

MS comments Template

QF003 Reference #: CQ/2026/0173	Document: Draft CARICOM Application Document – CARICOM Regional Energy Efficiency Building Code (DCAD – CREEBC) - Revision
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	MB¹	Clause No./ Subclause No./ Annex / Figure / Table	Line Number	Type of comment²	Comment (justification for change) by the MB	Proposed change by the MB	Consultant Feedback	RTC observations on each comment submitted
1	TT	General		Ed	The draft CARICOM Application Document – CARICOM Regional Energy Efficiency Building Code (DCAD-CREEBC) contains requirements for both commercial and residential buildings. The structure of the draft standard intermixes chapters for residential and commercial buildings. The interchanging of requirements for residential and commercial buildings can result in user confusion and code implementation errors. It is recommended the DCAD-CREEBC follow a similar structure to the International Energy Conservation Code (IECC) and create distinct sections for the provisions of commercial and residential buildings (i.e. all chapters relating to commercial buildings are placed in one section and all the chapters relating to residential buildings are placed in another section)	Restructure the DCAD-CREEBC using the structure of its base document, IECC 2024, where the requirements for commercial and residential buildings are in distinct separate sections, as shown below: - Commercial Buildings Chapter 1-6 (CE) - Residential Buildings Chapter 1- 6 (RE)	RPT to decide on the format, to be discussed. We need to check: 1. Check for IECC subscription again, check the format in IECC 2024. The current code is in IECC 2024 format. 2. If we need to restructure as per this comment, it can be done once all the chapter level comments are addressed. 3. To be discussed in RPT for restructuring	Accepted. A note will also be added for mixed use building.
2	TT	General		Te	Trinidad and Tobago does not have an enforcement agency/authority having jurisdiction for the inspection/regulation of energy efficient buildings. Throughout the DCAD-CREEBC, there are multiple requirements referring to approvals by the Authority Having Jurisdiction. For example, C401.3 requires: <i>“A permanent building thermal envelope certificate shall be completed by an approved third-party inspection agency or individual. Such certificate shall be posted in the utility room or near the HVAC equipment.”</i>	Revise the definitions for approved, approved agency and approved party as follows: Approved Acceptable to the code official <i>or building client (in cases where an authority having jurisdiction has not been established)</i> <i>Note: acceptance by the building client is only</i>	Can be done, the proposed definitions to be validated by CROSQ and the member states based on the structure in each MS Each MS can define their AHJ once the code is in adoption stage for the member state	Not accepted. This is will be addressed in the implementation roadmap for the code.

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					In the case of C401.3 and similar requirements, building contractors in Trinidad and Tobago are unable to fulfil the requirements, as an authority does not exist to provide the necessary approvals.	<i>applicable in cases where the relevant authority having jurisdiction does not exist.</i> Approved Agency An established and recognized agency that is regularly engaged in conducting tests or furnishing inspection services, or furnishing product certification, where such agency has been approved by the code official <i>or building client (in cases where an authority having jurisdiction has not been established)</i> <i>Note: acceptance by the building client is only applicable in cases where the relevant authority having jurisdiction does not exist.</i> Approved Party An individual or organization recognized by the authority having jurisdiction <i>or building client (in cases where an authority having jurisdiction has not been established)</i> to complete		

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						compliance documentation. This may include a trained local inspector, certified energy auditor, or qualified builder who can accurately certify the building thermal envelope. <i>Note: acceptance by the building client is only applicable in cases where the relevant authority having jurisdiction does not exist.</i>		
3	TT	General		ed	Unit notation is inconsistent throughout the code, with some sections presenting imperial units first followed by SI equivalents in parentheses, and other sections using the opposite order.	Standardize the unit notation order used throughout the code	Can be done	Accepted. SI equivalents will be first with imperial in parenthesis throughout.
4	TT	General		ge	Critical to the successful adoption/implementation of the Revised Energy Efficiency Building Codes are Compliance and Enforcement. These can be facilitated via the application of Artificial Intelligence, as follows: Automated Code Compliance Checking: AI can scan building designs (e.g., Revit/CAD files) against complex, updated code requirements to instantly flag potential violations, reducing human error and accelerating approval times.		To be discussed with RPT on current capabilities to use AI in checking building plans, regulatory analysis, and compare performance gaps.	Noted.

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					- Generative AI for Regulatory Analysis: AI-powered tools (like the ICC's AI Navigator) can interpret complex, lengthy energy codes, allowing architects and engineers to quickly find relevant requirements. - Closing the "Performance Gap": AI helps bridge the difference between "as-designed" efficiency and "as-operated" reality by identifying operational inefficiencies that regulations should address.			
5	TT	General (applies throughout the document – “C102.2 Other Laws”; point #2 of section “Historic buildings”; section “Owner”; R301.2 “Warm humid counties”)	Throughout the document	ed.	Some wording and assumptions are inherited based on the geographic and legal context of the USA. CARICOM adoption would benefit from consistent terminology for Caribbean jurisdictions and explicit localization notes for feasibility and enforcement. (Instances of the use of terminology such as, state, county, federal can be found on p. 9, “C102.2 Other Laws”; p. 16 point #2 of section “Historic buildings”; p. 18 section “Owner”; p. 36 R301.2 “Warm humid counties”)		To be discussed during RPT meeting	Accepted. Terminology will be updated to read “national”
6	TT	General		ed	The DCAD-CREEBC includes terminology not applicable to the CARICOM Region. It is recommended that the terminology used in the document be updated to reflect regional vernacular.	Replace “local, state or federal law” with “local law” throughout the document	Can be done	Accepted. Terminology will be updated to read “national”
7	TT	General		ge	The DCAD-CREEBC is designed for use in the CARICOM Region, the phrase “Caribbean Context” used in requirements/explanations introduced in the draft code are unnecessary and should be deleted.	Delete phrase “Caribbean Context” throughout the document	Can be done	Accepted.

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8	TT	Contents / Table of Contents	Pg. iv (line n/a)	ed	The TOC shows duplicated/unclear headings (e.g., “C101.4 Compliance” and “C101.5 Compliance” both labelled as compliance), and inconsistent capitalization (NOTICE/MEANS/STOP). This reduces usability and can cause mis-citation. Headings are also missing from the TOC (e.g., “C101.2 Scope”; “C101.3 Intent”, etc.)	Correct TOC labels to match clause intent (consider renaming C101.5 to “Compliance materials” if applicable), remove duplicate headings, insert missing headings and standardize capitalization in headings (sentence case or title case consistently).	Can be done	Accepted.
9	SR	Scope	N/A	te	Need to include Customs enforcement as a mechanism for technical compliance.	Add a specific chapter or annex regarding "Border Enforcement and Conformity Assessment".	To be discussed during RPT meeting as the enforcement is not in scope of code. Also, code is for designing, whereas enforcement shall be under regulatory framework for each member state	Not accepted. Enforcement does not fall within the scope of the code. Will be addressed by the implementation roadmap and the regulatory framework for each member state.
10	SR	Chapter 1-6	N/A	ge	Lack of clarity on required documentation for clearance of goods.	Define the "Certificate of Conformity (CoC)" as a mandatory document for high-energy-consuming goods.	Depends upon the COC in each MS. To be discussed with MS and decide during RPT meeting	Not accepted. Enforcement does not fall within the scope of the code. Will be addressed by the implementation roadmap and the regulatory framework for each member state.

