



November 14, 2023.

Brandy Cox  
Deputy Minister  
Ministry of Municipal Affairs  
18th Floor, 10155 102 Street  
Edmonton, Alberta, T5J 4G8  
Canada

Via email: [Brandy.Cox@gov.ab.ca](mailto:Brandy.Cox@gov.ab.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Brandy,

We are writing to you on behalf of the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI). Founded in 1968, HRAI is Canada's national non-profit trade association for the heating, ventilation, air conditioning and refrigeration (HVACR) industry, representing over 1,150 member companies across the country. Our members include manufacturers, wholesalers and contractors who collectively employ tens of thousands of skilled trade professionals across the country and contribute more than \$12B annually to the Canadian economy.

On October 5, 2023, the U.S. Environmental Protection Agency published its final Technology Transitions Rule under the AIM Act consistent with the Kigali Amendment to the Montreal Protocol, of which Canada is a signatory. The intent of this rule is to expedite the transition to lower global warming products. The rule prohibits the manufacturer and import of products containing certain restricted HFCs by January 1, 2025.

Hydrofluorocarbons, or HFCs, are high global warming potential substances developed as replacements for ozone-depleting substances (ODS) in the refrigeration and air conditioning, aerosols, fire suppression, and foam blowing sectors.

Our members are ready for the transition to lower global warming potential refrigerants and are currently retooling their factories to manufacture new equipment that conforms to updated design standards allowing for the use of these new refrigerants. Provincial building codes, however, are not ready for this transition since they do not reference updated standards to permit the installation of these new mildly flammable refrigerants such as A2L refrigerants. The adoption of the next edition of the CSA B52 Mechanical Refrigeration Code will permit the installation of these new lower global warming potential refrigerants.

The final publication of the 13<sup>th</sup> Edition of the CSA B52 Mechanical Refrigeration Code is expected to be released by early next year. However, according to the typical timeline followed by the provinces, the 2025 National Building Code will not be adopted by the provinces until mid-2027. Since the National Building Code references the B52 Mechanical Refrigeration Code,



this misalignment between the 2025 National Building Code, and the transition to lower global warming potential refrigerants may compound a potential supply chain disruption in the Canadian heating and air conditioning market.

A survey of our distribution members has verified that most AC units currently shipped and sold in Canada are produced in the United States or Mexico. These same suppliers have indicated that Canada is not a large enough market for these factories to produce a Canada only product. A supply shortage of these products will limit the availability of cooling products while inflating the price of legacy equipment.

Since manufacturers are reorganizing their operations to meet the EPA's January 1, 2025 manufacture and import compliance date, it is imperative that the transition to lower global warming potential products does not disrupt industry supply chains for HVAC equipment across Canada.

To permit the installation of A2L-charged equipment and avoid any potential market disruption, all provinces and territories need to adopt the next edition of the CSA B52 Mechanical Refrigeration Code before January 1, 2025.

As the Deputy Minister for the Ministry of Municipal Affairs in Alberta and a sitting member of the Canadian Table for Harmonized Construction Codes Policy, your support in this endeavour at the November 29, 2023 meeting of the CTHCCP will help ensure a successful and non-disruptive transition to lower global warming potential refrigerants.

If you have any questions or concerns about this letter, please do not hesitate to contact me.

Sincerely,

Sandy MacLeod  
President and CEO

cc HRAI Manufacturers Board of Directors  
Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs



November 14, 2023.

Byron Rafuse  
Deputy Minister  
Department of Municipal Affairs and Housing  
8<sup>th</sup> Floor, Maritime Centre, 1505 Barrington Street  
Halifax, NS, B3J 2M4  
Canada

Via email: [dm-finance@novascotia.ca](mailto:dm-finance@novascotia.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Byron,

We are writing to you on behalf of the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI). Founded in 1968, HRAI is Canada's national non-profit trade association for the heating, ventilation, air conditioning and refrigeration (HVACR) industry, representing over 1,150 member companies across the country. Our members include manufacturers, wholesalers and contractors who collectively employ tens of thousands of skilled trade professionals across the country and contribute more than \$12B annually to the Canadian economy.

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As the Deputy Minister for the Department of Municipal Affairs and Housing in Nova Scotia and a sitting member of the Canadian Table for Harmonized Construction Policy, your support in this endeavour at the November 29, 2023 meeting of the CTHCCP will help ensure a successful and non-disruptive transition to lower global warming potential refrigerants.

