

May 17, 2017

Modular Housing Association – Prairie Provinces  
Attn: Sandra Nigro  
P.O. Box 3538 Station Main  
Sherwood Park, AB T8H 2T4

email to:  
snigro@mhaprairies.ca

Original to follow

RE: ENERGY EFFICIENCY COMPLIANCE DOCUMENTATION FOR MODULAR HOUSING

Dear Sandra:

This letter serves to clarify the requirements for the submission of energy efficiency compliance documentation to local authorities, as it relates to factory-built structures.

There have been instances raised by MHAPP where local authorities have required factory-built homes to meet the same documentation requirements as site-built homes, namely the completion of forms to demonstrate energy efficiency compliance. However, site-built and factory-built structures follow different approval processes and must be considered separately.

As required by the Alberta Building Code, factory-constructed buildings must be certified in accordance with CSA A277, "Procedure for Factory Certification of Buildings," by an organization accredited by the Standards Council of Canada. Under this quality program, manufacturers are required to retain documentation relevant to the design and construction of products, which have to be made accessible to the certification agency for review at the time of in-factory inspection. The certification agency is responsible for auditing manufacturers to ensure compliance to the applicable codes and standards, both through random inspection of products and review of manufacturing records.

Conversely, site-constructed buildings require the local authority to review plans and specifications submissions and perform building inspections at various stages of completion. Local authorities have also developed checklist forms for site-built homes, particularly pertaining to energy efficiency compliance.

As a manufacturer of a factory-constructed building is subject to a quality assurance program, it is redundant and unnecessary for the manufacturer to meet the same

energy efficiency documentation requirements as site-constructed builders. Factory-constructed buildings should include information on the specification sheet affixed to the home that indicates the climate zone the building is intended for, but further documentation on the building's energy efficiency performance is not required to be submitted to the local authority, as building design compliance falls under the scope of the CSA A277 quality program.

Should you have any questions please contact me at your convenience.

Sincerely,

A handwritten signature in blue ink that reads "Paul Chang". The signature is written in a cursive, flowing style.

Paul Chang  
Administrator-Building