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11	TT	Table 1	Pg 44	ed	To improve user understanding and usability of the document, it is recommended that the compliance paths described in Table 1 and Table 2, also be visually represented using a flow chart or decision tree.	Include a flow chart or decision tree to visually depict the compliance path options for commercial and residential buildings	Can be done	Accepted.
12	TT	C101.1	Pg. 9, 14	ed.	The clause names the code as the “2025 CARICOM Regional Energy Efficiency Building Code,” while the document’s cover and overall revision labelling throughout the document indicate CREEBC 2024. This can create ambiguity in citation and legal adoption instruments.	Revise C101.1 to use a single, consistent year designation across the document (either “CREEBC 2024” everywhere, or update all to “CREEBC 2025”). Ensure the citation format is stated explicitly (e.g., “CARICOM Regional Energy Efficiency Building Code (CREEBC), 2024”)	Its CREEBC 2024. To be changed in draft code	Accepted. Will be updated to reflect year of publication.
13	TT	C101.2	Pg. 9	ed.	On page 2 of the draft Code (“CREEBC”) we are told that Chapter 1 Scope and Administration “contains provisions for the application, enforcement and administration of subsequent requirements of the code.” In this regard, it is important to note that in the 2024 IECC, there are two sets of Scopes which differ in the Chapters on either the Commercial Provisions or the Residential Provisions. The document would benefit from the clause using the exact wording of the 2024 IECC Scope that the drafters of the CREEBC would like to see reflected. See for example Item C401.1 “Scope” at page 43 of the draft	Wording should be selected based on the appropriate Scope definition of the 2024 IECC. However, if the intention is to be encompassing, the wording should be reflected accordingly, perhaps merging the two Scopes from the 2024 IECC at C101.2 and R101.2.	The CREEBC is an umbrella code, with the individual chapters establishing the applicable technical requirements. The implementation roadmap that will follow finalization of the CREEBC will address how the code is to be applied and implemented.	The final CREEBC will include all the wording from the 2024 IECC

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					Code/CREEBC which is clearly stated. This will guard against any ambiguity. This is particularly important as Chapter 1 appears to apply to the entire CREEBC, which is itself split into sections or Chapters referring to Commercial Provisions and Residential Provisions.		I recommend that we retain the current general scope approach for Chapter 1 and, if needed, clarify that its administrative and enforcement provisions apply to the CREEBC as a whole.	
14	TT	C102.4.1		te	In cases where there are conflicts between the voluntary requirements of the CREEBC and national laws/regulations/codes approved by the relevant authority having jurisdiction, there may be confusion amongst users on which requirement should be applied. To avoid user confusion and improve usability of the code, a statement indicating where there are conflicts between the CREEBC and national laws or codes approved by the authority having jurisdiction, the provisions of the law/authority having jurisdiction shall apply.	Update clause as follows: <i>Where conflicts occur between the provisions of this code and national laws and codes approved by the authority having jurisdiction, national laws and codes approved by the authority having jurisdiction shall apply.</i> Where conflicts occur between provisions of this code and referenced codes and standards, the provisions of this code shall apply.	Can be done	Where a conflict exists between the provisions of this Code/Standard and any applicable national law, regulation, or code adopted or approved by the Authority Having Jurisdiction (AHJ), the national law, regulation, or code shall apply. Where a conflict exists between the provisions of this Code/Standard and a referenced code or standard, the provisions of this Code shall apply, unless the applicable provision of this Code expressly states otherwise.
15	TT	C101.2.1	Page 9	ed.	There are no Appendices in the draft Code/CREEBC. The wording appears to be a holdover from the different versions of the IECC.	If there are no Appendices to be added,	Can be done	Accepted.

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					For example, it is noted that the IECC 2024 has Appendices, is it the intention to use or adopt any of these said Appendices?	this reference should be removed.		The Appendices in IECC 2024 will be referenced.
16	TT	C101.4.1	Pg. 9	ed.	The actual statement from the 2018 IECC, which applies to both Commercial Provisions and Residential Provisions should be clearly stated to avoid any ambiguity. In addition, the terminology “mixed residential and commercial buildings” from the IECC, should be used rather than “mixed occupancy”.	Mixed residential and commercial buildings. Wording to be lifted from C101.4.1/R101.4.1 of the 2018 IECC.	Our base code is 2024 and the terminology is as per it. Need to discuss on significance of changing this to 2018. To be discussed during RPT meeting.	The code will maintain the terminology used by IECC 2024. The definition for mixed occupancy will include “mixed residential and commercial buildings”
17	TT	C101.5.1	Pg. 9	ed.	To avoid ambiguity, the wording of the 2018 IECC should be used.	Use wording of 2018 IECC as it is the same for both the Commercial and the Residential Provisions.	Our base code is 2024 and the terminology is as per it. Need to discuss on significance of changing this to 2018	The wording in the IECC 2024 will be used.
18	TT	C102.1.1	Pg. 9	ed.	Given that the wording of the IECC 2018 and IECC 2024 clauses on this issue are the same and treat with the same issue as “mixed occupancy” at C101.4.1 discussed above, it may be preferable to choose the 2024 IECC which is the more recent code to use as a reference in the draft Code/CREEBC.	Use wording of 2024 IECC as it is more recent and has the same wording as the 2018 IECC.	Our base code is 2024 and the terminology is as per it. Need to discuss on significance of changing this to 2018. Comment 16, 17 are conflicting with comment 18 To be discussed during RPT meeting	The wording in the IECC 2024 will be used.
19	TT	C101.4.1	Pg. 9	ed.	The actual statement from the 2018 IECC, which applies to both Commercial Provisions and Residential Provisions should be clearly stated to avoid any ambiguity. In addition, the	Mixed residential and commercial buildings. Wording to be lifted from	Repeated comment. (Page 8 has same comment)	

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					terminology “mixed residential and commercial buildings” from the IECC, should be used rather than “mixed occupancy”.	C101.4.1/R101.4.1 of the 2018 IECC.		
20	TT	C202	Pg. 11	ed.	The version, 2018 or 2024 of the IECC should be specified to avoid ambiguity, especially if there are differences between these versions.	The wording should specify which version of the IECC is being used.	IECC 2024 is used as base code. We can put a disclaimer regarding changes from 2018 and 2024	The wording in the IECC 2024 will be used.
21	TT	C202		ge	Glossary expansion	Add Caribbean-specific terms (e.g., “jalousie windows,” “concrete block construction”) to ensure clarity.	Caribbean specific glossary is to be added. Sharing a glossary also for approval from RPT	Accepted. Additional glossary terms to be recommended and finalized by RPT members.
22	TT	C202		te	In Trinidad and Tobago, the Town and Country Planning Act defines a “garage” as follows: “garage” means a place where motor vehicles are bought and sold, stored, repaired and maintained and is a place used for light industrial purposes The definition for “parking garage” provided in the DCAD-CREEBC conflicts with Trinidad and Tobago’s national legislation. The RPT is asked to verify if a similar conflict occurs for other Member States. If a similar conflict occurs, it is recommended that the term “parking garage” be changed to “car port”.	If a similar conflict occurs in other CARICOM Member States, change the term “parking garage” to “car port”	Depends upon RPT feedback Definitions can come in appendices If here are any other definitions to be added, RPT to confirm	Not accepted Definition does not conflict with that of other Member states
23	TT	C202		ed	Approved Party is defined as follows: An individual or organization recognized by the authority having jurisdiction to complete	Change “trained local inspector” to “trained building inspector”	Depends upon RPT feedback	Local Inspector: individual who is