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Sincerely,

Sandy MacLeod  
President and CEO

cc HRAI Manufacturers Board of Directors  
Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs



November 14, 2023.

Gail Boland  
Assistant Deputy Minister  
Digital Government and Services Branch  
100 Prince Phillip Drive  
St. John's, NL, A1B 4J6  
Canada

Via email: [gailboland@gov.nl.ca](mailto:gailboland@gov.nl.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Gail,

We are writing to you on behalf of the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI). Founded in 1968, HRAI is Canada's national non-profit trade association for the heating, ventilation, air conditioning and refrigeration (HVACR) industry, representing over 1,150 member companies across the country. Our members include manufacturers, wholesalers and contractors who collectively employ tens of thousands of skilled trade professionals across the country and contribute more than \$12B annually to the Canadian economy.

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As the Assistant Deputy Minister for the Digital Government and Services Branch of Newfoundland and Labrador and a sitting member of the Canadian Table for Harmonized Construction Policy, your support in this endeavour at the November 29, 2023 meeting of the CTHCCP will help ensure a successful and non-disruptive transition to lower global warming potential refrigerants.

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Sandy MacLeod  
President and CEO

cc HRAI Manufacturers Board of Directors  
Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs



November 14, 2023.

Haiqa Cheema  
Assistant Deputy Minister,  
Office of Housing and Construction Standards and Multiculturalism and Anti-Racism  
PO BOX 9236 STN  
Victoria, BC, V8W 9J1  
Canada

Via email: [Haiqa.Cheema@gov.bc.ca](mailto:Haiqa.Cheema@gov.bc.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Haiqa,

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As the Assistant Deputy Minister for the Office of Housing and Construction Standards and Multiculturalism and Anti-Racism in British Columbia and a sitting member of the Canadian Table for Harmonized Construction Codes Policy, your support in this endeavour at the November 29, 2023 meeting of the CTHCCP will help ensure a successful and non-disruptive transition to lower global warming potential refrigerants.

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Sincerely,

Sandy MacLeod  
President and CEO

cc HRAI Manufacturers Board of Directors  
Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs





November 14, 2023.

Ian Stewart  
President, National Research Council of Canada  
Co-Chair, Canadian Table for Harmonized Construction Codes Policy  
1200 Montreal Road, Building M-58  
Ottawa, Ontario, K1A 0R6  
Canada

Via email: [Iain.Stewart@nrc-cnrc.gc.ca](mailto:Iain.Stewart@nrc-cnrc.gc.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Ian,

We are writing to you on behalf of the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI). Founded in 1968, HRAI is Canada's national non-profit trade association for the heating, ventilation, air conditioning and refrigeration (HVACR) industry, representing over 1,150 member companies across the country. Our members include manufacturers, wholesalers and contractors who collectively employ tens of thousands of skilled trade professionals across the country and contribute more than \$12B annually to the Canadian economy.

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Sandy MacLeod  
President and CEO

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Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs



November 14, 2023.

Jamie McDonald  
Deputy Minister  
Department of Housing, Land and Communities  
Sullivan Building, 16 Fitzroy Street  
Charlottetown, PE, C1A 7N8  
Canada

Via email: [jevmacdonald@gov.pe.ca](mailto:jevmacdonald@gov.pe.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Jamie,

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As the Deputy Minister for Department of Housing, Land and Communities in PEI and a sitting member of the Canadian Table for Harmonized Construction Policy, your support in this endeavour at the November 29, 2023 meeting of the CTHCCP will help ensure a successful and non-disruptive transition to lower global warming potential refrigerants.

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Sincerely,

Sandy MacLeod  
President and CEO

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Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs



November 14, 2023.

Laura Gareau  
Deputy Minister  
Department of Municipal and Community Affairs  
3 Town Square  
Norman Wells, NT, X0E 0V0  
Canada

Via email: [Laura.Gareau@gov.nt.ca](mailto:Laura.Gareau@gov.nt.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Laura,

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Sincerely,

Sandy MacLeod  
President and CEO

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Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs



November 14, 2023.

