

AFFORDABILITY AND CHOICE TODAY (A•C•T) STREAMLINED APPROVAL PROCESS PROJECT

Case Study

Adoption of the National Building Code in Prince Edward Island

**Construction Association of Prince Edward Island
Charlottetown, Prince Edward Island**

Prepared for:

Federation of Canadian Municipalities

Canadian Home Builders' Association

Canadian Housing and Renewal Association

Canada Mortgage and Housing Corporation

Prepared by:

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Ottawa, Ontario

May 1994

This case study was funded by Canada Mortgage and Housing Corporation, but the views expressed are the personal views of the authors and the Corporation accepts no responsibility for them.

FOREWORD

The project documented in this case study received funding assistance under the Affordability and Choice Today (A•C•T) Program. A•C•T is a joint initiative, managed by the Federation of Canadian Municipalities, the Canadian Home Builders' Association, and the Canadian Housing and Renewal Association, together with the funding agency Canada Mortgage and Housing Corporation. The A•C•T Program is administered by the Federation of Canadian Municipalities.

A•C•T, which was launched in January 1990, was designed to foster changes to planning and building regulations and residential development approval procedures in order to improve housing affordability, choice and quality.

Through A•C•T, grants are awarded to municipalities, private and non-profit builders and developers, planners and architects to undertake innovative regulatory reform initiatives in municipalities across Canada. Three types of projects are awarded grants under the A•C•T Program: Demonstration Projects, Streamlined Approval Process Projects, and Case Studies (of existing initiatives).

- *Demonstration Projects* involve the construction of innovative housing that demonstrates how modifications to planning and construction regulations can improve affordability, choice and quality.

- *Streamlined Approval Process Projects* involve the development of a method or an approach that reduces the time and effort needed to obtain approvals for housing projects.
- *Case Study* grants are awarded for the documentation of existing regulatory reform initiatives.

Change and innovation require the participation of all the players in the housing sector. A•C•T provides a unique opportunity for groups at the local level to work together to identify housing concerns, reach consensus on potential solutions, and implement action. Consequently, a key component of A•C•T-sponsored projects is the participation and cooperation of various players in the housing sector in all phases of each project, from development to realization.

All projects awarded a grant under the A•C•T Program are documented as case studies in order to share information on the initiatives and the benefits of regulatory reform with other Canadian communities. Each case study discusses the regulatory reform initiative, its goals and the lessons learned. Where appropriate, the cost savings resulting from modifications in various planning, development, and construction regulations are calculated and reported.

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PROJECT OVERVIEW

Prince Edward Island has not adopted the National Building Code (NBC), and the province does not have an equivalent code in place, a situation which has produced a number of problems. Many homes built in P.E.I. do not meet minimum health and safety standards, even though many builders voluntarily adhere to the NBC and some agencies provide inspection services for specific programs. In addition, many P.E.I. builders believe that the lack of a consistent industry norm has created an unfair bidding process and has reduced opportunities to compete on the mainland.

Over the last decade, periodic attempts have been made by various segments of the P.E.I. residential construction industry to rectify the situation by encouraging the provincial government to adopt the NBC. However, there has not been a well-focused effort to bring this about.

In 1992, the Home Builders' Sector of the Construction Association of P.E.I. (CAPEI) formed a steering committee to determine the feasibility of adopting the Code and to secure support for its adoption. In fall 1992, CAPEI was awarded an A•C•T grant to undertake a comprehensive study of the advantages, disadvantages and costs associated with adopting the NBC in P.E.I.

An independent consultant, Smith Green & Associates Inc., was retained to carry out the study. The steering committee directed the study and reviewed the resulting findings and recommendations.

The study found that the absence of a building code in P.E.I. leaves a significant number of homeowners unprotected, leads to a number of building defects, and can give an unfair advantage in the bidding process to builders that do not apply the NBC. These findings and a series of recommendations for the implementation and administration of the NBC in P.E.I. are contained in a final report.

In December 1993, CAPEI formally presented the final report to the provincial government, along with letters of support from other organizations that support the adoption of the NBC. CAPEI hopes that this report will encourage the provincial government to reconsider its position on the adoption of the Code.