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					compliance documentation. This may include a trained local inspector, certified energy auditor, or qualified builder who can accurately certify the building thermal envelope. - Clarify type of “local inspector”		Definitions can come in appendices If here are any other definitions to be added, RPT to confirm	deemed competent and authorized by the AHJ to inspect, verify or document compliance with this code.
24	TT	C202		ed	Thermal bridge is defined as follows: An element or interface of elements within the building thermal envelope that has higher thermal conductivity than surrounding materials, creating a path of least resistance for heat transfer and thereby reducing the effectiveness of insulation and overall energy performance. To bring more clarity on the term Thermal Bridge consider changing “surrounding materials” to “adjacent”	Change “An element or interface of elements within the building thermal envelope that has higher thermal conductivity than surrounding materials, creating a path of least resistance for heat transfer and thereby reducing the effectiveness of insulation and overall energy performance.” To “An element or interface of elements within the building thermal envelope that has higher thermal conductivity than <i>adjacent</i> materials, creating a path of least resistance for heat transfer and thereby reducing the effectiveness of insulation and overall energy performance	RPT to decide Also what is the basis of changing this definition? Is this for local adoption, this can be changed at MS level.	Comment withdrawn

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25	TT	Table C301.1			The source and currency of the precipitation data provided in Table C301.1 is unknown. Sources with a dated referenced should be provided with the table. Recognizing that there may be changes in weather pattern trends arising from climate change, building designers should be encouraged to contact the local meteorological office for current weather data.	Add a footnote to the table indicating the following: 1. Source and dated reference for the precipitation data provided in the table 2. The following statement “It is recommended that building designers contact their local meteorological office for up-to-date precipitation data and trends.”	This is ok to add	Accepted. The CARICOM Associate Members will be included and notes added.
26	TT	C301	p.22 L3–10	te	Climate zones are based on North America, not Caribbean islands.	Let each country set its climate zones using local weather data.	According to ASHRAE Standard 169 (Climatic Data for Building Design Standards), the Caribbean falls primarily within Climate Zone 1A (Very Hot and Humid), characterized by a tropical wet and dry or tropical rainforest climate	Comment was withdrawn.
27	TT	C301		te	Localized climate data	Expand tables with Caribbean-specific temperature, humidity, and solar radiation profiles rather than relying	ASHRAE Standard 169: Includes station-specific climatic data (such as dry-bulb, wet-bulb temperatures, and wind data) for thousands of	Not accepted. This is addressed in the table footnote “It is recommended that building designers contact their local

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						on generalized “warm humid” zones.	global locations, including major Caribbean islands and territories.	meteorological office for up-to-date precipitation data and trends.”
28	TT	C302.1	p.27 L4	te	Indoor design temperatures does not match tropical comfort levels.	Include guidelines for buildings naturally cooled by breezes.	The code is for Air Conditioned buildings, not for naturally ventilated buildings. ASHRAE 62.1 provides ACPH for AC buildings, not for naturally ventilated buildings	Statement to be inserted from IECC 2018.
29	TT	C303.1.1	p.27 L12– 18	te	Insulation loses effectiveness in hot, humid weather.	Test insulation for performance in humid tropical climates.	Ensure certification of imported insulations. The MS can adopt the testing/certification of insulations at adoption stage. They can ask for certificate from manufacturers whether the insulation is complied with the local climate conditions or not	Not accepted.
30	TT	C401.2.1			Syntax	Change “Table below the compliance options...” to “ <i>The</i> Table below <i>shows</i> the compliance...”	Can be done	Accepted.
31	TT	C401.3			Syntax	Change “The certificate should be stored properly to prevent being damaged due to water or any other weather	To be discussed in RPT. Putting shall means it is not a mandatory criteria and why shouldn’t it be	Accepted.

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						change.” To “ The certificate should be stored <i>to prevent damage from water or weather elements.</i>” Change “Also, certificate must explicitly indicate where air-barrier continuity is not provided and explain the basis for exemption.” To “ <i>Also, the certificate shall explicitly indicate</i> where air-barrier continuity is not provided and explain the basis for exemption”	mandatory, to be discussed during RPT meeting	
32	TT	C401.3		te	C401.3 states: “Consider requiring limited testing or alternative compliance documentation where alterations affect a significant proportion of the envelope or where the space is mechanically cooled/dehumidified, as these conditions increase the importance of airtightness for comfort and moisture control.” It is not clear who is responsible for considering the above recommendations – is the code official, the building designer or the RPT team?	Rephrase the clause below to indicate the entity responsible for considering the recommendation: Consider requiring limited testing or alternative compliance documentation where alterations affect a significant proportion of the envelope or where the space is mechanically cooled/	To be discussed during RPT meeting, regarding defining the responsibility	Accepted. Clause was reworded and will now read as follows: “Limited testing or alternative compliance documentation shall be required where alterations affect a significant proportion of the envelope or where the space is mechanically cooled/dehumidified, as

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						dehumidified, as these conditions increase the importance of airtightness for comfort and moisture control.”		these conditions increase the importance of airtightness for comfort and moisture control.”
33	TT	C403	p.57 L20–40	te	AC system efficiency ratings does not match international standards used in Trinidad and Tobago.	Reference standards commonly used in ISO/EN Caribbean procurement.	The CARICOM Regional Energy Efficiency Labelling Scheme (CREELS) establishes regional energy performance standards and mandatory product disclosures. Developed by the CROSQ (CARICOM Regional Organisation for Standards and Quality), the guidelines apply energy rating labels to key household and commercial appliances to lower regional power costs. Specific standard - Air conditioners (CRS standard 58)	Accepted. CARICOM standards will be referenced throughout.
34	TT	C403.1.5		te	Requirements relating to snow, heating and temperate climate are not applicable to the Caribbean and should be deleted from the DCAD-CREEBC.	Delete requirements for the heated vestibules in C403.1.5 as follows: <i>Heated or cooled vestibules.</i>	Yes can be done	Not Accepted Section remains because it is applicable in some regions.

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					Given the warm climate of the Caribbean, requirements for the heating of vestibules are not applicable.	The heating system for heated vestibules and air curtains with integral heating shall be provided with controls configured to shut off the source of heating when the outdoor air temperature is greater than 7 °C (45 °F). Vestibule heating and cooling systems shall be controlled by a thermostat located in the vestibule configured to limit heating to a temperature not greater than 60°F (16°C) and cooling to a temperature not less than 29 °C (85 °F). Exception: Control of heating or cooling provided by site-recovered energy or transfer air that would otherwise be exhausted		
35	TT	C403.3.2		te	C403.3.2 <i>HVAC equipment performance requirements</i> , specifies the minimum efficiency requirements for various HVAC equipment. The test methods listed in TABLE C403.3.2(3) C403.3.2(4) MINIMUM EFFICIENCY REQUIREMENTS: ELECTRICALLY OPERATED PACKAGED TERMINAL AIR		There is no change suggested by the RPT on this. To be discussed during the meeting if there is	Include undated reference of CRS 59 in the code. Remove SEER2 reference to ACs.

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					CONDITIONERS, PACKAGED TERMINAL HEAT PUMPS, SINGLE-PACKAGE VERTICAL AIR CONDITIONERS, SINGLE VERTICAL HEAT PUMPS, ROOM AIR CONDITIONERS”, does not include ISO 5151, <i>Non-ducted air conditioners and heat pumps — Testing and rating for performance</i> ISO 5151 is the standard test method referenced in the CARICOM Regional Standard, CRS 59:2019, <i>Energy Labelling – Air conditioners – Requirement</i> (these standards define the Minimum Energy Performance values for ACs, and labelling requirements). ISO 5151 also defines the test methods and standard test conditions for determining the Energy Efficiency Ratio (EER) of non-ducted room air conditioners, and also the Coefficient of Performance (COP) for heat pumps. ISO 5151 establishes requirements based on EER, whereas Table C403.3.2(1) specifies SEER2 (at least for the air-cooled AC units, which would largely apply to residential systems). Since there is no direct conversion from EER to SEER2, it is difficult to determine if the values provided in CRS 59 and the draft revised CREEBC are equivalent. One option would be to revise one framework to align with the other; however, this has been an ongoing regional challenge. Jamaica conducts tests based on EER, which formed the basis for		any change proposed to this point.	

