

To: All Members of AIA Massachusetts
From: John Nunnari
Date: 01/13/2026
Re: **DOER Code Change Proposals (R401–R403 and R408) at 01/13/26 BBRs Meeting**

Presentation Overview (DOER / Ian Finlayson)

DOER staff presented a “Residential – Part I” package of proposed amendments to the base energy code only (applicable to approximately 50 non-stretch communities). The presentation emphasized alignment with the 2024 IECC, minimizing Massachusetts-specific amendments, and responding to new statutory direction requiring BBRs to consider energy efficiency, greenhouse gas reductions, and embodied carbon.

Key framing points included:

- Massachusetts is required to adopt each new IECC edition and may strengthen but not weaken it.
- The goal is greater alignment between the base code and the stretch code, particularly in structure and terminology, even where stringency differs.
- The proposals are intended as a starting point for detailed review by the Energy Advisory Committee (EAC) before returning to BBRs.

Sections R401–R403: Building Envelope / Systems (Residential)

DOER explained that proposals in R401–R403 focus on:

- Carrying forward selected 10th-edition amendments that remain effective and widely used.
- Removing provisions viewed as duplicative or outdated, such as:
 - Allowance of the IECC Zero Energy Appendix (seen as unnecessary given the existence of the Stretch and Specialized Stretch Codes).
 - Legacy grading approaches for insulation that ICC is phasing out.
- Maintaining or refining requirements that have demonstrated value, including:
 - Third-party testing and verification for ducts and ventilation systems.
 - Clear, limited compliance pathways for mechanical ventilation (favoring ASHRAE and HERS-based paths while questioning older alternatives).

The intent is simplification, consistency, and retaining measures shown to improve actual performance without unnecessary complexity.

Section R408: Additional Efficiency Options (“Options Table”)

R408 was presented as a major policy focus of the proposal.

Key points included:

- The “options table” originated in Massachusetts with three options, expanded significantly in later IECC editions.
- The 2024 IECC now includes more than 50 options, with even more anticipated in 2027.
- DOER proposed paring this back to 15 options for Massachusetts, citing:
 - Training and enforcement challenges.
 - Need for consistency and usability.
- R408 is viewed as the logical location to incorporate embodied carbon measures as optional compliance pathways, consistent with recent legislation and anticipated recommendations from the Embodied Carbon Interagency Council.

- All embodied carbon elements would be optional, not mandatory.

Board Discussion

Board members:

- Confirmed that the proposals apply only to the base energy code, not the Stretch or Specialized Stretch Codes.
- Acknowledged the potential cost and affordability impacts, particularly for housing, ADUs, and tiny homes, and encouraged continued exploration of flexible or alternative compliance paths.
- Noted that additional residential sections (e.g., R406) and appendices were still under development and would be brought forward later as “Residential – Part 2.”

No substantive technical debate on the merits of specific R401–R403 or R408 provisions occurred at this stage; discussion focused on process, scope, and next steps.



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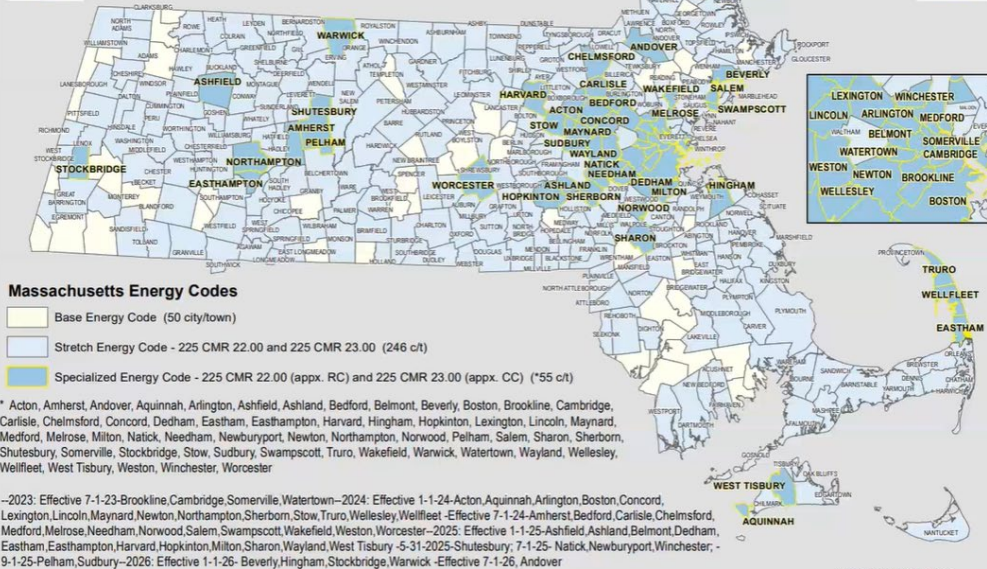
11th edition Residential Energy Code overview for BBRS

