

DRAFT 8/11/99

Joint CCBFC/PTCBS Task-Group on
Implementation of a New Code Development System

Report of the Second Meeting
21, 22 June 1999
Winnipeg Man.

Members present

Chair: Bruce Clemmensen
Ann Borooah
Jeannot Fecteau
Chris Fillingham
Tom Makey
Rick McCullough
Dick Miller
Krystyna Paterson
Ross Rettie
Ted Ross
Chuck Sanderson
Bob Thompson
Chris Tye

IRC Staff:

Bob Bowen
Richard Desserud
Luc Saint Martin

Visitors:

Daniel Gagne- City of Winnipeg
Fred Nicholson – Mechanical Contractors
Association of Manitoba
Harold Funk, Manitoba Association of Architects
Alex Campbell- Office of the Fire Commissioner
(Manitoba)
Bill Edwards- City of Brandon
Doug Popowich- Office of the Fire Commissioner
(Manitoba)
Les Treloar- Canadian Advisory Council on
Plumbing

Review of the Report of the 1st Meeting.

The report of the 1st meeting was approved with minor modifications.

Agenda

It was agreed that the agenda for this and future meetings would be organized around the recommendations of the previous Task Group's final Report.

Core Building, Fire And Plumbing Codes

A committee paper on this subject on building codes (AppendixA) was discussed with the following issues raised:

- separate administrative subject areas in the paper
- only refer to subject areas and not objectives (e.g., resource conservation, environmental protection)
- the plumbing code is not a progeny document, but a primary code
- add septic systems to the list of P/T contents

- add information on the process to trigger a progeny document vs. inclusion in the core code or retention at P/T level
- explain what is meant by “housing” in the examples of current NBC contents
- explain why mobile homes/factory built housing is identified as separate P/T content
- some issues such as existing buildings and secondary suites would be considered as significant policy issues
- there is reluctance in most jurisdictions to adding new subject areas to present legislation.
- one province can champion the addition of a new core code subject
- the bulk of the issues identified will probably not be resolved in the 2003 codes.
- although barrier-free design could be best handled as a progeny document, such an arrangement would probably be unacceptable to various groups
- there is benefit in including policy, scope and administrative subject areas that all agree on in core codes even though such provisions may be formulated at the P/T level

A revised version of the committee paper incorporating this discussion will be prepared for the next meeting. Additional material will be prepared for the plumbing and fire codes.

Single Coordinated Public Review

It was reported that at its meeting on May 17 & 18, 1999, the PTCBS discussed what public review activities should be subjected to a coordinated process. There was concern over consultation overload and stakeholder confusion.

Public review activities identified in the present CCBFC work plan include:

- Review of objectives – 2nd & 3rd quarters of 2000
- Technical updating of codes – 2nd & 3rd Quarters of 2000
- Review of draft 2003 code in objective-based format - 2nd & 3rd Quarters of 2000

Some provinces intend to have a technical updating in 2000 which could conflict with the proposed public review of CCBFC technical changes for the 2003 codes. The P/T changes would come into effect immediately, whereas the CCBFC changes will mostly be held until 2003.

The PTCBS was of the view that using the new coordinated process while desirable, shouldn't be rushed and should only be used during this cycle where useful and feasible. The best candidate is the review of objectives, which has caught the interest of senior officials in some provinces.

It was suggested that if the CCBFC technical updating was delayed into 2001, or even later, it might be possible to also include this activity on the list. This also has the benefit of giving the standing committees more time to develop needed changes, and include some technical harmonization among codes. Staff will look into this.

Formal agreement among NRC/CCBFC/and the provinces and territories to commit to coordinated review, should be the least that should be expected out of these discussions.

The Task Group agreed with the position of the PTCBS.

Provincial And Territorial Participation

Efforts to identify a Task Group member from the plumbing community continues. The Chair of the Canadian Advisory Council on Plumbing advises that a permanent representative will be appointed after the August CACP meeting. Mr. Les Treloar. attended this meeting as the interim CACP rep.

