

June 6, 2023

RE: Submission on Amendments to the Manitoba Building Code

Keystone Agricultural Producers (KAP) is Manitoba's general farm policy organization, providing a unified voice for farmers on issues that affect agriculture. KAP represents and promotes the interests of over 4,400 farmers and 18 commodity associations. KAP welcomes the opportunity to provide feedback to government regarding its proposed amendments to the Manitoba Building Code.

Manitoba producers require a regulatory environment that is stable, consistent and competitive with other prairie provinces. The province states on its Regulatory Consultation Portal that these regulatory amendments will "support economic development by making it easier for developers to operate consistently across Canadian jurisdictions" as well as "reduce red tape for stakeholders operating across jurisdictions by improving consistency." Unfortunately, the objectives within these statements are not reflected in proposed amendments to farm buildings. This is due to both Alberta and Saskatchewan exempting farm buildings from their provincial building codes. Consequently, inconsistencies remain between Canadian jurisdictions.

The proposed amendments place Manitoba at a competitive disadvantage when it comes to new farm building construction. The province mentions that: "Some stakeholders may experience increased costs, as they adjust their design and construction decisions to reflect the updated codes. This will be the case in the other Canadian jurisdictions as well." However, this is not the case in Alberta and Saskatchewan due to their exemption for farm buildings.

Manitoba producers are also concerned about the temporary nature of these proposed amendments. It appears that these amendments will come into force for a limited time period. This is concerning for producers and farm builders who require consistency and predictability. To address the concerns above KAP is proposing that government amend the Manitoba Building Code to fully exempt farm buildings from the 2020 National Building Code.

Thank you for the opportunity to provide feedback on the proposed amendments to the Manitoba Building Code. If you have any questions about this submission, please contact KAP Policy Manager, Neil Van Overloop, at neil.vanoverloop@kap.ca.

Sincerely,



Brenna Mahoney

General Manager, Keystone Agricultural Producers Inc.