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					CRS 59 adopting EER. More recently, however, suppliers have indicated that many imported units are now rated using SEER. Given this shift in the market, this may warrant a broader regional discussion to determine the most appropriate metric going forward and to ensure alignment between the CREEBC and regional energy efficiency labelling standards.			
36	TT	C403.4.1		te	Clause C403.4.1 references “accreditation standards”, see below: Systems serving zones where humidity levels are required to be maintained with precision of not more than ±5 percent relative humidity to comply with applicable codes or accreditation standards or as approved by the authority having jurisdiction. Please provide examples of “accreditation standards”	Include examples of “accreditation standards”	ASHRAE 90.1 and ASHRAE 55 to be referenced here For standard residential and commercial buildings, strict \(\pm 5\%\) relative humidity requirements are highly rare. Most standard codes—like ASHRAE 55 (thermal comfort) and the International Energy Conservation Code (IECC) —recommend a broad target range of 30% to 60% relative humidity without strict penalties for minor swings	Not accepted. The list may be exhaustive, and the term “applicable” would apply to relevant accreditation standards.

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							Commercial Indoor Air Quality (ASHRAE Standard 62.1): While it focuses primarily on ventilation rates, it sets an upper limit of 65% relative humidity for occupied spaces to manage mold and moisture. High- performance systems use this as a baseline to design tight modulation systems.	
37	TT	C403.15		te	C403.15 references test methodologies in the United States of America’s code of federal regulations, see below: Equipment that dehumidifies indoor grow and greenhouse spaces shall be one or more of the following: 1. Dehumidifiers tested in accordance with the test procedure listed in DOE 10 CFR 430 and DOE 10 CFR 430, Subpart B, Appendix X or X1. It is recommended that references to methodologies also approved by the authority having jurisdiction be included in the requirement.	Revise C403.15 as follows: Equipment that dehumidifies indoor grow and greenhouse spaces shall be one or more of the following: 1. Dehumidifiers tested in accordance with the test procedure <i>approved by the authority having jurisdiction or listed</i> in DOE 10 CFR 430 and DOE 10 CFR 430, Subpart B, Appendix X or X1.	Discussion and feedback needed on this. Testing procedures and capabilities to be followed by AHJ are to be discussed	Not accepted. The leading statement states” one or more of the following”. A clause was inserted that applicable laws apply.
38	TT	C405.12		te	Trinidad and Tobago’s main residential voltage is 115/230 V 60 Hz. However, the Automatic Receptacle control described in C 405.12, only	If a similar conflict occurs in other CARICOM Member States, change the clause as follows:	Seems ok to be changed.	Accepted in part.

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					references 125 V receptacles, which is not applicable in Trinidad and Tobago. RPT asked to verify if a similar conflict occurs for other Member States.	At least 50 percent of all 115/230V, 15- and 20-amp receptacles installed in enclosed offices, conference rooms, rooms used primarily for copy or print functions, breakrooms, classrooms and individual workstations, including those installed in modular partitions and module office workstation systems.	Other MS to confirm on the conflict on voltage. Discussed in RPT is required on %.	Clause amended and will now read as follows: At least 50 percent of all 15- and 20-amp receptacles installed in enclosed offices, conference rooms, rooms used primarily for copy or print functions, breakrooms, classrooms and individual workstations, including those installed in modular partitions and module office workstation systems.
39	TT	C405.13.1	5-8	ge	It should be clarified that though the utility meters/monitors the supply of energy to an installation, the energy monitoring requirement for various load categories of a building under the code is the responsibility of the consumer/building owner or his authorized agent and is separate and apart from the metering infrastructure provided by the utility	Specify that this metering requirement is the responsibility of the owner ensuring that consumers know that the utility does not provide those meters.	To be discussed during RPT to check the applicability across MS.	Not accepted. The statement does not refer to the utility. The utility provides only bulk-metering.
40	TT	C405.13.6	Pg. 93	ed.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for such variations. In certain cases, the concepts may not yet be established in specific territories.	Wording should be inserted to make clear that the draft Code/CREEBC cannot override government	Addressed previously. Disclaimer can be mentioned	Accepted.

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						policy except where authorized by statute.		
41	TT	C403.15			Is indoor grow the correct term?		To be checked with base code IECC 2024.	The term is correct.
42	TT	C405.15.2.1	6-14	ge	The Trinidad and Tobago Electricity Commission (T&TEC) only has Power Purchase Agreements for Utility Scale (> 1 MW) Renewable Energy (RE) installations. There is currently no Power Purchase Agreements for Non-Utility Scale (< 1 MW) RE Projects; the RE Generator License applies.	This section should cater for and differentiate between Utility Scale and Non-Utility Scale Renewable Energy Installations.	Other MS to confirm this conflict. Also, the MS can define the non-utility scale projects based on their definitions as defined by electricity commissions and can be reflected while its adoption at MS	Insert the term “where applicable” before clause. Clause will now read as follows: Where applicable, the <i>building owner</i> , as defined in the <i>International Building Code</i> , shall procure and be credited for the total amount of off-site renewable electrical energy, not less than required in accordance with Equation 4-11, with one or more of the following:
43	TT	C405.15.2.1		te	The draft requirement states that the owner may be credited for offsite renewable energy procurement using one of the following options: 1. Physical renewable energy power purchase agreement.	If a similar conflict occurs in other CARICOM Member States, change the clause as follows: Delete all clauses relating to energy credits, physical energy power purchase	Same as above. RPT to provide feedback on conditions at all MS.	Not Accepted Section remains because it is applicable in some regions.

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					2. Financial renewable energy power purchase agreement. 3. Community renewable energy facility. 4. Off-site renewable energy system owned by the building property owner. 5. Renewable energy investment fund. 6. Green retail tariff. The mechanisms referenced above are not available/utilized in Trinidad and Tobago. There are also no national policies or legislation supporting these mechanisms. RPT asked to verify if a similar conflict occurs for other Member States.	agreement, financial renewable energy power purchase agreement, community renewable energy facility, off-site renewable energy system owned by the building property owner, renewable energy investment fund, green retail tariff.		
44	TT	C405.15.3	11	ge	Renewable Energy Certificates as defined in the document “ <i>A market-based instrument that represents and conveys the environmental, social and other nonpower attributes of 1 megawatt hour of renewable electricity generation and could be sold separately from the underlying physical electricity associated with renewable energy resources, also known as energy attribute and energy attribute certificate (EAC)</i> ” and other such related terms have not yet been instituted in Trinidad & Tobago and as such T&TEC is unable to comment on this and related matters.		RPT to suggest changes as required. Discussion required.	Noted.
45	TT	TABLE C405.15.2	Pg. 95	ed.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for	Wording should be inserted to make clear that the draft	Disclaimer is ok to put in	Accepted