It was reported that concerns have been raised that municipal building officials are not represented on the Task-Group. Although efforts have been made to engage building officials in the work of the Task Group, it was agreed that there would be advantages to getting the direct input and participation from this group. There was also concern, however, over ensuring Task Group is kept at a manageable size. It was agreed to leave the matter to the Chair who will discuss the issue with key municipal building officials.

Decision-Making Body

The Task Group discussed the matrix and membership distribution for the CCBFC. Memberships expire on October 31, 1999. There are vacancies, and it is expected that some members will retire or not be re-appointed.

These will be distributed to the provinces and territories with a request that they help recruit candidates for vacancies and any other categories. Task Group members asked that they be copied on any correspondence with the P/T's on this matter.

It was agreed to recommend that a representative of the P/T Advisory Committee should be a member of the CCBFC Chair's selection Committee.

Provincial/Territorial Advisory Committee(s).

It was reported that at its meeting on May 17 & 18, 1999, the PTCBS agreed that it would be preferable to work towards a single Provincial/Territorial advisory voice composed of representatives responsible for building, fire and plumbing regulations. This would provide the CCBFC with the needed high level policy advice, which would likely be needed on a periodic or as required basis. Because of the present state of development of the new process and objective based codes, meetings at this level would probably be needed on an annual basis for the next few years. Once the Objective-based codes are published, there will be a need to reassess how to best manage the process.

It was agreed that staff would draft terms of reference of the P/T Advisory Committee for the next meeting.

The Task Group agreed with the PTCBS recommendation that the next meeting of deputies include representatives responsible for all the codes. It is unlikely that deputies responsible for the 3 codes could be persuaded to attend 3 separate meetings. The CCFM/FC have the matter on the agenda at its meeting in July. Additionally the matter will be discussed at the Canadian Advisory Council on Plumbing at its August meeting.

It was agreed that this Task Group would be the best venue to plan this meeting since it includes the PTCBS Executive, and representatives from the P/T fire and plumbing agencies, as well as NRC.

It was proposed that the meeting occur in February 2000 (working date Feb 16) to fit in with the schedule for public consultation on code objectives, which appears to have particularly caught the interest of senior officials in some provinces. It was agreed that NRC is the most appropriate body to host the meeting.

Decisions will be needed on attendees, date, location, host, chair, agenda and presentations but this can wait until later in the year.

It was agreed that the “context” paper requested by the CCBFC would be an important resource for that meeting. The paper would describe the role of codes in the overall scheme of building quality and consumer protection, including how the various elements interact (warranty, guarantees, market forces, liabilities, professional responsibilities, individual responsibilities, economic choice, the courts, etc.)” IRC is in the process of having the paper prepared.

Resolve Present Technical Differences.

A draft terms of reference for a working group were discussed (Appendix B). There was agreement that individual provinces and territories would be expected to identify technical changes they made to the core codes and where appropriate, submit these as proposed changes to the core code. The process of the new system would treat these proposals as any other, except that standing committees would be asked to give such proposals some priority in the name of harmonization.

All provinces would be invited to participate in this working group.

It was noticed that some provinces had already begun in compiling their technical differences.

Revised Terms of Reference reflecting discussions at the meeting will be prepared for the next meeting.

Multiple Points Of Entry.

Draft procedures for submission of code change proposals were reviewed (Appendix C).

- Although use of the prescribed form was considered desirable, it should not be mandatory provided all the information is provided.
- The language should be friendlier.
- The proposed change form should be available in a manner that could be submitted electronically.
- A procedure is necessary to describe what happens to proposals to change provincial requirements submitted to the CCC.
- It was noted that the procedures only covered actions by the CCBFC in dealing with core codes/progeny documents. Since the system also covers actions at the provinces and territories, procedures describing how non-core code issues are generally dealt with at the P/T level will be necessary. Ann Borooah agreed to have draft procedures prepared.
- The guidelines for submission should give an explanation of what core code subjects are and which proposals (e.g. some administrative requirements) should be submitted to the P/T.
- The proposed change form should be revised so as to be applicable for P/T code change proposals.

