

DRAFT 9 July, 1998

**CCBFC/PTCBS Joint Task Group on the Model Codes
Review and Development Process**

Report of the Sixth Meeting
24, 25 May 1998
Halifax, N.S.

Members present:

Chair: Bruce Clemmensen
Ann Borooh
Mike Dwyer
Chris Fillingham
Serge Goulet
Rick McCullough
Dick Miller
Fred Nicholson
Krystyna Paterson
Ross Rettie
Ted Ross
Chris Tye (May 25 only)

Members absent:

Tom Makey
Jack Robertson

IRC Staff:

John Berndt
Richard Desserud

Visitors:

Harry Wiebe- PTCBS Manitoba
Margaret Miller- PTCBS Saskatchewan
Bruce Stebbing – PTCBS NWT
Gerry MacDonald – PTCBS PEI
Chuck Sanderson – Manitoba Fire
Commissioner's Office
Don Johnston - CHBA
Rod McPhee- CWC
John Healey – Atlantic New Home
Warranty Program
David Garrett – Architect, Halifax, N.S.
Ann E. Janega - NSHBA
Luc Saint-Martin- NRC

REPORT OF THE 5TH MEETING

The report of the Fifth meeting was approved with some minor changes. (The final version is now posted on the Task Group Web Site)

PRESENTATIONS BY VISITORS

Three presentations were made to the Task Group

Mr. Don Johnston representing the Canadian Home Builders Association. (The full text of the presentation is attached as Appendix A). Mr. Johnston reported that this was an interim position from CHBA and a final position paper would be forthcoming.

Ann E. Janega, representing the nova Scotia Home Builders' Association. (The full text of the presentation is attached as Appendix B)

Dave Garret, Architect, Halifax addressed the Task Group explaining difficulties he has encountered in applying the NBC to existing buildings and infill housing. The Task Group noted that such issues were not really within its mandate, however, others had also made similar points in making presentations. The matter will have to be addressed somehow in the Task Group final report. In the interim, Mr. Garret was referred to other documents and jurisdictions for possible guidance on this issue.

Mr. John Healey, representing the Atlantic Home Warranty Program, suggested that the code development process should possess the following characteristics:

- While the goal is uniformity, the process should allow for technically justifiable differences.
- The process needs to be conscious of adding costs, but at the same time must be conscious of affecting quality in a negative way
- There is a need to keep up with advances in technology
- Smaller players/market must be able to participate, all should be equal at the table
- The system must be transparent, cost effective, not under the influence of lobby groups
- No hidden agendas
- Codes need to be readable and enforceable
- The decision making body for the core codes should be independent of government.

Comments and recommendations made in these presentations will be discussed fully at the next meeting of the Task Group.

DISCUSSION OF RECOMMENDATIONS AND COMMENTS MADE AT THE 5TH MEETING

The Task Group reviewed the presentations made at the 5^h meeting with the view to identifying recurring themes, new viewpoints and reinforcing ideas.

Conclusions and Recommendations from the Professional Engineers of Ontario (PEO)

“... the National Building, Fire and Plumbing Code should be adopted by all Canadian jurisdictions as the *core code* for each province and territory. The *core code's* content should be restricted to fire and life safety, public health, and structural sufficiency issues.”

Task Group Comments. The concept of a nationally adopted core code, with ancillary parts and prodigy documents, has the support of the Task Group. The scope of such a core code will be determined by the Objective-based code discussions, however it seems likely that it would go beyond health, safety and structural sufficiency and include items such as barrier-free access.

“...the point of entry for proposed changes to the *core code* should be through the CCBFC.”

Task Group Comments. An emerging principle for code development is that the adopting authorities require involvement at all stages of the process. Having the provinces and territories act as the entry point reinforces local ownership of the system, and increases the likelihood of buy-in to the final results. Direct submission to the code secretariat by national groups would be appropriate, since such groups are not affected by this concept.

“... All proposals for *core code* changes should ... provide an economic assessment of the proposed change.”

Task Group Comments. While not always easy to achieve, analysis of economic impact is now an accepted criteria for code changes.

“... Resources used in the past to develop unique codes for individual jurisdictions should be rerouted to the *core code* development process.