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					such variations. In certain cases, the concepts may not yet be established in specific territories.	Code/CREEBC cannot override government policy except where authorized by statute.		
46	TT	C405.15.3		te	Renewable Energy Certificates, energy contracts for delivery or crediting of renewable energy to building sites are not available The mechanisms referenced above are not available/utilized in Trinidad and Tobago. There are also no national policies or legislation supporting these mechanisms. RPT asked to verify if a similar conflict occurs for other Member States.	If a similar conflict occurs in other CARICOM Member States, change the clause as follows: Delete all clauses relating to renewable energy certificates, energy contracts for delivery or crediting of renewable energy to building sites.	To be discussed during RPT meeting. The MS can amend during adoption stage however if the case is same for all the MS then it can be removed. In future, this is to be considered while the code is amended.	Not accepted The mechanisms referenced maintains in other jurisdictions.
47	TT	C405.15.4	Pg. 95	ed.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for such variations. In certain cases, the concepts may not yet be established in specific territories.	Wording should be inserted to make clear that the draft Code/CREEBC cannot override government policy except where authorized by statute.	Same as 45. Disclaimer is ok to put in	Accepted
48	TT	C405.15.4		te	The draft requirement states: The purchase of renewable electricity products shall comply with the Green-e Energy National Standard for renewable electricity products equivalent to five times the amount of total off-site renewable energy calculated in accordance with Equation 4-11.	Replace references to Green-e National Standards with the applicable regional standards.	RPT to suggest the regional specific renewable energy standard. CCREEEF or regional policy, targets, and tracking metrics, the CARICOM counterpart to Green-e's governance model is the Caribbean	Not accepted.

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					Green-e® Renewable Energy Standard is applicable to Canada and the United States is not applicable to the CARICOM Region.		Centre for Renewable Energy and Energy Efficiency (CCREEE). The Framework: They enforce the Caribbean Sustainable Energy Roadmap and Strategy (C-SERMS) and monitor national tracking tools like the CARICOM Energy Report Card (ERC) and the CARICOM Energy Information System to assess regional green power capacity To be discussed during RPT meeting	
49	TT	C405.16	4	te	In addition to IEEE 1547 and UL 1741, IEC 62116 is also currently part (inverter standards) of the RE interconnection requirements and it should therefore also be considered. Additionally, the IEC has a suite of applicable standards for the RE system which ought not to be ignored.		Ok to consider IEC 62116. Where photovoltaic inverter anti-islanding performance is required, compliance with IEC 62116 or an equivalent internationally recognized standard shall be permitted.	Accepted in part. Clause was amended and will now read: “Direct-current-to-alternating-current inverters serving on-site renewable energy systems or on-site electrical energy storage systems (ESS) shall be compliant with IEEE 1547 and UL

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								1741 or any other equivalent internationally recognized standard".
50	TT	C406.1.2		te	Energy credit systems referenced above are not available/utilized in Trinidad and Tobago. There are also no national policies or legislation supporting these mechanisms. RPT asked to verify if a similar conflict occurs for other Member States.	If a similar conflict occurs in other CARICOM Member States, change the clause as follows: Delete clauses relating to energy credit systems	Section C406.1.2 of the 2024 IECC establishes a building-code credit framework through which buildings achieve specified renewable and load-management credits using measures identified in Section C406.3. These credits are a compliance mechanism within the energy code and should not be interpreted as requiring the existence of a national energy-credit trading system or electricity-market mechanism. Recommendation Retain Section C406.1.2 and the renewable and load-management credit framework, but revise the relevant provisions of Section C406.3 to clarify that a measure may be used for compliance only where the associated	Not Accepted Section remains because it is applicable in some regions.

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							technology, programme, tariff, utility arrangement or regulatory mechanism is available and permitted under the applicable jurisdiction. Where a specific credit measure is not available in a Member State, the project should be permitted to achieve the required credits through other applicable measures identified in C406.3, subject to the overall credit requirement	
51	TT	C406.2.2.2		te	This requirement pertains HVAC heating performance and may not be applicable to the CARICOM Region.	Delete clause	Ok to delete The provision is not relevant to the dominant climatic and energy-use conditions of the region and its removal does not compromise the energy-performance objectives of CREEBC	Not Accepted Clause remains because it is applicable in some regions.
52	TT	C406.2.3.6		te	This requirement pertains to shower drain heat recovery/pre-heating of cold water serving building showers and may not be applicable/necessary for the CARICOM Region.	Delete clause	Ok to delete	Accepted

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53	TT	C406.3.1	Pg. 109	ed.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for such variations. In certain cases, the concepts may not yet be established in specific territories.	Wording should be inserted to make clear that the draft Code/CREEBC cannot override government policy except where authorized by statute.	Repeat as 45 Disclaimer is ok to put in	Accepted
54	TT	C406.3.2		te	This requirement includes provisions for earning energy credits. Energy credit systems are not available/utilized in Trinidad and Tobago. There are also no national policies or legislation supporting these systems. RPT asked to verify if a similar conflict occurs for other Member States.	If a similar conflict occurs in other CARICOM Member States, change the clause as follows: Delete requirements relating to energy credits.	Same as 50	Not Accepted Clause remains because it is applicable in some regions.
55	TT	C407.3.1		te	This requirement lists building energy performance documents to be submitted to the “code official”. In Trinidad and Tobago an authority having jurisdiction for energy efficient buildings/ code enforcement agency for energy efficient buildings has not been established. For Member States without an AHJ, how will building designers be able to adhere to this requirement? Is there an alternative provision for cases where a “code official” does not exist?	Update requirement to include provisions for cases where a building code official has not been established.	Ok to update as follows. C407.3.1 to provide that the required compliance documentation shall be submitted to the authority having jurisdiction, permitting authority, designated reviewing authority, or other body identified by the Member State for administration of the CREEBC. Where no specific authority or code official has been designated, the compliance	Accepted

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							documentation shall be prepared by the project design professional or other appropriately qualified person, retained with the project records, and made available to the relevant government authority or designated reviewer when requested. The Member State may subsequently designate the responsible authority or code official through its national adoption and implementation arrangements.	
56	TT	C407.3.2		te	The clause states : The code official shall be permitted to require the following documents... This phrasing can be misleading, with some persons interpreting that the listed documents are the only documents the code official shall be allowed to request. For Member States without an established code official and authority having jurisdiction, please clarify how building contracts can comply with this clause.	Change “The code official shall be permitted to require the following documents...” to “Additional documents which may be required by the code official include...” Update requirement to include provisions for cases where a building code official has not been established.	Ok to amend. Need more discussion during RPT to understand current/future for code official and documentation requirements	Accepted in part. Add 7 th bullet point: Any additional documents which may be required by the code official

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57	TT	C407.5		ed	The DCAD-CREEBC includes two clauses numbered as C407.5	Review and renumber the clauses, as necessary.	Will be reviewed and changed	Accepted
58	TT	C407.5.1		ed	Typo	Change “4Thermal mass” to “Thermal mass”	Will be reviewed and changed	Accepted
59	TT	C408.1	p.115 L12–28	te	Testing requirements may be too hard given local capacity.	Allow a simpler, “tiered” approach for small or medium buildings.	Needs a detailed discussion during RPT meeting	Accepted. Simpler approach will be included for smaller buildings.
60	TT	C409.1		te	C409.1 states: Section C409 should be considered as optional in CREEBC 2024, with the following approach: - Encourage voluntary adoption of TSPR for larger, complex, or government-led demonstration projects. - Retain C409 in the code text as an appendix or optional compliance path, allowing early market players to use it. Defer mandatory enforcement until supporting infrastructure (simulation tools, reference baselines, trained code officials) is established. Please clarify if this section forms part of the draft standard. It seems to be recommendation notes for the RPT which were mistakenly left in the document.	If the note to RPT members was mistakenly left in the draft standard, then the highlighted section should be deleted. If the clause was NOT mistakenly left in the document, it should be re-drafted to indicate the responsible authority having jurisdiction for each of the listed approaches	The note is not left mistakenly. This is an optional clause included with 3 different options. TheMS can define the responsibilities of their AHJ in adoption stage. To be discussed in during RPT meeting.	Accepted. Options will be placed as Notes.