Revised procedures and guidelines reflecting discussions at the meeting will be prepared for the next meeting.

Technical Review

The Task Group discussed the matrices for the CCBFC standing committees. Memberships expire on October 31, 1999. There are vacancies, and it is expected that some members will retire or not be re-appointed.

These, together with membership lists will be distributed to the provinces and territories with a request that they assist in selecting candidates for vacancies and any other categories.

It was agreed to recommend that a representative of the P/T Advisory Committee should be a member of the CCBFC Chair's selection Committee.

Circulation Of Changes To The P/T

It was reported that CCBFC Standing Committees have completed or are completing the intent analysis and are beginning work on technical updating for the next edition of the codes. There is a backlog of technical issues that could not be handled until now, together with new change proposals, as well as matters and inconsistencies that arose as a result of the intent analysis.

Each standing committee will be reviewing its list of issues and attempting to assign priorities. A protocol has been prepared that most standing committees will be using to analyze their priority list. Once done it is proposed to circulate these lists to the provinces and territories for comment.

The Task Group asked that proposed changes in support of efforts to harmonize P/T and National codes be added as a #2 priority.

National Research Council Role.

It was noted that the new system does not significantly modify the role of NRC in the system. It was reported that Canadian Codes Centre operating procedures will be reviewed and modified where necessary to account for the new system..

Urgent Issues.

It was reported that at its meeting on May 17 & 18, 1999, the PTCBS discussed the issue of how individual provinces and territories are able to react to requests for immediate changes to their codes to deal with urgent issues.

Most have a need for some stakeholder consultation, however the degree necessary is not consistent. As well, there have been cases in some jurisdictions where, because of urgency, stakeholder consultation may have been greatly reduced.

Individual provinces and territories agreed to report on how their jurisdiction is able to respond to such requests and how quickly, so as to see if a national approach is possible.

The Task Group agreed that, if possible, it would be preferable if provinces and territories could, in most cases, rely on the new system to deal with urgent issues instead of individual P/T having to take unilateral action. Staff was asked to prepare a flow chart describing how the new system might incorporate such a fast tracking procedure.

Equitable Cost Sharing

This Item was not discussed.

Participation Of French Speaking Code Users

Although no progress was reported on this item, the Task Group asked to be kept informed of developments.

Open Tracking System.

It was reported that at its meeting on May 17 & 18, 1999, the PTCBS recommended that this item be given some urgency since transparency is a key selling feature of the new system.

IRC was asked to proceed with a feasibility study as soon as possible. Some provinces indicated they would be willing to consider participating in realizing the study.

Initial discussions have taken place with information technology (IT) people at IRC.

Standards Updating.

It was agreed that this matter be combined with discussions on the recommendations regarding “Urgent Issues” since the issues are basically the same. Both relate to provinces and territories issuing periodic revisions to the codes with diminished stakeholder consultation.

Core Code Cycle

Discussions on this item will occur once the issue of updating objective-based codes becomes clearer.

National Model Code For Renovation Of Existing Buildings.

It was agreed that since the matter had been referred to the CCBFC, the involvement of the Task Group has ended and this issue would be removed from future agendas.

Communications.

Latest versions of the CCBFC communication pieces on Objective-based codes and the new system were distributed. It was agreed that individual members would forward any further suggestions to Mr. Saint-Martin.

Implementation timeline and coordination with objective-based codes project

An updated timeline will be prepared for the next meeting.

