KEYSTONE AGRICULTURAL PRODUCERS

October 20, 2026

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 all Manitoba 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 department states on Engage Manitoba that "a harmonized set of codes reduces regulatory burden, supports labour mobility, and removes interprovincial trade barriers." We support the departments efforts in achieving these goals. And we also applaud the department for continuing specific exemptions for emergency lighting, foamed plastics, and perimeter exiting.

But the farm building amendments do not go far enough. Because Alberta and Saskatchewan exempt farm buildings from construction standards, Manitoba remains at a competitive disadvantage. Not only does this situation create an interprovincial trade barrier but also adds to the regulatory inconsistencies between prairie provinces when constructing farm buildings. And the changes to spatial separation and exposure protection (2.2.9) in the 2025 National Building Code of Canada could add thousands of dollars more in construction costs.

Bringing a fair and competitive building construction environment requires regulatory alignment with Alberta and Saskatchewan. To achieve these objectives, we believe that the department should make additional amendments and exempt farm building construction from the Manitoba 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 letter, please contact KAP policy manager, Neil Van Overloop, at neil.vanoverloop@kap.ca.