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61	TT	C501.2		te	Alterations and repairs for the energy efficiency/energy conservation of existing buildings may be subject to approvals and design provisions from multiple authorities having jurisdiction (for example: approvals from fire services. electrical inspectorate, etc). To raise user awareness that alterations/repairs relating to the energy efficiency of existing buildings may be subject to inspection and approvals from multiple agencies apart from the code enforcement agency responsible for energy efficient buildings, C501.2 should be updated to include reference to the authority having jurisdiction.	Update as follows: Alterations, repairs, additions and changes of occupancy to, or relocation of, existing buildings and structures shall comply with the provisions for alterations, repairs, additions and changes of occupancy or relocation, respectively, <i>from the authority having jurisdiction, codes approved by the authority having jurisdiction</i> , the requirements in this code and <i>where applicable</i> , in the International Building Code, International Existing Building Code, International Fire Code, International Fuel Gas Code, International Mechanical Code, International Plumbing Code, International Property Maintenance Code, International Private Sewage Disposal Code and NFPA 70.	Ok to change with following. Alterations, repairs, additions and changes of occupancy to, or relocation of, existing buildings and structures shall comply with the applicable provisions of this code and with all other applicable laws, regulations, codes and standards adopted by the authority having jurisdiction or otherwise applicable to the project, including, where applicable, requirements related to building, fire safety, electrical, mechanical, plumbing and other regulated systems. The role and responsibilities of AHJ to be defined by the MS at adoption stage.	Accepted to read as follows: “ Alterations, repairs, additions and changes of occupancy to, or relocation of, existing buildings and structures shall comply with the applicable provisions of this code and with all other applicable laws, regulations, codes and standards adopted by the authority having jurisdiction or otherwise applicable to the project, including, where applicable, requirements related to building, fire safety, electrical, mechanical, plumbing and other regulated systems.”
62	TT	Chapter 4 – Residential Buildings		te.	The requirements for the design and construction of residential buildings provided in the DCAD-CREEBC do not reflect the general	Conduct an in-depth review of Chapter 4- RE and delete clauses not	Can be removed.	Accepted.

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					construction practices in CARICOM. This chapter includes building design requirements not suited for CARICOM, such as heated flooring, heated garages, de-iceing of guttering. The chosen models, and equipment for promoting energy efficiency in residential buildings may not be economically viable and will therefore limit the number of building developers and home owners choosing to construct energy efficient residential houses.	applicable to the Caribbean. For example, delete the following clauses: R402.2.13 Sunroom and heated garage installations R402.5.2 Fireplaces R403.9.4 Freeze protection system controls R403.9.1 Heating outside a building R403.9.2 Snow melt and ice system control R403.9.3 Roof and gutter deiceing controls	Detailed discussion is required during RPT meeting	Maintain fireplaces and delete others.
63	TT	R101.1	Pg. 30	ed. and ge.	There is a disparity between this Title and the Title at clause 101.1 on page 9 of the draft Code/CREEBC. It has also been pointed out that the naming of the draft Code and its year/version is inconsistent within the document.	Use consistent Titles and references to the document, throughout the said document for clarity and correctness.	To be discussed during RPT meeting.	The year will be year of publication.
64	TT	R101.2 Scope. 2024 IECC shall apply.	Pg. 30	ed.	On page 2 of the draft Code (“CREEBC”) we are told that Chapter 1 Scope and Administration <i>“contains provisions for the application, enforcement and administration of subsequent requirements of the code.”</i> In this regard, it is important to note that in the 2024 IECC, there are two sets of Scopes which differ in the	Wording should be selected based on the appropriate Scope definition of the 2024 IECC. However, if the intention is to be encompassing, the wording should be	Ok to address	Addressed in earlier comment.

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					Chapters on either the Commercial Provisions or the Residential Provisions. The document would benefit from the clause using the exact wording of the 2024 IECC Scope that the drafters of the CREEBC would like to see reflected. See for example Item C401.1 “Scope” at page 43 of the draft Code/CREEBC which is clearly stated. This will guard against any ambiguity. This is particularly important as Chapter 1 appears to apply to the entire CREEBC, which is itself split into sections or Chapters referring to Commercial Provisions and Residential Provisions.	reflected accordingly, perhaps merging the two Scopes from the 2024 IECC at C101.2 and R101.2.		
65	TT	R105.2.2 Solar Ready system	Pg. 31	ed.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for such variations. In certain cases, the concepts may not yet be established in specific territories.	Wording should be inserted to make clear that the draft Code/CREEBC cannot override government policy except where authorized by statute.	Ok to address with disclaimers Please note that this is an umbrella code and should leave room for local adoption in each MS accordingly	Addressed in earlier comment.
66	TT	R107.2.6		ed	Improve readability of the proposed clause	Inspections shall verify compliance with this code to confirm insulation type(s)...	Yes, can be done	Accepted
67	TT	R301		te	Localized climate data	Expand tables with Caribbean-specific temperature, humidity, and solar radiation profiles rather than relying on generalized “warm humid” zones.	RPT to decide on the source of such data. If the data is available can be put in.	Addressed in earlier comment. The tables will note that Member States should consult their met offices for current data.

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68	TT	R402		ge	Glossary expansion	Add Caribbean-specific terms (e.g., “jalousie windows,” “concrete block construction”) to ensure clarity.	A Caribbean specific glossary to be updated	RPT members to submit.
69	TT	R402	p.127–134	te	Standard insulation values may not suit concrete buildings.	Allow modelling modeling of building performance instead of fixed rules.	Yes, can be done	Accepted.
70	TT	R402.2.1		ed	Syntax	Change “Recommendation: R30 everywhere as long as it covers the full attic uniformly... to “Recommendation: Use R30 everywhere as long as it covers the full attic uniformly ...”	Ok to address	Accepted.
71	TT	R402.5.1.2			Air leakage testing for residential buildings may not be available from local providers and may be costly. It is recommended that air leakage testing be optional and not a mandatory provision.	Change from a mandatory prescriptive requirement to optional requirement	Ok to address with disclaimers Please note that this is an umbrella code and should leave room for local adoption in each MS accordingly.	Review document to ensure air leakage is mandatory for commercial, optional for residential. Member States to indicate local capacity to do air leakage testing.
72	TT	R404	Pg. 139	ed.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for	Wording should be inserted to make clear that the draft Code/CREEBC cannot	Ok to address with disclaimers	

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					such variations. In certain cases, the concepts may not yet be established in specific territories.	override government policy except where authorized by statute.	Please note that this is an umbrella code and should leave room for local adoption in each MS accordingly.	
73	TT	R404.1.2		ed	The clause used two terms “gated society” and “gated community” to describe the same concept. To prevent user confusion, the same term should be used throughout the code.	Change “gated society” to “gated community”	Ok to change as per Caricom phrasing	Accepted
74	TT	R404.1.3		ed	It is recommended that the requirement be reworded to improve clarity.	Change “Recommendation: Make the values mentioned in table R404.1 discounted by 10% for higher adoptability” to “ <i>To promote adoptability, discount by 10% the values in table R404.1</i> ”	Ok to add	Accepted
75	TT	R405.2		ed	Equation 4.2 is distorted. What is the reference of the energy multipliers listed?	Provide a clearer image of the formula in equation 4.2	Ok	Accepted
76	TT	Tropical Zone	p.36 L5–15	te	Tropical zone doesn’t separate ocean vs. inland climates.	Clarify sub-zones based on humidity, sun, and wind.	Data source to be determined	Comment withdrawn
77	TT	Chapter 6 (CE), Chapter 6 (RE)	p.155–156	ed	Some international standards are hard to access locally.	Explain how to get them through national standards offices.	Responsibility of MS to have accessibility of codes for use.	Noted