Next Meetings

The next meetings are scheduled for:

August 19 and 20 in Edmonton

October 18 and 19 in St John’s NF (in conjunction with PTCBS)

January 24 & 25, 2000 in Toronto

Canadian Commission on Building and Fire Codes
Provincial/Territorial Committee on Building Standards
National Research Council of Canada

COMMITTEE PAPER ON

Core National Building Code

prepared for the

Joint CCBFC/PTCBS Task-Group on Implementation of a New Code Development
System

Richard Desserud
June 1, 1999

This document is a working paper prepared for consideration by committees dealing with the National Codes of Canada. The views expressed in this paper are those of the author and do not represent those of the Canadian Commission on Building and Fire Codes or of the Institute for Research in Construction or the Provincial/Territorial Committee on Building Standards. This paper is not a formal publication of the National Research Council of Canada.

Purpose of Paper

The purpose of this paper is to discuss the differences in the subject areas addressed by the national and provincial/territorial building codes with the view of arriving at consensus as to the subject areas of a core building code and the possible use of progeny documents where a full consensus does not exist. (see Appendix A)

Background

The Joint CCBFC/PTCBS Task Group on the Code Review and Development Process recommended that the CCBFC, NRC and the provinces and territories endorse the concept of “core building, fire and plumbing codes” which would contain all necessary requirements for widely agreed-upon issues and which the provinces and territories ideally should not have to amend..

Subject areas considered appropriate for a national approach but which are outside the scope of the core codes, could be published in separate stand-alone (progeny) documents, such as the model national energy codes.

Issues in subject areas outside the core codes, and not considered appropriate as CCBFC-produced documents, would remain the responsibility of the individual provinces and territories.

Naturally, adopting authorities always have the right to make changes and additions, however, it is hoped that, because of greater involvement of these authorities throughout the process, the need for change would be minimized.

This exercise will not attempt to resolve differences in technical requirements in subject areas. That will be the objective of a separate activity. Similarly the discussion on the scope of building codes will be part of the objective-based codes project.

Similar papers will be prepared for the fire and plumbing codes.

Examples of current NBC contents that are likely candidates for core building code contents

- Health and safety requirements for building occupants for construction of new “typical” buildings in the following areas:
 - Fire Safety
 - Structural design
 - Environmental Separation/Building envelope
 - HVAC
- Technical aspects of Barrier-Free Design
- Housing

Examples of current NBC contents that are questionable candidates for core building code contents

- Administrative requirements (Part 2)
- Policy issues regarding Barrier-Free Design (portions of Part 3.8)
- Administrative requirements (Part 4)
- Administrative requirements for plumbing systems (Part 7)
- Safety on construction sites (Part 8)

Examples of current CCBFC progeny documents

- National Farm Building Code
- National Plumbing Code
- Model National Energy Code for Buildings
- Model National Energy Code for Houses
- National Housing Code and Illustrated Guide
- Administrative Requirements

Examples of current P/T contents that are candidates for core building code contents or progeny documents

- Universally accepted administrative requirements (e.g. certification of safety equipment)
- Roles and responsibilities
- Barrier-free design requirements
 - parking stalls
 - sleeping units
 - Tactile signage
- Energy conservation
 - houses
 - other buildings
- Technical requirements for plumbing systems (Plumbing Code)
- Portable classrooms
- Self service storage
- Rapid transit stations
- Signs
- Standards for mobile/factory built homes
- Change of use
- Application to existing buildings/renovation projects
- Resource conservation
- Environmental protection
- Secondary suites
- Relocatable buildings
- Special requirements for heritage buildings
- Log construction
- Park model trailers
- Swimming pools
 - public
 - private
- Water Theme Parks
- Dairy Manufacturing Plants
- Coin operated dry cleaning establishments
- Abattoirs & meat processing plants
- Laboratories using biological agents
- Cemetery buildings
- Airport noise insulation

What Comes Next?

This paper will be converted by the Task Group into a set of recommendations to the CCBFC. A final CCBFC decision will require pre-consultation with provinces and territories and extensive public/stakeholder consultation.

