March 11, 2022

Building and Development Branch
Ministry of Municipal Affairs and Housing
777 Bay Street
Toronto, ON
M5G 2E5

Dear Sir or Madam,

Re. Proposed Changes for the Next Edition of Ontario’s Building Code (ERO #019-4974)

Thank you for the opportunity to comment on proposed changes to Ontario’s Building Code. We, the 43 undersigned organizations, urge you to include provisions that would reduce bird collisions with buildings, based on the Canadian Standards Association A460:19 Bird-friendly building design standard. By mandating bird-friendly building construction measures in the Building Code, Ontario could significantly reduce the vast number of birds that die needlessly each year.

It is estimated that every year, about **25 million birds are killed** by colliding with windows in Canada.¹ FLAP Canada has documented birds from 173 species – including 24 species at risk – colliding with buildings in the Greater Toronto Area alone.

There are proven, affordable solutions to this problem. In 2019, the Ministry of Environment, Conservation and Parks funded the development of the Canadian Standards Association A460:19 Bird-friendly building design standard. However, the standard remains voluntary in Ontario.

The Building Code should be revised to incorporate the Bird Collision Mitigation Strategies from CSA A460:19, including the appropriate use of visual markers, specifications for window glazing and glass railings, and building-integrated structures. By mandating bird-friendly building construction measures, Ontario could significantly reduce bird mortality. In so doing, it could make meaningful progress on its stated goal of protecting species and supporting conservation efforts to preserve Ontario’s rich biodiversity (Made-in-Ontario Environment Plan).

We trust that you will seriously consider the benefits of incorporating strategies from the CSA A460:19 standard into the next edition of Ontario’s Building Code.

Yours sincerely,

---

Elizabeth Churcher  
Corresponding Secretary  
Quinte Field Naturalists

Angus Inksetter  
President  
Saugeen Nature

David Euler  
President  
Sault Naturalists

Paul Harpley  
President  
South Lake Simcoe Naturalists

Mark Cranford  
President  
South Peel Naturalists' Club

Terry Crabe  
President  
Stratford Field Naturalists

Peter Beckett  
President  
Sudbury Naturalists

Marilyn Murray  
Chair  
The Lennox and Addington Stewardship Council

Ellen Schwartzel  
President  
Toronto Field Naturalists

Gabriel Evans-Cook  
President  
University of Guelph Wildlife Club

Ray Metcalfe  
Chair  
Upper Ottawa Valley Nature Club

Janet Ozaruk  
President  
Waterloo Region Nature
Chris Leys
Past President
West Elgin Nature Club

Frank Godfrey
President
Willow Beach Field Naturalists

Gloria Marsh
Executive Director
York Region Environmental Alliance

Sylvia Bowman
Conservation Director
York Simcoe Nature Club