ICFMA
INSULATING CONCRETE FORMS
MANUFACTURERS ASSOCIATION

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November 5, 2026

Mr. Mitch Davies
President
National Research Council of Canada
1200 Montreal Road
Ottawa, Ontario K1A 0R6

Dear Mr. Davies:

Re: Budget 2026, the National Model Codes and common standards for modern methods of construction

I am writing to introduce the Insulating Concrete Forms Manufacturers Association (ICFMA) and to ask for a meeting with you or the officials leading the National Research Council's work on the National Model Codes and the new common standards for modern methods of construction.

ICFMA represents the companies that manufacture insulating concrete forms (ICF) in Canada and the United States. ICF are interlocking blocks of expanded polystyrene, made in a factory and stacked on site, then reinforced with steel and filled with concrete. ICF is not new to the Code. Prescriptive requirements for ICF have been part of Part 9 of the National Building Code of Canada since 2005 and were expanded in the 2020 edition, and in March 2024 ICFMA published its Prescriptive ICF Design Tables for Part 9 Buildings in Canada.

Budget 2026 proposes $67.7 million over four years, starting in 2027-28, and $101.2 million in future years, to modernise housing data and establish common standards for modern methods of construction, and confirms that the NRC will provide more timely updates to the National Model Codes (Chapter 3, page 203). This builds on the Spring Economic Update, which provided $41.9 million over five years to the NRC, the Standards Council of Canada and ISED for Model Code updates, a performance-based approval pathway for modular and panelised systems, and faster review of prefabricated products (Chapter 2, page 98).

Our concern is one of scope. The Spring Update names engineered wood as an example of the flexible building options the Codes should support. ICF is not mentioned in either document. If the common standards are written around volumetric modular units and wood panels, factory-made, site-assembled systems such as ICF could be left outside the framework that will shape how Canada builds for the next decade.

We have three requests. First, that the common standards be performance-based, so that any building system is judged on speed, quality, durability and building performance rather than on format or material. Second, that ICFMA have a place in the working groups or advisory committees that draft the standards and the approval pathway. Third, an update on where the performance-based approval pathway stands and how a non-wood system would be assessed through it.

We have written separately to Innovation, Science and Economic Development Canada about the Strategic Response Fund stream for modern methods of construction. The two pieces of work are closely linked, and we would like ICF to be treated consistently in both.

I will call your office in the coming weeks to see whether a meeting can be arranged. 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)