Appendix B

Terms of Reference

Working Group to Resolve Technical Differences

of the Joint CCBFC/PTCBS

Task Group on Implementation of a New Code Development System

Background

The Joint CCBFC/PTCBS Task Group on the Code Review and Development Process recommended that a joint effort be initiated among code users to examine, and attempt to resolve, the present technical differences among the national and provincial/territorial codes. Some examples of technical differences are attached as Appendix A.

At the meeting for P/T Deputy Ministers responsible for the building codes, it was agreed in principle to work towards resolving differences among codes.

At its first meeting, the Joint CCBFC/PTCBS Task Group on Implementation of a New Code Development System decided that this topic would be appropriate for a small working group consisting of members from provinces with the most differences or those likely to initiate new ones.

At the PTCBS meeting on May 17 & 18, 1999, it was suggested that in addition to attempting to resolve technical differences among the national and provincial/territorial codes, that administrative differences be looked at.

Tasks

The Working-Group will recommend to the Task Group procedures and/or actions intended to resolve technical and administrative differences among provincial/territorial codes and the national codes. It is acknowledged that resource limitations and differences in approach will likely make it impossible to completely achieve this goal in time for the next codes.

In enacting these recommendations, the Working Group will involve stakeholders, CCBFC technical committees together with technical staff from the provinces and territories and IRC.

Additional provincial/territorial provisions not included in the national codes will be addressed in separate discussions on the contents of the core codes.

Timetable and Method of Operation

- The Working Group will target to complete its work in time for the last coordinated public consultation on technical changes to the core codes (timing uncertain but possibly in the 2nd quarter of 2002).
- It is expected that the working group will mostly operate by correspondence and conference call.
- It is anticipated that industry, and other national organizations, would see the value of this goal and may contribute towards its achievement.
- Differences among codes will need to be identified including the rationale. For example, PTCBS members will be asked to assist in identifying differences in building codes.
- It will be necessary to define which changes are truly technical in nature and which are scope/policy issues, and to set priorities. It is anticipated that “gray” areas will be encountered.

- Differences will be categorized to determine those that:
 1. are in critical need for resolution
 2. are considered essential by the P/T in question
 3. are too pervasive, complicated or controversial to resolve in the short term
 4. have a high potential for resolution
 5. could be considered for deletion
- The usual process will be for provinces and territories to submit differences as proposals for change to the core codes, including supporting rationale.
- Differences that will be recommended for inclusion / deletion to, core codes will be subject to the normal CCBFC change process and referred to Standing Committees, including economic implications.
- The timeline will probably be different for the 3 codes and work will proceed independently.

Members

Ontario Ministry of Municipal Affairs and Housing

Office of the Fire Marshal, Ontario

Ministry of Municipal Affairs, British Columbia

Alberta Municipal Affairs

Canadian Codes Centre staff as needed and appropriate.

Régie du bâtiment du Québec

Manitoba Labour

Sample Existing Technical Differences- B. C.

Convalescent, Children's Custodial and Residential Care Homes-3.1.2.5. (9.10.2.2.)

Ceilings over storage garages- 3.1.4.7

Combustible Insulation on ceilings of storage garages – 3.1.5.11.(7)

Heat detectors in Group C unsprinklered spaces, where fire alarms are required – 3.2.4.11 (2)

Technical specifications for visual alarm systems – 3.2.4.20.(3) to (10)

Resistance to Forced Entry in Part 3 Buildings – 3.3.4.8.

Demarcation of leading edges of exit stairs visible from both directions – 3.4.6.1.(1)(b)

Miscellaneous barrier free design requirements – 3.8

Reference to CSA S428, Guidelines for Durability in Buildings – 5.1.4.2.(2)

Winders on stairs need not converge to a point - 9.8.5.3.

Face orientation of treads doesn't apply to plywood – 9.8.9.4.(2)

Floor numbering maximum rise above the surface – (9.9.10.9.(1)(b)

Protection of storage garages re combustible insulation – (9.10.12.6.)