The adoption of the NBC in P.E.I. would require builders to increase their knowledge of the Code and building practices in general. This should improve housing quality, ensure that homeowners and renters are provided with a minimum standard of health and safety, and reduce the costs associated with maintenance and repair.

1.0 PROJECT DESCRIPTION

1.1 P.E.I. and the National Building Code

Only two provinces in Canada, Prince Edward Island and Newfoundland, have not adopted the National Building Code (NBC) or a similar building code. Of the 89 municipalities in P.E.I., only two, the City of Charlottetown and the Town of Summerside, apply and enforce the NBC. Over the past ten years, repeated efforts have been made by various segments of the P.E.I. construction industry to secure the formal adoption of the NBC, but there has not been a consistent and concerted effort to bring this about.

The National Building Code

The NBC was developed by the National Research Council to provide the construction industry with a guide for minimum health and safety standards for the construction, alteration or rehabilitation of buildings. Requirements unrelated to health and safety are kept to a minimum.

The NBC is reviewed regularly by a series of standing committees representing the diverse interests of the construction industry, including building inspectors, architects, fire officials, engineers and contractors.

Originally, the decision not to adopt the NBC was due primarily to the perception that it would lead to the “over-regulation” of the construction industry. More recently, the following reasons have been given to support this decision:

- The most urgent matters concerning building standards are addressed by other legislation in force in P.E.I., such as the Electrical Code, the Canadian Plumbing Code, the

National Fire Code, and On-site Sewage Disposal System Regulations.

- Implementation of the NBC is beyond the financial capability of the Province and most P.E.I. municipalities unless the cost is passed directly to the consumer.
- Most of the residential properties that have a mortgage are insured by Canada Mortgage and Housing Corporation (CMHC), whose staff carry out random inspections during construction to check for reasonable conformance with the Code.
- The public may perceive that the adoption of a building code would add another level of “red tape.”

Early in 1992, the Home Builders’ Sector of the Construction Association of P.E.I. (CAPEI) established a steering committee¹ to examine the feasibility of adopting the NBC in P.E.I. and to consider how to enlist support for its adoption. Many members of the P.E.I. housing industry believed that “the time was right” to encourage the Province to adopt the NBC. For instance, public safety issues and the development of standards for barrier-free design were under discussion; the new national Energy Code, scheduled for implementation in 1995, had to be incorporated into the NBC; and the provincial government had established a “government reform” process.²

¹ Appendix A contains a list of committee members.

² The basic goal of P.E.I.’s government reform process is to increase the efficiency of government by changing its structure.

The A•C•T project was timely. Many municipalities in P.E.I. are facing amalgamation in another year. Currently Charlottetown and Summerside are the only municipalities that have the NBC in effect; outlying communities that will be amalgamated do not. The Code should be province-wide and not just in pockets.

*—Lou Barry, Chief Inspector
City of Charlottetown*

The adoption of the NBC currently has widespread support in P.E.I. In addition to CAPEI, various other groups have approached the provincial government to encourage the adoption of the Code:

- P.E.I. Building Officials Association
- Association of Professional Engineers of P.E.I.
- Housing and Urban Development Association of Canada, P.E.I. Branch
- P.E.I. Branch Office of CMHC

To have the NBC adopted by the Province would give the industry a set of minimum standards to follow, would create a better bidding environment and would afford the general public, architects, etc. the opportunity to design to or specify work that meets the NBC.

—CAPEI's A•C•T project team

In May 1992, CAPEI was awarded an A•C•T grant to determine the feasibility and potential impact of adopting the NBC in P.E.I. The steering committee,

expanded to include a building inspector from the City of Charlottetown and a commercial builder, directed the study. An independent consultant, Smith Green and Associates Inc., was retained to carry out the study. Smith Green is a management consulting firm serving P.E.I. and the Atlantic Region.

1.2 The NBC Impact Study

1.2.1 Objectives and Scope

By undertaking the A•C•T project, CAPEI aimed to present the Province with a thorough and objective study of the various issues involved in the adoption of the Code. A related objective was to ascertain whether there was industry-wide support for the Code, and if so, to develop a strategy to have it implemented.

The project team addressed the following issues:

- The advantages and disadvantages of adopting the NBC.
- The cost of inspections as a barrier to adopting the Code.
- The applicability of the Code to P.E.I.
- The adequacy of alternative codes already in force in protecting builders, homeowners and the public.
- The best way to implement the NBC.