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78	TT	COMMUNITY RENEWABLE ENERGY FACILITY	Pg. 13	ge.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for such variations. In certain cases, the concepts may not yet be established in specific territories.	Wording should be inserted to make clear that the draft Code/CREEBC cannot override government policy except where authorized by statute.	Ok to address with disclaimers Please note that this is an umbrella code and should leave room for local adoption in each MS accordingly.	Addressed in earlier comment.
79	TT	FINANCIAL RENEWABLE ENERGY POWER PURCHASE AGREEMENT	Pg. 16	ge.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for such variations. In certain cases, the concepts may not yet be established in specific territories.	Wording should be inserted to make clear that the draft Code/CREEBC cannot override government policy except where authorized by statute.	Ok to address with disclaimers Please note that this is an umbrella code and should leave room for local adoption in each MS accordingly.	Addressed in earlier comment.
80	TT	RENEWABLE ENERGY INVESTMENT FUND (REIF)	Pg. 19	ge.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for such variations. In certain cases, the concepts may not yet be established in specific territories.	Wording should be inserted to make clear that the draft Code/CREEBC cannot override government policy except where authorized by statute.	Ok to address with disclaimers Please note that this is an umbrella code and should leave room for local adoption in each MS accordingly.	Addressed in earlier comment.
81	TT	RENEWABLE ENERGY RESOURCES	Pg. 19	ge.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for such variations. In certain cases, the concepts may not yet be established in specific territories.	Wording should be inserted to make clear that the draft Code/CREEBC cannot override government policy except where authorized by statute.	Ok to address with disclaimers Please note that this is an umbrella code and should leave room for local adoption in each MS accordingly.	Addressed in earlier comment.

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82	TT	Energy credits achieved for the project shall be the sum of the individual measure’s energy credits. Credits are available for the measures listed in this section. Where a project contains multiple building occupancy group	Pg. 97	ed.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for such variations. In certain cases, the concepts may not yet be established in specific territories.	Wording should be inserted to make clear that the draft Code/CREEBC cannot override government policy except where authorized by statute.	Ok to address with disclaimers Please note that this is an umbrella code and should leave room for local adoption in each MS accordingly.	Addressed in earlier comment.
83	TT	International Building Code. Recommendation: The total exterior connected lighting power for residential buildings shall be limited to high-efficacy lighting (≥ 45 lumens per watt) and controlled through automatic switching (e.g., timers, photocells, or motion sensors) for non-essential lighting.	Pg. 139	Ed.	Drafters should recognize that some definitions may not correspond with the policies of individual jurisdictions and should provide for such variations. In certain cases, the concepts may not yet be established in specific territories.	Wording should be inserted to make clear that the draft Code/CREEBC cannot override government policy except where authorized by statute.	Ok to address with disclaimers Please note that this is an umbrella code and should leave room for local adoption in each MS accordingly.	Addressed in earlier comment.

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		A prescriptive power allowance calculation method (as in R404.1.3) shall be considered optional for large-scale multi-family projects only. Compliance can be optional for large-scale multi-family projects only						
84	TT	NEW		te	Smart building provisions	Expand sections on renewable integration to include demand response, smart meters, and building automation systems.	The base code does not have such section. This can be added for each MS basis on their readiness with the current technologies and capabilities to implement them. To be discussed during RPT meeting.	Not Accepted. To be addressed in next CREEBC Review. Member States may include such provisions for their own implementation.
85	TT	NEW		te	Public awareness	Provide simplified homeowner guides explaining how compliance benefits comfort, cost savings, and sustainability	The code does not provide any guidance on implementation. This can be covered in implementation phase by each of the MS.	Not accepted. A guideline document may be developed during the implementation roadmap.

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86	TT	NEW		ge	Executive summary	A concise 2–3-page overview of the major changes from the CREEBC 2018 to CREEBC 2024 would help busy policymakers and practitioners.	To be discussed during RPT meeting.	Accepted. A Summary of Major Changes will be drafted.
87	TT	NEW		te	Concrete blocks and hollow clay blocks are common building materials used in the Caribbean. However, the DCAD-CREEBC does not include metrics to measure the thermal performance of these building materials.	Include R-factor and U-factor values for concrete blocks and hollow clay blocks	The code does not provide any guidelines for measurement of building material performance. The performance of the materials to be provided by the manufacturers	Comment withdrawn. Already addressed.
88	TT	NEW		te	The DCAD-CREEBC includes references to international codes such as the International Building Code, NFPA 70. Where a national code/code approved by the authority having jurisdiction exists, such codes shall take precedence over the respective referenced international standard. To avoid user confusion and improve usability of the document, the DCAD-CREEBC should explicitly state, national codes/codes approved by the authority having jurisdiction shall take precedence over the referenced generic international standards.	Add a new clause C104.2.3 as follows: C104.2.3 Referenced codes and standards approved by the national authority having jurisdiction The CREEBC includes references to international codes. Where the authority having jurisdiction has established national codes or approved codes, the codes approved by	Disclaimer to be stated in Code; Also to note this is an umbrella code and should leave room for local adoption in each MS accordingly.	Addressed in earlier comment.

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						the authority having jurisdiction shall apply.		
89	TT	Page 6	1	te	EER has measurement units and COP is a dimensionless number and this is represented on the technical specifications documents of various cooling systems. The measurement units for EER are BTUh-1/W or BTU /Wh and should be inserted into the table as the measurement unit for EER. EER is the ratio of heat removed in a building space by a cooling system (measured in BTUh-1 or BTU /h) per unit of input power consumed by the cooling system (measured in W [Watts]). COP and EER are essentially the exact same measurement only with different measurement units. For COP, heat removed is actually measured in W (Watts) instead of BTU /h, therefore its measurements units are W/W which ends up as dimensionless. One (1) Watt equals approx. 3.412 BTU/h so the conversion factor between COP and EER in the table is correct.	Insert BTUh-1/W or BTU /Wh into the table as the measurement unit for EER	Ok to add this	Accepted
90	TT	Page 12	10	ge	ASHRAE 90.2 for low-rise residential buildings can be included in this list of definitions since it is mentioned in later parts of the document.	Include definition for ASHRAE 90.2	Ok to add in glossary	Accepted
91	TT	Page 16	4	ed	The definition of Fenestration is very vague. Should include a more detailed definition for Fenestration and vertical fenestration. The definition of fenestration should include keywords such as “the design, arrangement, and installation of all openings in a building's exterior envelope, including windows, doors, skylights, and glazed walls, serving to control light, ventilation, views, and aesthetics”.	Include a more detailed definition for Fenestration.	Ok to add in glossary	Accepted. Definition of fenestration to be added in Definitions.