Granular material under slabs – 9.16.2.1.(1)

Certification of Cedar Shingles and Shakes – 9.26.2.1.(2)

Mechanical Ventilation for houses - 9.32

Appendix C

Possible revisions to Section 8 of the CCBFC Policies and Procedures

PROCEDURES FOR THE PRODUCTION AND REVISION OF CODE DOCUMENTS

8.1 Comments on and proposals for change of the Codes, their Users' Guides and progeny documents are always welcome and should be communicated in writing to the Canadian Codes Centre (CCC) or one of the participating provinces and territories (See attached Guidelines in Appendix XX for list of agencies and addresses):

8.2 Proposals for change should be submitted on the prescribed form and include information on:

- the problem with the existing code or document
- the proposed solution and how it addresses the problem
- cost implications
- enforcement implications.

(the proposed change form and guidelines for completion are shown in Appendix XX)

Proposals may be submitted using other formats as long as all the information indicated above is included.

8.3 All proposals for change to the core codes and progeny documents received by provinces and territories will be forwarded to the Canadian Codes Centre (CCC) at the Institute for Research in Construction, NRC. Provincial/territorial governments may add comments if so desired.

8.4 Proposals submitted directly to the Canadian Codes Centre regarding changes to requirements exclusive to an individual province or territory, or on administrative requirements under the purview of the adopting authority, will be forwarded to the appropriate P/T or municipality.

8.5 Proposals submitted to a province or territory regarding changes to requirements exclusive to an individual province or territory, or on administrative requirements under the purview of the adopting authority, will be handled by the P/T in question. Where the P/T believes the matter should be considered by the national process, the proposal will be submitted to the CCC with a request that it be considered to be a proposal to change the core codes.

8.6 Except as provided in 8.7, all proposals will be circulated by the CCC to all provincial/territorial agencies responsible for the particular document the proposed change addresses, giving the opportunity to comment. (Time limit?)

8.7 Proposals will be analyzed by the CCC and directed to the CCBFC for direction where the proposal:

- is deemed to fall outside the agreed objectives and subject matter of the core code
- is deemed to change the scope of the code by extending the application of a requirement
- is deemed to impose a significant cost increment (criteria?)
- has received significant objection from a province or territory (see 8.6)
- is judged likely to received substantial adverse reaction from industry, the regulatory community or the public.

8.8 In considering proposals described in 8.7, The CCBFC will seek, and take into account, the advice of the appropriate Provincial/Territorial Advisory Committee. The CCBFC may take one of the following actions in dealing with such proposals.

- reject the proposal
- return the proposal to the proponent with the request for amendment or more information together with the reasons for the request
- forward the proposal to the relevant standing committee, including any comment from a province or territory.

The proponent and the provinces and territories will be informed of the decision.

DRAFT

Appendix XX-Guidelines for Proposing Changes to the Building, Fire and Plumbing Codes

Suggestions for changes to the building, fire and plumbing codes are welcome from anyone at any time; the codes must change to keep up-to-date. Anyone who is thinking of submitting a change proposal should bear the following points in mind:

To Whom Do I Submit a Proposal?

Proposals for change to the building, fire and plumbing codes may be submitted to one of the provincial and territorial agencies listed at the end of this brochure, or directly to the Canadian Commission on Building and Fire Codes at NRC. Regardless of where the submission is made, it is given the same priority and is treated in the same manner.

In some cases a requirement is unique to a particular province or territory. Proposals to change these provisions should be sent to the province or territory in question. Where such proposals are sent to NRC, they will be redirected to the appropriate jurisdiction.

What Happens to My Submission?

If the proposal is to change one of the national codes, it is then sent to NRC 's Canadian Codes Centre (CCC) where it receives an initial evaluation. All submissions are circulated by the CCC to the responsible governments agencies of all the provinces and territories so that everyone is aware of what is happening and is given an opportunity to comment. Normally, the proposals are then sent on to a technical standing committee for review.