1.2.2 Study Methodology

The study methodology comprised the following components.

Review of Existing Codes and Inspection Services

A review was conducted of all codes and inspection services cited by the Province as justification for its decision not to adopt the NBC.

Document Review

An analysis was made of available documents and reports bearing on the study issues.

Interviews with Out-of-Province Building Officials

Building officials in the other nine provinces were interviewed to confirm the application of the NBC in their jurisdictions and to record their experiences with its enforcement.

Builder Survey

A random sample of 30 firms in the construction industry in P.E.I. were surveyed to determine their views on adopting the Code. The survey included both members and non-members of

CAPEI; firms in all areas of the province were represented. The distribution of survey respondents, which is contained in Appendix B, appears to reflect a cross-section of the industry.

Interviews with Key P.E.I. Sources

Interviews were conducted with 30 key sources in P.E.I., including industry association and public officials, and representatives of several major construction firms that were not included in the random sample of builders.

Data Analysis and Report Preparation

After the analysis of data collected during the research, survey and interview phases, a preliminary report containing the study findings was prepared for review by the steering committee. Committee input was integrated into a draft report, which was reviewed by the Executive Committee of the Home Builders' Sector of CAPEI.

I found the Committee interesting and active. There was a good range of views and no hesitation on the part of members to express their views and concerns.

—Lou Barry, Chief Inspector
City of Charlottetown

2.0 FINDINGS AND RECOMMENDATIONS

2.1 Study Findings

Study findings, which are documented in *Final Report: Provincial Building Code Study*,³ support the adoption of the NBC in P.E.I. The steering committee believes that, due to the study approach and review process, the report reflects the views of a cross-section of the industry concerning the adoption of the Code. Highlights of the report are presented below.

The absence of the NBC results in inadequate consumer protection

While many established builders in P.E.I. voluntarily apply the NBC, a substantial number of buildings constructed each year do not conform to minimum Code standards. Outside Charlottetown and Summerside, two types of residential buildings, in particular, are not covered by existing inspection provisions:

- apartment buildings
- private homes that do not have either a CMHC-insured mortgage or Atlantic New Home Warranty Corporation (ANHWC) coverage

In these cases, there is little to protect homeowners against flaws resulting from the failure of a builder to conform to

minimum standards. As a result, homebuyers may be subject to a loss of comfort and enjoyment, as well as financial costs that could have been prevented by the application of known and widely accepted residential construction standards.

Buildings not built to Code can experience a wide range of problems

The absence of a code and the accompanying lack of inspection services can result in serious safety consequences for apartment building residents, including loss of life. The serious defects in apartment buildings most frequently identified by building inspectors include the following:

- inadequate fire separations
- combustible plumbing (i.e. plastic pipes)
- hollow-core doors to rooms containing heat sources or fire risk
- absence of self-closing devices on doors located in fire-separation walls, or between built-on garages and living quarters
- no provision for emergency lighting
- insufficient soundproofing between units
- improper exits⁴

Major defects in new homes are frequently overlooked by buyers because of the newness of the home, but they

³ Smith Green & Associates Inc., August 1993. A copy of this report can be obtained (at the cost of \$10) by writing to the Construction Association of Prince Edward Island, P.O. Box 728, Charlottetown, P.E.I. C1A 7L3.

It can also be purchased or obtained on loan from the Canadian Housing Information Centre, 700 Montreal Road, Ottawa, Ontario K1A 0P7, Tel: (613) 748-2367, Fax: (613) 748-6192, TTY: (613) 748-2143.

⁴ The defects discussed exclude problems attributed to poor workmanship. Defects resulting from poor workmanship are not covered by either the NBC or the ANHWC.

become apparent over time. These defects may pose health, safety and financial risks.

The following flaws are most commonly identified in new dwellings:

- undersized joists and sills, creating bowed or sagging floors and chronic floor squeaking
- use of green lumber, leading to the problems listed above as well as door and window jamming
- insufficient insulation
- general use of substandard materials
- application of vinyl siding without the use of sheathing paper
- footings laid before frost is fully out of the ground
- absence of moisture controls and vapour barriers⁵

It is common for construction-related problems to emerge only over time. In 1992, CMHC invested \$1.4 million in Residential Rehabilitation Assistance Program (RRAP) grants to help P.E.I. homeowners to repair their homes, some of which were quite new.