Laurier Donais  
Deputy Minister  
Ministry of Government Relations  
10<sup>th</sup> Floor, 1855 Victoria Avenue  
Regina, Saskatchewan, S4P 3T2  
Canada

Via email: [Laurier.Donais@gov.sk.ca](mailto:Laurier.Donais@gov.sk.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Laurier,

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As the Deputy Minister for the Ministry of Government Relations in Saskatchewan and a sitting member of the Canadian Table for Harmonized Construction Codes Policy, your support in this endeavour at the November 29, 2023 meeting of the CTHCCP will help ensure a successful and non-disruptive transition to lower global warming potential refrigerants.

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Sincerely,

Sandy MacLeod  
President and CEO

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Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs



November 14, 2023.

Lori Kimball  
Deputy Minister  
Department of Community and Government Services  
P.O. Box 1000, Station 200  
Iqaluit, NT, X0A 0H0  
Canada

Via email: [lkimball1@gov.nu.ca](mailto:lkimball1@gov.nu.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Lori,

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To permit the installation of A2L-charged equipment and avoid any potential market disruption, all provinces and territories need to adopt the next edition of the CSA B52 Mechanical Refrigeration Code before January 1, 2025.

As the Deputy Minister for the Department of Community and Government Services in Nunavut and a sitting member of the Canadian Table for Harmonized Construction Policy, your support in this endeavour at the November 29, 2023 meeting of the CTHCCP will help ensure a successful and non-disruptive transition to lower global warming potential refrigerants.

If you have any questions or concerns about this letter, please do not hesitate to contact me.

Sincerely,

Sandy MacLeod  
President and CEO

cc HRAI Manufacturers Board of Directors  
Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs



November 14, 2023.

Martha Greenberg  
Deputy Minister  
Ministry of Municipal Affairs and Housing  
17<sup>th</sup> Floor, College Park, 777 Bay Street  
Toronto, ON, M7A 2J3  
Canada

Via email: [Martha.Greenberg@ontario.ca](mailto:Martha.Greenberg@ontario.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Martha,

We are writing to you on behalf of the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI). Founded in 1968, HRAI is Canada's national non-profit trade association for the heating, ventilation, air conditioning and refrigeration (HVACR) industry, representing over 1,150 member companies across the country. Our members include manufacturers, wholesalers and contractors who collectively employ tens of thousands of skilled trade professionals across the country and contribute more than \$12B annually to the Canadian economy.

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To permit the installation of A2L-charged equipment and avoid any potential market disruption, all provinces and territories need to adopt the next edition of the CSA B52 Mechanical Refrigeration Code before January 1, 2025.

As the Deputy Minister for the Ministry of Municipal Affairs and Housing in Ontario and a sitting member of the Canadian Table for Harmonized Construction Codes Policy, your support in this endeavour at the November 29, 2023 meeting of the CTHCCP will help ensure a successful and non-disruptive transition to lower global warming potential refrigerants.

If you have any questions or concerns about this letter, please do not hesitate to contact me.

Sincerely,

Sandy MacLeod  
President and CEO

cc HRAI Manufacturers Board of Directors  
Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs



November 14, 2023.

Matt King  
Deputy Minister  
Department of Community Services  
307 Black Street  
Whitehorse, YT, Y1A 2N1  
Canada

Via email: [Matt.King@yukon.ca](mailto:Matt.King@yukon.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Matt,

We are writing to you on behalf of the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI). Founded in 1968, HRAI is Canada's national non-profit trade association for the heating, ventilation, air conditioning and refrigeration (HVACR) industry, representing over 1,150 member companies across the country. Our members include manufacturers, wholesalers and contractors who collectively employ tens of thousands of skilled trade professionals across the country and contribute more than \$12B annually to the Canadian economy.

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To permit the installation of A2L-charged equipment and avoid any potential market disruption, all provinces and territories need to adopt the next edition of the CSA B52 Mechanical Refrigeration Code before January 1, 2025.

As the Deputy Minister for the Department of Community Services in Yukon and a sitting member of the Canadian Table for Harmonized Construction Policy, your support in this endeavour at the November 29, 2023 meeting of the CTHCCP will help ensure a successful and non-disruptive transition to lower global warming potential refrigerants.

If you have any questions or concerns about this letter, please do not hesitate to contact me.

Sincerely,

Sandy MacLeod  
President and CEO

cc HRAI Manufacturers Board of Directors  
Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs





Le 14 novembre 2023.