Proposals that would change the scope of the codes and those considered to have significant cost implications, as well as those over which provinces and territories have raised a concern, will be further considered the CCBFC. The Commission will decide on whether these proposals will proceed through the normal technical review process in consultation with provincial/territorial advisory committees.

Who Must Be Convinced?

Proposed changes are reviewed technically by one of the supporting committees of the CCBFC, called standing committees. These standing committees are made up of volunteers from all regions of Canada and all facets of the construction industry.

To bring about a change in one of the national code documents, you must convince the appropriate standing committee that a change is needed in the subject code and that the change you propose is technically correct.

Even if a standing committee agrees with the proposal, all technical changes to the codes must be circulated for public review and comment. Reaction from code users may cause the standing committee to reconsider the proposed change or to drop it.

Supporting Documentation

Proposals to change one of the Code Documents should be accompanied by enough documentation to make a convincing technical case that a change is needed, and that the proposed change is the right one. This documentation can include research and testing results, statistics, case studies and so forth.

Cost Implications

One important aspect of documentation supporting a proposed change to a code is information on the costs of implementing it and the likely benefits to be achieved. This is not to suggest that every code change proposal must be accompanied by a detailed cost/benefit analysis; however, the standing committees are expected to give due consideration to these questions and reasonably expect proponents of changes to contribute information that will assist them in this task. Where the proposed change has major cost implications, a detailed cost/benefit analysis may be necessary.

Enforceability

Proponents of changes to the codes should also bear in mind that there is little use in introducing requirements for which there are no practical means of enforcement. Therefore, a proposal for a change to a code should include information on enforcement implications.

Clarity

Proposals should identify the shortcomings of the existing requirements and new wording should be suggested to address these shortcomings. Codes Centre staff will be able to suggest improvements in proposed wording, if necessary. Proposals for changes that are not clear run the risk of being returned to the proponents for clarification, prolonging the time required for the standing committees to deal with the proposals.

Stick to Technical Issues

With a few exceptions, the national codes are strictly technical in nature and do not deal with administrative issues, such as what professional qualifications are required to perform certain functions, or the need for inspections or permits. The provincial and territorial agencies which adopt the National Code Documents have instructed the Canadian Commission on Building and Fire Codes (CCBFC) to avoid addressing these issues in the Codes because to do so would create potential conflicts with related provincial/territorial legislation and regulations. Therefore, proposals to change the Codes to address these issues will be directed to the appropriate province or territory, unless there is some doubt that they are strictly administrative in nature.

Stick to Generic/Widespread Issues

It is impractical for the codes to deal with specific products or with situations that arise only rarely. Proposals for change should therefore be limited to generic or widespread issues. Innovative products not yet covered by standards are not necessarily excluded from use by not being mentioned in the codes; they can be accepted by local authorities based on the equivalence provisions in the codes. Services, such as NRC's Canadian Construction Materials Centre, are available to assist authorities in evaluating such equivalence. Similarly, unique situations are best dealt with by local authorities rather than swelling the codes with requirements that are seldom used.

Decisions

In all cases, the CCBFC decides on what goes in the national codes, and individual provinces and territories have the final say on what is adopted into law.

Summary

Proposals to change one of the codes should be framed in such a manner as to convince a committee of volunteer experts that there is a problem with certain existing requirements of the Code or an omission in those requirements. The proposals should also be accompanied by documentation to support the case being made, including information on the likely costs of implementing the proposed change.

Each proposal should answer the following questions:

- What is the problem?
- What is the proposed solution and how does it address the problem?
- What are the cost implications?
- What are the enforcement implications?

Proposals should be as clear as possible. They should address only generic or widespread technical issues and avoid administrative issues.

Proposed Change Form

The attached form can be used for submission of proposed changes, although its use is not mandatory provided these guidelines are satisfied. Where the form does not provide sufficient space for the information you wish to include, please attach additional sheets as necessary.