The following construction-related problems in RRAP projects were identified by CMHC inspectors as typical:

- undersized foundation walls, and the absence of footings
- improperly mixed concrete, leading to cracks in basement walls and the risk of flooding

⁵ See also the problems identified in Residential Rehabilitation Assistance Program (RRAP) projects.

- inadequate ventilation
- uninsulated exterior walls, even in relatively new buildings
- unlined chimneys for wood-burning heating appliances
- wet basements, absence of weeping tiles and failure to provide adequately for dry-well drainage or sump pits

The absence of a consistent industry norm can lead to unfair bidding practices

Many career builders believe that the lack of a building code gives “short-term” builders an unfair advantage in the competitive bidding process. Short-term builders may have a practice of not building to minimum health and safety standards in order to win a bid. Most career builders, on the other hand, belong to industry associations or the ANHWC, both of which require that they comply with the NBC.

The NBC is applied across Canada

All provinces except Newfoundland and P.E.I. have either adopted the NBC or have modified the Code to satisfy provincial requirements.

Existing alternative codes and inspection services are insufficient to ensure that the construction industry builds to minimum health and safety standards

For example, CMHC inspections only cover a minority of units constructed in P.E.I. Furthermore, approximately 40 percent of new homes built in P.E.I. each year are not registered with the ANHWC.

The building industry supports Code adoption almost unanimously

In both the builder and key source surveys, most respondents (more than 90 percent) favoured adoption of a building code.

Builders who voluntarily apply the NBC believe their familiarity with the NBC is insufficient

Builders who voluntarily apply the NBC expressed a need for ongoing upgrading courses on the Code.

Most results of the adoption of a building code identified in the study were positive

Positive results frequently cited by survey respondents included fair competition in the building industry, strengthening of the industry in general, and improved housing quality.

Some negatives were identified

Negative effects most frequently identified in the study were increased costs for construction and inspection.

2.2 Recommendations

The steering committee reviewed the study and prepared a list of recommendations for the short- and long-term implementation and administration of the NBC. These are presented below.

Target Date for Implementation

The committee proposed January 1995 for full implementation of the Code in P.E.I. Experience from other provinces has shown that the Code cannot be implemented quickly. Manitoba, for

example, required four to five years to have its code accepted and implemented. The fact that Summerside and Charlottetown already require compliance with the NBC should facilitate implementation in P.E.I.

The committee recommended that, in the intervening period, various activities should take place to prepare for Code implementation, including training homebuilders, drafting the necessary modifications to the NBC to address the particular needs of P.E.I., and preparing administrative policies and procedures.

Cost of Implementing the NBC

The steering committee suggested that the implementation of the NBC could be financed by adding an appropriate charge to the cost of a building permit.

Based on CMHC experience, the average cost of inspections per unit is estimated to be \$362.⁶ The gross annual revenue from the inspection of private dwellings is estimated to be approximately \$83,000.⁷

⁶ The calculation of this figure was based on two inspections per unit, a staff cost of \$80 per hour, an estimate of two hours per inspection, and a travel cost of \$21 per inspection.

⁷ This is an estimate of the revenue obtained in the initial year of Code adoption and is calculated as follows:

• average starts/year	=	650 units
• % non-ANHWC	=	40%
• # requiring inspection	=	260 units
• net fees @ 2 inspections per unit	=	\$ 320
• total fee revenue	=	\$ 83,200

The committee recognized that in the short term a certain portion of initial implementation costs would be borne by the Department of Provincial Affairs, because fee revenues are unlikely to cover the full cost of administration. Administration costs include collecting, controlling and accounting for inspection fees, managing the inspection service and support services and salaries for inspectors.

The committee suggested that, in the long term, the adoption of a building code should provide a greater incentive for builders to join the ANHWC. The ANHWC requires full inspection for at least the first three units built by probationary builders. The consultant anticipated that within two years of code adoption, no more than 10 percent of new construction would be owner-built and hence non-warranted. This would reduce the average number of units to be inspected from 260 to 65 per year.

The committee suggested that an interim contract to provide inspection services be arranged with an existing government agency or private company for the first two years after code adoption. Subsequently, the Province could decide how best to continue to provide inspection services.

