ICFMA
INSULATING CONCRETE FORMS MANUFACTURERS ASSOCIATION

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November 5, 2026

The Honourable Julie Dabrusin, P.C., M.P.
Minister of Environment, Climate Change and Nature
House of Commons
Ottawa, Ontario K1A 0A6

Dear Minister Dabrusin:

Re: Budget 2026, the SHIFT program and the circular economy for plastics

On behalf of the Insulating Concrete Forms Manufacturers Association (ICFMA), I am writing about two Budget 2026 measures delivered by Environment and Climate Change Canada that matter to our members, and to ask for a meeting with the officials responsible for them.

ICFMA represents the companies that manufacture insulating concrete forms (ICF) in Canada and the United States. ICF are interlocking blocks of expanded polystyrene (EPS), made in a factory and stacked on site, then reinforced with steel and filled with concrete. The result is a highly insulated, durable wall that cuts the energy a building uses for its whole life. Our members manufacture ICF systems at plants in Quebec, Ontario, Alberta and British Columbia.

Budget 2026 proposes $400 million over seven years, starting in 2027-28, to renew the Green Industrial Facilities and Manufacturing Program as the Strategic High-efficiency Industrial Facilities Transition (SHIFT), to de-risk energy-saving technology at industrial and manufacturing facilities, including small- and medium-sized enterprises (Chapter 1, pages 139 and 140). We welcome it. EPS manufacturing uses steam and electricity, and our members' plants are exactly the kind of mid-sized facilities that can cut energy use with the right equipment. We ask that SHIFT's eligibility thresholds and application process be within reach of plants of this size, and that ICFMA be consulted as the program is designed so we can bring it to our members.

Budget 2026 also proposes $76 million over four years, starting in 2027-28, for Environment and Climate Change Canada, the National Research Council and Fisheries and Oceans Canada to renew measures that reduce plastic waste and increase circularity, including the development of regulations (Chapter 4, page 250). EPS in an ICF wall is not single-use packaging. It is a durable building material that stays in the wall for the life of the building. Our members already practise circularity in their plants and are always looking to improve. We ask that any regulations distinguish durable construction products from single-use plastics, and that ICFMA be consulted early, so that the rules are built on accurate information about how our products are made and used.

I will call your office in the coming weeks to follow up. In the meantime, I can be reached at jfacette@icf-ma.org or 613.850.2669.

Sincerely,

Jim Facette
Executive Director
Insulating Concrete Forms Manufacturers Association (ICFMA)

c.c. Mollie Johnson, Deputy Minister of Environment and Climate Change