Michel Beaudoin  
Président-directeur général  
Régie du bâtiment du Québec  
255, boulevard Crémazie Est  
Montréal, Québec, H2M 1L5  
Canada

Par courriel : [mb@michelbeaudoin.ca](mailto:mb@michelbeaudoin.ca)

## **RE : Adoption du Code de réfrigération mécanique CSA B52.**

Monsieur,

Nous vous écrivons au nom du Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI) [*Institut canadien du chauffage, de la réfrigération et de la climatisation*]. Fondée en 1968, HRAI est l'association commerciale nationale à but non lucratif du Canada pour l'industrie du chauffage, de la ventilation, de la climatisation et de la réfrigération (HVACR). Cette association représente plus de 1150 entreprises membres au pays. Nos membres comprennent des fabricants, des grossistes et des entrepreneurs qui emploient collectivement des dizaines de milliers de professionnels qualifiés au pays et apportent plus de 12 G\$ par an à l'économie canadienne.

Le 5 octobre 2023, l'Environmental Protection Agency (EPA) des États-Unis a publié sa règle finale en matière de transition technologique en vertu de la *Loi AIM*, conformément à l'amendement de Kigali au Protocole de Montréal, dont le Canada est signataire. L'objectif de cette règle est d'accélérer la transition vers des produits ayant un impact moins important sur le réchauffement climatique. La règle interdit la fabrication et l'importation de produits contenant certains HFC d'ici le 1er janvier 2025.

Les hydrofluorocarbures, ou HFC, sont des substances à fort potentiel de réchauffement climatique développées pour remplacer les « substances appauvrissant la couche d'ozone » (SACO) dans les secteurs de la réfrigération et de la climatisation, des aérosols, de la lutte contre les incendies et du soufflage de la mousse.

Nos membres sont prêts à transitionner à des réfrigérants ayant un faible potentiel de réchauffement climatique et réorganisent actuellement leurs usines pour fabriquer de nouveaux équipements qui se conforment aux normes de conception actualisées permettant l'utilisation de ces nouveaux réfrigérants. Les codes du bâtiment provinciaux ne sont cependant pas prêts pour cette transition puisqu'ils ne font pas référence à des normes actualisées permettant d'installer ces nouveaux réfrigérants légèrement inflammables tels que les réfrigérants A2L. L'adoption de la prochaine édition du Code de réfrigération mécanique CSA B52 permettra l'installation de ces nouveaux réfrigérants à faible potentiel de réchauffement climatique.



La publication finale de la 13e édition du Code de réfrigération mécanique CSA B52 devrait se faire au début de l'année prochaine. Toutefois, selon le calendrier habituel suivi par les provinces, le Code national du bâtiment 2025 ne sera adopté par les provinces qu'à la mi-2027. Étant donné que le Code national du bâtiment fait référence au Code de réfrigération mécanique B52, ce décalage entre le Code national du bâtiment de 2025 et la transition vers des réfrigérants à faible potentiel de réchauffement climatique pourrait aggraver une éventuelle perturbation de la chaîne d'approvisionnement sur le marché canadien du chauffage et de la climatisation.

Une enquête auprès de nos membres distributeurs a vérifié que la plupart des unités de climatisation actuellement expédiées et vendues au Canada sont produites aux États-Unis ou au Mexique. Ces mêmes fournisseurs ont indiqué que le Canada ne constitue pas un marché suffisamment important pour que ces usines puissent fabriquer un produit exclusivement canadien. Une pénurie de ces produits limitera la disponibilité des produits de refroidissement tout en gonflant le prix des équipements existants.

Étant donné que les fabricants réorganisent leurs opérations pour respecter la date de conformité de l'EPA en matière de fabrication et d'importation du 1er janvier 2025, il est impératif que la transition vers des produits à faible potentiel de réchauffement climatique ne perturbe pas les chaînes d'approvisionnement de l'industrie pour les équipements HVAC au Canada.

Pour permettre l'installation d'équipements chargés A2L et éviter toute perturbation potentielle du marché, toutes les provinces et tous les territoires doivent adopter la prochaine édition du Code de réfrigération mécanique CSA B52 avant le 1er janvier 2025.