Implementing the NBC

The committee proposed that implementation of the NBC be assigned to the Minister of Provincial Affairs, the authority responsible for the control of

building permits in P.E.I. Inspection services could be carried out by CMHC, the Department of Provincial Affairs or a private supplier.

Using the established CMHC service would have the following advantages:

- Greater flexibility in responding to builder requirements.
- Assurance that all inspections would be carried out to the same standards.
- Simplification of implementation and start-up since CMHC inspectors are already familiar with the NBC, and the personalities and conventions of the homebuilding industry.
- Efficiencies in the inspection service which would not be easily achievable in a one-person operation.

It was suggested that it would be unlikely that a private supplier would want to take on this inspection service in light of the relatively small volume of work.

During discussions with the Minister of Provincial Affairs, an alternative approach to industry regulation was raised. It was proposed that, instead of inspecting every residential unit constructed in P.E.I., in some cases the government could permit builders to provide a “letter of compliance.” A letter of compliance is a certificate signed by the builder which states that a particular residential building conforms to the Code. This approach would place the onus on the builder to ensure that a building meets health and safety standards.

3.0 PROJECT BACKGROUND

3.1 P.E.I.'s Homebuilding Industry

The issues faced by P.E.I. as it decides whether to adopt the NBC are different from those faced by other provinces and territories in two important respects:

- A majority of communities cannot afford the cost of adopting the NBC.
- Many residents live in areas that do not have the means of enforcing a code.

The homebuilding industry in P.E.I. is generally unregulated and unlicensed. Although individual trades, such as electricians and plumbers, are regulated in P.E.I.; general contractors are not. It has been said that anyone with a tool-box and a pickup truck can enter the construction business without any formal test of competence.

Home construction involves a number of often highly specialized skills and trades. To produce housing of acceptable quality, all these trades need to be coordinated effectively and correctly, a job usually carried out by the general contractor.

In P.E.I., however, there are many inexperienced, untrained and occasional contractors who are not members of any recognized industry association and who build to their own standards. Except for the ANHWC, there is little to protect the succession of homeowners from errors or incompetence on the part of the original builder.

The Atlantic New Home Warranty Corporation

The Atlantic New Home Warranty Corporation is a private, non-profit organization that enables builders to provide homebuyers with limited warranty protection for defaults in refundable deposits or warranty obligations. The Corporation protects consumers by ensuring that defects in workmanship or materials that occur in the first year of ownership are repaired, and that protection is provided for major structural defects that become apparent in the next four years.

To register with the ANHWC, builders must conform to NBC standards. Currently, 60 percent of all new residential units (excluding apartment units) built in P.E.I. are warrantied by the Corporation.

Approximately 65 builders (less than half of the total number of builders) in P.E.I. are registered in the ANHWC. Applicants are admitted on a probationary basis for a minimum period of one year. During the probationary period, an applicant's construction projects are subject to at least two inspections. Applicants may become regular members when they have fulfilled certain requirements. Projects of members are inspected occasionally.

3.2 Construction Activity in P.E.I.

From 1975 to 1991, there was an average of 773 housing starts per year in P.E.I. Excluding the low-construction years of 1981 (203 starts) and 1982 (248 starts), the annual average was 846 new construction starts.⁸ In recent years, however, there

⁸ Statistics Canada Catalogue 64-002, Housing Starts and Completions, Canada Mortgage and Housing Corporation. These numbers do not include cottage construction, which may range from 100 to 150 units per year.

has been a reduction in the number of annual housing starts. From 1990 to 1992, starts averaged 573 per year.⁹

Figure 1 below presents the number of starts in 1992 by housing type for different areas in P.E.I. These figures indicate that most building activity occurs outside the two municipalities that have adopted the Code. (Charlottetown and Summerside accounted for only about 15 percent of the building permits issued by the Province in 1992.)

Prince Edward Island

In 1991, P.E.I. had approximately 130,000 inhabitants, 60 percent of whom lived in rural areas. The most populous urban area is the City of Charlottetown, which had a population of 15,396 in 1991. Summerside, with 7,474 residents, is the second-largest town. Almost half (45.7 percent) of P.E.I.'s 5,660 square kilometres is devoted to farming.¹⁰

3.3 Construction Association of P.E.I.

CAPEI was established in 1974 to promote all aspects of the construction industry in P.E.I. The Association has approximately 180 members in six active sectors:

- general contractors
- electrical trades
- suppliers
- mechanical trades
- finish/general trades
- homebuilders

In addition, associate membership is offered to others involved in the residential construction industry in P.E.I., such as government employees, architects, planners and engineers.