Send form to: **(provisional list. P/T's can opt out of acting as a point of entry)**

Secretary, Canadian Commission on Building and Fire Codes, National Research Council of Canada (Building, Fire and Plumbing Code)

B. C. Ministry of Municipal Affairs (Building, Fire and Plumbing Code)

Technical & Safety Services Division, Alberta Municipal Affairs (Building, Fire and Plumbing Code)

Alberta Safety Codes Council

Saskatchewan Municipal Affairs, Culture and Housing (Building and Fire Code)

Saskatchewan Health (Plumbing Code)

Office of the Fire Commissioner, Manitoba Labour (Building, Fire and Plumbing Code)

Housing Development and Buildings Branch, Ontario Ministry of Municipal Affairs and Housing. (Building and Plumbing Code)

Office of the Fire Marshall (Ontario) (Fire Code)

Régie du bâtiment du Québec (Building and Plumbing code)

Department of Municipalities, Culture and Housing (N.B.) (Building and Fire Code)

Department of Labour (N.B.) (Plumbing Code)

Municipal Services Division, Department of Housing and Municipal Affairs (N.S.) (Building and Plumbing Code)

Office of the Fire Marshall, Nova Scotia Department of Labour (Fire Code)

Community Services and Attorney General (PEI) (Building, Fire and Plumbing Code)

Government Services Branch, Department of Government Services and Lands (Nfld.)

Office of the Fire Commissioner, Dept of Municipal and Provincial Affairs (Nfld.) (Fire Code)

Public Safety Branch, Yukon Community and Transportation Services. (Building, Fire and Plumbing Code)

Office of the Fire Marshal, Government of the Northwest Territories (Building, Fire and Plumbing Code)

Office of the Fire Marshal, Nunavut Government (Building, Fire and Plumbing Code)

National Research Council Conseil national de recherches
 Canada Canada
 Institute for Institut de
 Research in Construction recherche en construction

For staff use only: Date Received _____ _____ Standing Committee on _____ _____ PCF# _____ _____
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Proposed Change to a National or Provincial/Territorial Code Document

(only one proposed change on any one submission - duplicate as necessary - print single sided)

(Attach additional pages as necessary or use any other format as long as all the information indicated below is included.)

Mail to:

See list on attached guidelines

Name _____ Phone # () _____ Fax # _____

Address _____ e-mail _____

Document	<input type="checkbox"/> Building Code	<input type="checkbox"/> Fire Code	Edition _____		
	<input type="checkbox"/> Plumbing Code	<input type="checkbox"/> Farm Building Code			
	<input type="checkbox"/> Energy Code for Buildings	<input type="checkbox"/> Energy Code for Houses			
Code	<input type="checkbox"/> National	<input type="checkbox"/> B.C.	<input type="checkbox"/> Alberta	<input type="checkbox"/> Saskatchewan	<input type="checkbox"/> Manitoba
	<input type="checkbox"/> Ontario	<input type="checkbox"/> Quebec	<input type="checkbox"/> New Brunswick	<input type="checkbox"/> Nova Scotia	<input type="checkbox"/> PEI
	<input type="checkbox"/> Newfoundland	<input type="checkbox"/> NWT	<input type="checkbox"/> Yukon	<input type="checkbox"/> Nunavut	

Code Reference it is proposed to change _____

(Article, Sentence, etc.)

Problem - Why should the existing provision be changed or, if proposing an addition to the Code, what is missing?:

Proposed Change/Addition - What wording for the change/addition do you think should be used in the Code?:

complete next page as well

Justification/Explanation - How does proposed change/addition address the problem?:

Cost Implications - Will the change/addition entail any added costs? Will it provide benefits measurable in monetary terms?:

Enforcement Implications - Can the proposed change/addition be enforced by the infrastructure available to enforce this Code? Will its enforcement require an increase in resources?:

Other Comments:

Attached Supporting Material:

Please leave this space blank

