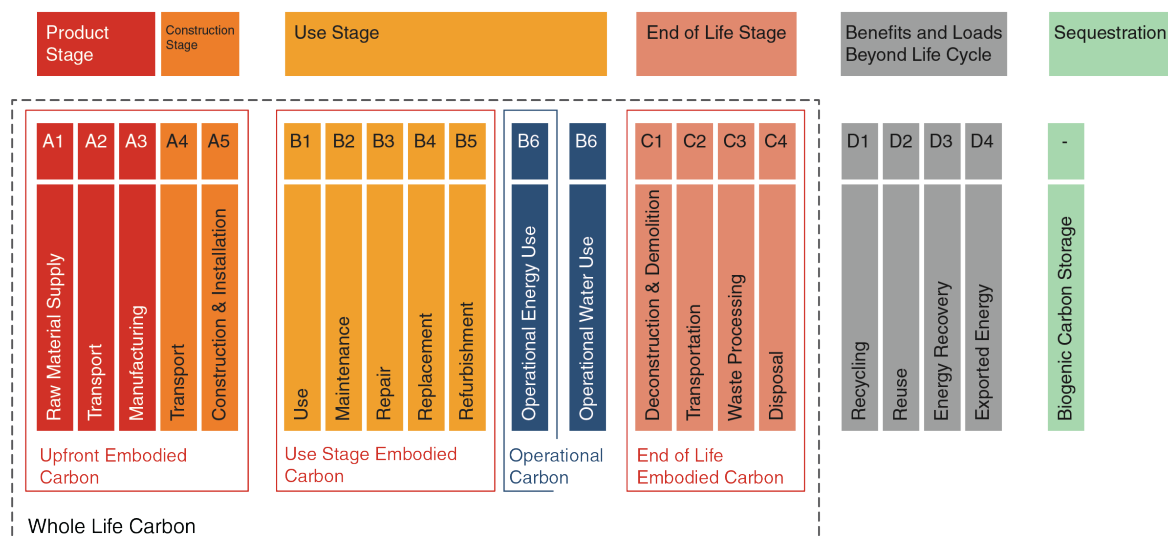


Briefing Note 02

Existing buildings are an embodied carbon investment; the emissions from their original construction are already spent.

Retaining material value, rather than demolishing and rebuilding, is one of the most effective climate actions available. Authorities having jurisdiction and code consultants enable retrofit solutions that maintain code intent while recognizing this reality. Performance-based compliance approaches and alternative provisions meet safety and energy objectives while avoiding unnecessary demolition.

The National Building Code (NBC) and National Energy Code of Canada for Buildings (NECB) 2025, published in December 2025, formally define “existing building” and “heritage building” for the first time and introduce dedicated alteration parts with proportional energy performance requirements for retrofit projects. Where NBC/NECB 2025 has not yet been adopted provincially, these definitions and principles can still inform interpretation and the exercise of discretionary authority.



Life Cycle Assessment (LCA) systems boundaries as defined by EN 15978 and ISO 21930, including biogenic carbon storage.

Excerpts from *Unlocking the Value of Existing Buildings*. This briefing note is part of a series summarizing key insights from *Unlocking the Value of Existing Buildings: a new approach to codes for carbon, culture and cost*. The full report is available here: cahp-acecp.ca/learning-resources/

Call to Action for Authorities Having Jurisdiction & Code Consultants

Recognize Existing and Heritage Buildings in Code Application

- Use the NBC 2025 definitions of “existing building” and “heritage building” in permitting decisions, as heritage buildings may qualify for additional flexibility under the alteration provisions.
- Apply the new alteration parts rather than defaulting to full new-construction standards for retrofit and change-of-use projects.

Implement New Alteration Provisions in Practice

- Familiarize permitting staff with the scope, triggers, and extent-of-alteration provisions in NBC Part 10 and NECB Part 13. They are designed to be proportional, not to impose disproportionate burdens.
- Use the extent-of-alteration framework to prevent compliance requirements from expanding beyond the scope of the work proposed.
- Apply NBC Sentence 10.1.1.5.(1) for fenestration replacements. Replacement components must perform no worse than what they replace; a practical, achievable standard.

Enable Performance-Based Compliance

- Whole-building energy modelling aligned with the NECB’s Objectives and Functional Statements can demonstrate compliance without relying solely on prescriptive component upgrades.
- Performance paths prioritize the most impactful improvements while retaining viable building elements. The tiered improvement framework in the new alteration parts is more appropriate than new-construction airtightness and thermal targets for existing buildings.

Support Retrofit-Focused Code Development

- Advocate for expanded heritage-specific flexibility, whole-life carbon metrics, and proportional GHG emissions requirements for existing buildings in the next code cycle.
- Contribute practical permitting experience to code development bodies to help refine alteration provisions based on real project outcomes.