Figure 1. Building Permits Issued by Housing Type, 1992

	Single-Family Dwellings	Duplexes	Apartment Units	Row Housing	Total
Charlottetown	5	2	71	3	81
Summerside	9	4	18	—	31
Other Serviced Areas	167	22	59	—	248
Unserviced Fringe	59	4	—	—	63
Rural Areas	180	—	—	—	180
Total	420	32	148	3	603

Source: Smith Green & Associates Inc.

⁹ CMHC Regional Office, Charlottetown, 1993.
¹⁰ P.E.I. Department of Finance, *Province of Prince Edward Island: Nineteenth Annual Statistical Review 1992*, March 1993.

4.0 REGULATORY REFORM INITIATIVES AND IMPACT ON COST, CHOICE AND QUALITY

After the study was completed, CAPEI sent letters to various organizations involved in the housing industry in P.E.I. requesting their support for the adoption of the NBC. Letters of support were received from many organizations¹¹.

The final report on the study, along with the letters of support, was formally presented to the Province in December 1993. The report reflects the experience and views of a cross section of the residential construction industry in P.E.I. and indicates that a majority of people involved in the industry support Code adoption.

The adoption of the NBC in P.E.I. would, most importantly, lead to improved quality of housing. Builders would have to increase their knowledge of building code standards and of building practices in general, which would provide home-

owners and renters with at least a minimum standard of health and safety for their dwellings. Improved quality of construction may increase construction costs slightly but would also lead to long-term savings for property owners through reduced replacement, maintenance and repair costs.

Adopting the Code would also encourage the application of standards for barrier-free design, which would provide greater housing choice for those with disabilities.

Furthermore, the implementation of the Code should strengthen the residential construction industry by removing financial incentives associated with building substandard housing. It would also increase the sense of professionalism in the industry by encouraging homebuilders and trades to improve their qualifications.

¹¹ Appendix C contains a list of organizations that have sent letters of support (as of January 1994).

APPENDICES

APPENDIX A: STEERING COMMITTEE MEMBERSHIP

Lou Barry
Chief Inspector
City of Charlottetown

Norman Finlayson
Executive Officer
CAPEI—Home Builders' Sector

Francis Reid
General Manager
CAPEI

Darrel Smith
Manager—Technical Resources
CMHC

Nelson Snow
Principal
Fitzgerald & Snow

Ken Tierney
(current Committee Chair)
Owner
Qualico Homes

Jim Trainor
(former Committee Chair)
Owner
Trainor Contracting

J. E. Green
(Project Consultant)
President
Smith Green & Associates Inc.

APPENDIX B: PROFILE OF BUILDER SURVEY RESPONDENTS

Regional Distribution

Prince County	5
Queens County	20
Kings County	5

Years in Business

1 to 5	4
6 to 10	2
11 to 15	8
16 to 20	10
over 20	4
not stated	2

Type of Business

General Construction	17
Home Construction	10
Supplier	2
Siding Contractor	1

Size of Operation

Average Year-round Staff	6.8
Average Year-round Staff (minus the three largest employers)	3.5
Median Year-round Staff	3.0
Average Seasonal Staff	11.3
Average Seasonal Staff (minus the three largest employers)	8.0
Median Seasonal Staff	9.5

APPENDIX C: LETTERS OF SUPPORT

As of January 1994, letters of support for the adoption of the NBC in P.E.I. have been received from the following organizations:

- Architects' Association of Prince Edward Island
- Atlantic New Home Warranty Corporation
- Atlantic People's Housing Ltd.
- Canada Mortgage and Housing Corporation
- Canadian Home Builders' Association
- Canadian Paraplegic Association
- City of Charlottetown
- Federation of Prince Edward Island Municipalities
- Holland College—Industrial Research Assistance Program
- P. E. I. Real Estate Association
- Prince Edward Island Council of the Disabled, Inc.
- Town of Summerside