Residential new construction – Part-1

January, 2026

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Massachusetts Building Energy Code Adoption by Municipality



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BBRS 11th edition key guidance to Technical Advisory Committees

1. The model codes developed by the International Code Council (“ICC”) shall be adopted with the least Massachusetts amendments as is practical;
2. All Massachusetts amendments from the current 10th edition, shall be evaluated by the Subcommittee to determine, via written justification, why such amendments should be carried forward into the 11th edition;
3. In lieu of using base ICC language, the Subcommittee shall provide written justification for any new amendments proposed for the 11th edition to address state-specific concerns.

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3 additions to BBRS ‘General Scope’ in Feb 2025

Energy Efficiency, reduce GHG & Embodied Carbon

[Mass. General Laws c.143 § 95 | Mass.gov](#)

(a) Uniform standards and requirements for construction and construction materials, compatible with accepted standards of engineering and fire prevention practices, energy conservation, **energy efficiency, reductions in greenhouse gas emissions, reductions in embodied carbon** and public safety.

(c)notwithstanding any general or special law or regulation to the contrary, the board may vary such standards, regulations and requirements and **prefer the treatment of certain types of classes of materials, products and methods of construction, in order to advance reductions in greenhouse gas emissions** needed to meet the statewide greenhouse gas emissions limits and sub-limits established pursuant to chapter 21N;

Amended by [St. 2024, c. 239, §§ 43-44](#), effective February 18, 2025

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10th edition MA amendments to drop:

Remove requirements and simplify the 10th edition language:

1. R401.2 Application.
 - Remove R401.2.4 Appendix RC (Zero Net Residential Energy Provision)
2. R402.5.1 Building Thermal Envelope
 - Remove reference to Grade 1 Installation in Insulation installation Table R402.5.1.1.
3. R403.6 Mechanical Ventilation
 - Remove Option 4: formula with Wind Shield Factor (WSF) and simplify the code



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10th Edition amendments to keep

Residential new construction

1. R401.2 Code compliance options (in addition to prescriptive)
 - HERS, Passive House, stretch code options replace redundant Tropical zone, above code & IECC performance options
2. R403.6 Mechanical Ventilation
 - Allow airflow calculation method using HERS index or ASHRAE 62.2 standards
 - Require testing and verification by a third party
3. Solar ready roofs (2021 to 2024 IECC appendix)
4. Keep and update EV-ready (consistent with stretch code)
5. Streamline R408: Additional efficiency improvements



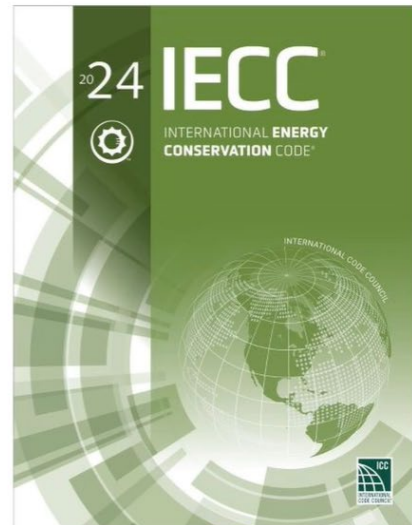
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11th edition: New amendments to consider:

Chapter 4 - Residential

1. R402: Windows (proposal to differentiate, new, replacement & historic bldg. windows)
2. R403: Balanced Ventilation
3. R403: Ducts in Conditioned Space (2027 IECC & NY)
4. R406: ADU & Tiny homes specific HERS option
5. R408*: Simplify Additional Efficiency Requirements
& add 2 embodied carbon options

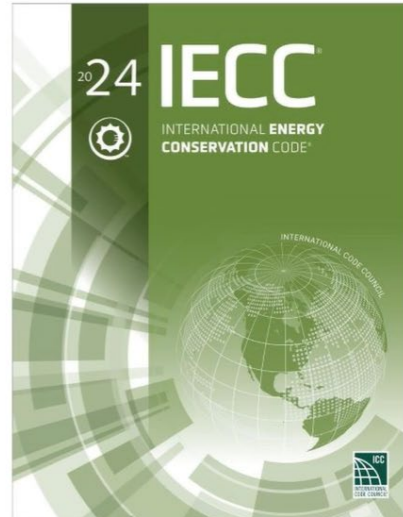


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R408 Additional efficiency requirements

- 2021 IECC – **11 options**,
- 10th edition reduced to **7 options**
- 2024 IECC – **51 options**,
- 11th edition propose **15 options**
 - Including 2 embodied carbon options
- 2027 IECC – **78 options...**



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