

Established in 1889, the Ontario Association of Architects (OAA) is the self-regulating body for the province's architecture profession. It governs the practice of architecture and administers the Architects Act in order to serve and protect the public interest.

Submitted via the CSA Group Public Review Site

July 10, 2026

Re: Public Review - CSA S478:26: Durability in buildings (New Edition)

To Whom It May Concern:

The Ontario Association of Architects (OAA) continues to monitor and respond to various proposed changes to Canadian Standards Association (CSA) Standards. In its role of serving the public interest, the Association undertook a review of the proposed draft of CSA Standard S478:26, Durability in Buildings. The Association is pleased to see CSA has included extensive climate considerations in its proposal.

Based on its review of the proposed draft of CSA Standard S478:26, the OAA submits the following items for CSA to consider.

- 1. The definition of “designer”:** As currently written, it is unclear if the definition of “designer” refers to an individual practice, the prime consultant and subconsultants, or to the prime consultant and all the owner's other consultants. By clarifying this, the CSA can better ensure that responsibilities are assigned to the appropriate party.

The current wording may be interpreted as requiring the designer to determine the durability implications of deficiencies created by others, even where the designer lacks contractual authority, detailed technical information, or involvement in the corrective work. For example, the draft requires the “designer” to log changes or deficiencies that could affect estimated service life. However, contractors, suppliers, fabricators, and delegated designers are often the parties responsible for creating, correcting, and evaluating such deficiencies. The party proposing or implementing the deficient or corrective work should be the one responsible to ensure durability requirements continue to be satisfied.

The OAA is concerned the definition of “designer” may not be assigning responsibilities to the appropriate parties. That terminology is particularly vague about the role of the contractor, the advocate Architect, and the commissioning agent. The OAA encourages CSA to consider whether any of these parties would be better suited to take on some of the responsibilities that appear to be assigned to the “designer” by default.

- 2. Clarification about the applicability of the Standard to different project typologies:** The OAA notes with some concern that, as currently written, the proposed new edition of CSA S478, Durability in Buildings, does not include constraints related to building size, type, occupancy, or complexity.

While this may be dependent on if and how S478:26 is referenced in Ontario's Building Code, the OAA submits that clarification in the Standard



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may be helpful to provide guidance when applied to the Code. In particular, the OAA recommends that CSA consider including further detail about how the Standard may be scaled down from a highly complex building (e.g. a new hospital) to a simpler building (e.g. a single-family house), and whether it makes sense to scale down given the overhead involved in the process as currently defined in the proposal.

The Association strongly believes the Standard would benefit from scalability provisions and recommends CSA consider constraining the application of this Standard based on factors such as building size, type, occupancy, or complexity.

Further, as currently written, Annex A.6 of the Standard assumes the designer is retained for construction contract administration, including office and field services. While this may be the case for some projects, there may also be projects where:

- a designer is not retained for the construction phase;
- a different designer is retained for the construction phase than for the design phase; or
- an Architect or Licensed Technologist is not required and may not be retained for general review even if they prepared the design.

The OAA encourages CSA to consider how the requirement for construction review is applied in these instances. If constraints related to building size, type, occupancy, or complexity are made explicit in the Standard, this may also help clarify questions about responsibilities related to and administration of Construction Review.

- 3. Omission of mechanical and electrical systems:** The OAA notes the Standard explicitly excludes the “durability of mechanical systems, electrical systems, and services in buildings,” yet the capacity and ability to upgrade these services is fundamental to designing for durability and resilience. The OAA believes this scope gap, along with the limits imposed by municipal infrastructure capacities, inhibits the practical application of the Standard.

For example, if an HVAC system cannot be upgraded, it may prove challenging for a building’s energy efficiency to be improved. As another example, without upgrades to the electrical supply to a building, the building will not be able to provide for now-ubiquitous electrical vehicle recharging.

The Association encourages CSA to explore the inclusion of the “durability of mechanical systems, electrical systems, and services in buildings” as a key part of the new edition of CSA S478.

- 4. Assignment of responsibilities to key parties involved in a project:**



As the new edition of CSA S478 is currently written, it appears there is some confusion regarding roles and responsibilities during the construction phase of a project.

To strengthen the proposed new edition of CSA S478: Durability in Buildings, the OAA encourages CSA to consider clarifying and more clearly aligning roles related to design, commissioning, maintenance, and construction throughout the Standard. For example, CSA may consider making it explicit that the owner is accountable for establishing the durability strategy and allocating responsibilities to project participants based on their contractual role, authority, expertise, and control.

CSA standards are an important reference tool for licensed OAA members to ensure their designs meet building code requirements, and construction complies with the contract documents. The OAA appreciates the opportunity to provide comments on proposed changes to CSA S478:26 and, in upholding its responsibilities to serve the public interest, stands ready to work alongside CSA to advance recommendations that strengthen this and other CSA Standards.

If you would like to discuss this submission, please reach out at your convenience.

Yours truly,

A handwritten signature in black ink, appearing to read 'Lara McKendrick', written in a cursive style.

Lara McKendrick, Architect, OAA
MRAIC
President