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92	TT	Page 57 and 58	38	te	Does ASHRAE 90.4 for computer (server) rooms and data centers mention that these spaces require cooling with a higher sensible heat ratio (SHR)? These computer systems often need cooling for high levels of sensible heat (dry heat) and have less need for latent heat cooling (heat from humidity in air). Many times “Comfort” cooling systems like split air-conditioners are used to cool these spaces, however, they are designed for human comfort where the cooling capacity provided would usually be a combination of 70% Sensible heat cooling and 30% Latent heat cooling. Comparatively, computerized electronic systems in computer rooms and data center require cooling capacity which is made up of 90% Sensible heat cooling and 10% Latent heat cooling i.e. a higher sensible heat ratio (SHR). Precision type air-conditioning systems providing higher SHR are the best technology available for server rooms and data centers and are designed specifically for cooling sensitive electronic equipment rather than humans. Precision systems will lower the energy costs for cooling the server room greatly since, as a rule of thumb is that it takes 3 tons of comfort cooling capacity to do the same cooling job as 2 tons of precision cooling capacity. Precision cooling is therefore more energy efficient than comfort cooling when used for electronic/server applications. The customer will have to buy more comfort cooling capacity to do the same job as a precision air conditioning system.	Include recommendations for cooling systems with higher sensible heat ratios (SHR) for computer (server) rooms and data centers.	Ok to include the recommendations for cooling systems with higher SHR for computer/server rooms and data centres. Computer rooms and data centers shall be provided with cooling systems selected based on the calculated sensible and latent cooling loads and the environmental requirements of the information technology equipment. Where the cooling load is predominantly sensible, equipment with a high sensible heat ratio appropriate to the calculated design conditions shall be provided.	Not accepted

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93	TT	Page 63	1	ed	HVAC Air Economizer recommendations are first mentioned here and numerous other times throughout the document, however, this technology is not considered appropriate for warm tropical and humid climates like the Caribbean countries. HVAC economizers are devices designed to use outside air to reduce the load on air conditioning compressors and provide some “free cooling”, but this is only useful when the outside air is cool and dry (low humidity) such as in temperate countries. HVAC Air Economizers generally provide little to no benefit in tropical, humid climates. In these regions, high outdoor humidity often makes the air unsuitable for cooling, resulting in increased energy consumption, moisture problems, and potential mold growth. The outside air for the majority of Caribbean countries contains on average 80% relative humidity throughout the year which is too high to allow this air into buildings for free cooling. When an economizer draws in warm, humid air, the HVAC system must work harder to dehumidify it, which frequently increases energy consumption rather than lowering it. For warm-humid, tropical applications, the cost of installing and maintaining an economizer does not justify the minimal or non-existent energy savings.	Should HVAC Air Economizers be included in this code since they are not an appropriate technology for warm tropical humid countries such as the Caribbean?	This is an umbrella code and should leave room for local adoption in each MS accordingly. Additionally, the code Do not mandate air economizers for the Caribbean hot-humid climate zones; it permits them where demonstrated beneficial and require appropriate high-limit/enthalpy controls where installed.	Not accepted. There are applications where economizer may be used.
94	SR		N/A	te	No explicit link to regional/national customs automated systems.	Include requirements for digital data-sharing of technical parameters in customs systems (e.g., ASYCUDA).	The RPT to decide on this. This can be MS level decision which can be	Not accepted. This does not fall under the scope of the code.

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							specified during adoption stage	
95	SR		N/A	te	Standards need to be updated to match evolving green technologies.	Establish a mechanism for periodic review (every 24 months) of the referenced standards.	RPT to decide on frequency for periodic review of the reference standards. This can be an MS-level decision which can be specified during adoption stage	Standards are reviewed on a periodic basis as required by Good Standardization Practices. Undated references to be used.

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Annex – I

Summary of Major Changes in Proposed CREEBC 2024 as compared to 2018

CREEBC 2024 represents a significant evolution from CREEBC 2018, shifting from a predominantly prescriptive energy code toward a more comprehensive performance-based framework. While several existing envelope requirements are retained for practicality and cost-effectiveness, the revised code introduces stronger compliance, verification, monitoring, and operational performance requirements.

Key Changes

- Updated Technical Foundation**
 - Adoption of the latest international energy-efficiency standards and compliance methodologies.
- Expanded Compliance Pathways**
 - Introduction of multiple compliance options, including prescriptive, performance-based, trade-off, and alternative standards-based approaches.
 - Greater flexibility for designers and developers.
- Stronger Administration and Enforcement**
 - Enhanced provisions for inspections, compliance verification, enforcement authorities, appeals, and permitting processes.
 - Improved mechanisms for code implementation.
- Digital Compliance and Documentation**
 - Introduction of digital document submissions.
 - Expanded requirements for construction documentation, compliance reports, record drawings, and project close-out information.
- Mandatory Commissioning**
 - New commissioning requirements for major building systems, including HVAC, lighting, refrigeration, and service water heating.
 - Ensures systems operate as intended after installation.
- Air Barrier and Airtightness Requirements**
 - Introduction of continuous air barrier requirements.
 - Air barrier design documentation and inspection requirements.
 - Whole-building air leakage testing and performance thresholds.
- Thermal Bridging Assessment**
 - Introduction of thermal bridge calculations using Psi (Ψ) and Chi (χ) factors.
 - Improves assessment of heat transfer through structural connections, junctions, and penetrations.
- Enhanced Building Envelope Performance**
 - Building envelope compliance now considers insulation performance, thermal bridges, air leakage, and solar heat management in a more integrated manner.
- Advanced Daylighting Requirements**
 - Introduction of daylight zones and daylight-responsive controls.
 - Enhanced provisions for skylights and daylight utilisation in large spaces.
- Improved Fenestration Provisions**
 - Inclusion of visible transmittance (VT) requirements.
 - Introduction of provisions for dynamic glazing and advanced fenestration technologies.
- Advanced HVAC Requirements**
 - Introduction of Dedicated Outdoor Air Systems (DOAS), Demand Control Ventilation (DCV), Variable Refrigerant Flow (VRF), energy recovery technologies, and advanced controls.
 - Improved system efficiency and operational performance.
- Fault Detection and Diagnostics (FDD)**
 - Introduction of automated monitoring and fault detection capabilities for building systems.
 - Supports ongoing performance optimisation.
- Enhanced Lighting Controls**
 - Expanded requirements for occupancy sensors, daylight dimming, high-end trim, luminaire-level controls, and functional testing.
 - Increased lighting energy savings.
- Energy Metering and Monitoring**
 - Dedicated requirements for energy metering and monitoring.
 - Supports benchmarking, reporting, and energy management.
- Renewable Energy and Energy Storage Readiness**
 - Introduction of provisions related to renewable energy systems, community renewables, renewable energy procurement mechanisms, and energy storage systems.

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- **Coverage of New Building Types**
 - Inclusion of specific provisions for data centres, refrigeration systems, walk-in coolers, and refrigerated warehouses.
- **Improved Caribbean Climate Adaptation**
 - Updated climate zone definitions and tropical climate provisions tailored to regional conditions and cooling-dominated building performance.

Overall inclusions:

The most significant changes introduced in the CREEBC 2024 are:

1. Mandatory air barrier and airtightness testing requirements for commercial buildings. However its not mandatory for residential buildings.
2. Expanded performance-based compliance pathways.
3. Mandatory commissioning and verification of building systems. And similar pathways for small and medium sized buildings.
4. Advanced HVAC control and energy recovery provisions.
5. Smart lighting and daylight-responsive control requirements.
6. Energy metering and performance monitoring.
7. Renewable energy and energy storage integration.
8. Stronger compliance, inspection, and enforcement mechanisms.

Overall, the proposed code places greater emphasis on **verified building performance, operational efficiency, and long-term energy management**, rather than solely relying on prescriptive design requirements

MS comments Template

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