En tant que président-directeur général de la Régie du bâtiment du Québec et membre siégeant de la Table stratégique canadienne sur l'harmonisation des codes de construction (TSCCHC), votre soutien dans cette démarche lors de la réunion du 29 novembre 2023 de la TSCCHC contribuera à assurer une transition réussie vers des réfrigérants ayant un faible potentiel de réchauffement climatique.

Pour toute question ou préoccupation au sujet de cette lettre, n'hésitez pas à me contacter.

Cordialement,

Sandy MacLeod  
Présidente et cheffe de la direction

cc Conseil d'administration des fabricants HRAI  
Martin Luymes, V.-P., Relations avec le gouvernement et les parties prenantes  
Stephen Chartrand, Affaires règlementaires



November 14, 2023.

Mike Comeau  
Assistant Deputy Minister  
Department of Justice and Public Safety  
Marysville Place, Floor 3, P.O. Box 6000  
Fredericton, NB, E3B 5H1  
Canada

Via email: [Mike.Comeau@gnb.ca](mailto:Mike.Comeau@gnb.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Mike,

We are writing to you on behalf of the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI). Founded in 1968, HRAI is Canada's national non-profit trade association for the heating, ventilation, air conditioning and refrigeration (HVACR) industry, representing over 1,150 member companies across the country. Our members include manufacturers, wholesalers and contractors who collectively employ tens of thousands of skilled trade professionals across the country and contribute more than \$12B annually to the Canadian economy.

On October 5, 2023, the U.S. Environmental Protection Agency published its final Technology Transitions Rule under the AIM Act consistent with the Kigali Amendment to the Montreal Protocol, of which Canada is a signatory. The intent of this rule is to expedite the transition to lower global warming products. The rule prohibits the manufacturer and import of products containing certain restricted HFCs by January 1, 2025.

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To permit the installation of A2L-charged equipment and avoid any potential market disruption, all provinces and territories need to adopt the next edition of the CSA B52 Mechanical Refrigeration Code before January 1, 2025.

As the Assistant Deputy Minister for the Department of Justice and Public Safety In New Brunswick and a sitting member of the Canadian Table for Harmonized Construction Policy, your support in this endeavour at the November 29, 2023 meeting of the CTHCCP will help ensure a successful and non-disruptive transition to lower global warming potential refrigerants.

If you have any questions or concerns about this letter, please do not hesitate to contact me.

Sincerely,

Sandy MacLeod  
President and CEO

cc HRAI Manufacturers Board of Directors  
Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs



November 14, 2023.

Ryan Klos  
Deputy Minister  
Ministry of Consumer Protection and Government Services  
209 Legislative Building, 450 Broadway  
Winnipeg, MB, R3C 0V8  
Canada

Via email: [dmmti@manitoba.ca](mailto:dmmti@manitoba.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Ryan,

We are writing to you on behalf of the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI). Founded in 1968, HRAI is Canada's national non-profit trade association for the heating, ventilation, air conditioning and refrigeration (HVACR) industry, representing over 1,150 member companies across the country. Our members include manufacturers, wholesalers and contractors who collectively employ tens of thousands of skilled trade professionals across the country and contribute more than \$12B annually to the Canadian economy.

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As the Deputy Minister for the Ministry of Consumer Protection and Government Services in Manitoba and a sitting member of the Canadian Table for Harmonized Construction Codes Policy, your support in this endeavour at the November 29, 2023 meeting of the CTHCCP will help ensure a successful and non-disruptive transition to lower global warming potential refrigerants.

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Sincerely,

Sandy MacLeod  
President and CEO

cc HRAI Manufacturers Board of Directors  
Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs





November 14, 2023.

Tim Lewis  
Assistant Deputy Minister  
Office of the Deputy Solicitor General  
25 Grosvenor Street  
Toronto, ON, M7A 1Y6  
Canada

Via email: [Tim.Lewis@ontario.ca](mailto:Tim.Lewis@ontario.ca)

**RE: Adoption of CSA B52 Mechanical Refrigeration Code.**

Dear Tim,

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If you have any questions or concerns about this letter, please do not hesitate to contact me.

Sincerely,

Sandy MacLeod  
President and CEO

cc HRAI Manufacturers Board of Directors  
Martin Luymes, VP, Government and Stakeholder Relations  
Stephen Chartrand, Regulatory Affairs