



The Corporation of the City of Courtenay

# Staff Report

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**To:** Council  
**From:** Director of Development Services  
**Subject:** Zero Carbon Step Code

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**File No.:** 3800-01-2501  
**Date:** July 30, 2025

## PURPOSE:

This report is to provide information to Council from the engagement process and the options on the implementation and acceleration of the Zero Carbon Step Code.

## BACKGROUND:

At the regular meeting of Council on the 14<sup>th</sup> February 2024 staff provided a report to Council (Attachment 1) providing options on the implementation of the Zero Carbon Step Code (ZCSC) in response to the following Council resolution adopted on 25<sup>th</sup> October 2023

*“THEREFORE BE IT RESOLVED THAT pursuant to policies BL6 and BL7 of Courtenay’s OCP, staff prepare a report outlining options for implementing the Zero Carbon Step Code in order to meet the City’s 2030 emissions reduction target.”*

In response to the implementation options of the ZCSC Council adopted the following resolution.

*“THAT Council adopt the Provincial Zero Carbon Step Code;*

*AND THAT Council direct staff to amend “Building Bylaw No. 3114, 2023” to include the Zero Carbon Performance Levels in accordance with the timelines established in the CleanBC Road Map for all applicable Part 3 and Part 9 buildings starting with EL2 in 2024 and EL3 in 2027 and EL 4 in 2030;*

*AND THAT Council direct staff to engage with the development industry and community to inform on the Zero Carbon Step Code and its mandates”.*

Further to the adoption of the resolution noted above, Council chose to bring back the motion for reconsideration, and at the regular meeting of Council on 28<sup>th</sup> February 2024, Council rescinded the resolution that was adopted at the regular meeting of Council on 14<sup>th</sup> February 2024, and adopted the following resolution

*“THAT in keeping with the City’s Official Community Plan, Council direct staff to incorporate into the 2025 work plan and budget the staff resources and funding required for the engagement and policy development needed to accelerate the adoption of levels EL3 and EL4 of the Zero Carbon Step Code”.*

On 20<sup>th</sup> March 2025 staff initiated the engagement process at the regular developers meeting where staff presented information to the development community of the ZCSC. This included the incremental levels, the CleanBC Roadmap, the current BC Building Code EL-1 level that came into effect on 10<sup>th</sup> March 2025, staff's original recommendation to Council for implementation of the ZCSC and Council's motion noted above for engagement to accelerate levels EL-3 and EL-4.

As part of the engagement strategy a survey was prepared (Attachment 2) and launched at the developers meeting. The link to the survey through the Engage Comox Valley website was also shared with the development community. The survey ran from 20<sup>th</sup> March 2025 and closed on 4<sup>th</sup> April 2025. A copy of the survey and the summary of the survey results (Attachment 3) are provided as part of this report.

### **DISCUSSION:**

The respondents to the survey predominantly construct Part 9 single family and multifamily dwellings within the City of Courtenay and the Comox Valley Regional District. 75% of the respondents were aware of the ZCSC, the EL-1 adoption in the British Columbia Building Code (BCBC), but only 38% of those respondents were aware of the CleanBC Roadmap.

Although 38% of the respondents have constructed buildings to the ZCSC with 34% achieving EL-2 and 67% achieving EL-4, higher construction costs and the effect on affordable housing were the main concerns with introducing the higher levels of the ZCSC at this time.

The responses received from the developers meeting and the survey results aligned with staff's recommendation to Council at the regular meeting of Council on February 14, 2024 with one exception. The exception was staff proposed to follow the Clean BC Roadmap as it included a timeline for the introduction of the higher levels of the ZCSC, where the development community supported following the BCBC. The BCBC does not have any fixed dates for introducing the higher steps of the ZCSC at this time.

In view of the feedback from the development community, the CleanBC Roadmap, the BC Building Code and neighbouring jurisdictions, staff support Council's original resolution from 14<sup>th</sup> February 2024 to adopt the ZCSC and to follow the performance levels in accordance with the timelines established in the CleanBC Roadmap. This would see the introduction of EL-2 starting on 1<sup>st</sup> January 2026 followed by EL-3 in 2027 and EL-4 in 2030 for all applicable Part 9 and Part 3 buildings.

Should Council consider adopting the ZCSC and moving forward with accelerating the higher levels ZCSC, staff recommend adopting EL-3 starting on 1<sup>st</sup> January 2026 followed by EL-4 on the 1<sup>st</sup> January 2028 for all applicable Part 9 and Part 3 buildings. This would accelerate the ZCSC two levels higher than the current BC Building Code requirements and one level higher than the CleanBC Roadmap. With the further introduction of EL-4 beginning 2028 would place the City of Courtenay two years ahead of both the BCBC and the CleanBC Roadmap.

### **POLICY ANALYSIS:**

The Community Charter provides municipalities the authority to regulate, prohibit and impose requirements by bylaw in respect to buildings and structures (Part 2: Division 1 Section 8).

The City of Courtenay Official Community Plan outlines objectives and policies (BL6 and BL7) to accelerate energy efficiency and to regulate carbon pollution for new buildings.

The CleanBC Roadmap launched in late 2018 sets out policies on climate change and the reduction of greenhouse gas (GHG) emissions with a range of accelerated actions for zero carbon in new buildings by 2030.

**FINANCIAL IMPLICATIONS:**

Should Council give direction on the implementation of the Zero Carbon Step Code, staff time for policy development and legal review was included in the 2025 budget.

**OPTIONS:**

1. THAT Council adopt the Provincial Zero Carbon Step Code; and

THAT Council direct staff to amend “Building Bylaw No.3114 “ to include the Zero Carbon Step Code Performance Levels in accordance with the timelines established in the CleanBC Roadmap for all applicable Part 3 and Part 9 buildings starting with EL-2 in 2026, EL3 in 2027 and EL 4 in 2030.

**(Recommended)**

2. THAT Council adopt the Provincial Zero Carbon Step Code; and

THAT Council direct staff to amend “Building Bylaw No.3114 “ to

- a) require all applicable Part 3 and Part 9 buildings meet the Zero Carbon Performance Level (EL-3) of the Zero Carbon Step Code from January 1, 2026; and
- b) require all applicable Part 3 and Part 9 buildings meet the Zero Carbon Performance Level (EL-4) of the Zero Carbon Step Code on January 1, 2028.

3. That Council not proceed with implementation of the ZCSC at this time.

**ATTACHMENTS:**

1. February 14, 2024 Staff Report - Zero Carbon Step Code
2. Zero Carbon Step Code Survey
3. Zero Carbon Step Code Survey Results

Prepared by: Paul Preston, RBO, Manager of Building Services,

Reviewed by: Marianne Wade, MCIP, RPP, Director of Development Services

Concurrence: Geoff Garbutt, M.P.I, MCIP, RPP, City Manager (CAO)