Task Group Comments. The issue of resources will require discussion at a future meeting.

“... *Core code* change proposals should be delegated through CCBFC to its technical committees for assessment.”

Task Group Comments. Without precluding the right to develop technical solutions at the local level, there appears to be strong support for a technical review process that would not be drastically different from the existing CCBFC Committee process.

“The involvement of the PTCBS should come at two distinct points in the *core code* development process.

- ... proposal for a *core code* change ...should be provided to the PTCBS for ... possible comment prior to the *national public review*.
- Any PTCBS comments received should be included in the *national public review* package.
- ... any *core code* change ... must be ratified by the PTCBS.

Task Group Comments. These concepts are not inconsistent with discussions so far and will be explored further.

- “Improved communications between CCBFC and provincial and territorial authorities will be required ...”

Task Group Comments. Communication will be a key to the success of the new system.

“The Canadian Codes Centre should be designated as the official body responsible for interpretation of the core code.”

Task Group Comments. This is seen as problematic due to P/T legal responsibilities to officially interpret legislation. The CCBFC process presently limits its role to explaining the model codes, and this is seen as a valuable service.

“There should be only one *national public review* of core code change proposals with the same deadline for all jurisdictions.”

Task Group Comments. This concept has wide support.

- Initially, a formal partnership agreement between the provincial/territorial and federal authorities (CCBFC) will likely be required to implement a single, national *core code* development process.

Task Group Comments. The existing Memorandum of understanding will need to be revisited.

PEO Recommendations. PEO makes the following recommendations for the consideration of the joint CCBFC and PTCBS Task Group.

Recommendation #1. PEO recommends that one national building, fire and plumbing code for all provinces and territories be adopted.

Task Group Comments. No disagreement in principle.

Recommendation #2. PEO recommends that the PEO model for a national core code development process ... be adopted.

Task Group Comments. The PEO model will be considered along with others.

Recommendation #3. PEO recommends that all necessary steps be taken to ensure that implementation of any new core code development process coincides with the completion of the objective-based building code which is currently targeted for 2001.

Task Group Comments. No disagreement in principle.

Recommendations from Robert W. Rush, P.Eng.

Task Group Comments. The Task Group believes that the principles in virtually all of Mr. Rush's comments and recommendations had been discussed or were under active consideration.

DISCUSSION OF CCBFC EXECUTIVE COMMITTEE MEETING HELD MAY 7 & 8

- Numerous points arose at the CCBFC Executive Committee meeting that would have impact on the work of this Task Group.
- The Objective-Based Codes development work may cause the 2001 completion date for the next code to be delayed.
- The hope is for elements of the new system being developed by this Task Group to be used in some of the Objective-Based Codes review and development, namely public consultation on Root Objectives/scope of the core codes; public consultation on technical updating; public consultation on the new code format; and final approval of the next codes.

“STRAW” CODE REVIEW AND DEVELOPMENT MODELS

Four additional Straw models for a new code development system were discussed, Mark 9, 10, 11 and 12. (These are attached as Appendix C).

Points raised included:

Point of Entry

- The Task Group reaffirmed its view that Provinces and Territories should be the normal entry point for all code changes. This ensures a critical understanding among P/T stakeholders that the building, fire and plumbing regulations are the responsibility of the P/T's and that the processes is driven at the P/T level.
- Proposals inadvertently submitted to the Secretariat would not be refused, but the acknowledgement would advise the proponent to submit them next time through the appropriate P/T agency.
- Proposals would then be forwarded to a Secretariat (possibly the Canadian Codes Centre) supporting a "Decision-Making Body" (name and composition to be determined). Whether a P/T performs an initial technical assessment and submits the proposals with comments or merely acts as a "mailbox," is at the discretion of the individual P/T.
- All core-code related proposals, would be forwarded and could not be unilaterally cut off at the entry point.
- Non-core code issues (such as Septic Tank requirements in Ontario, relocateable buildings in Alberta, etc) would be handled at the local level.
- The Secretariat would circulate all proposals to every P/T. Where there is "sufficient" P/T objection to the proposal, it shall be referred to the "Decision Making Body" for resolution.
- Proposals from national and industry groups and associations could be directly submitted to the Secretariat.
- The Secretariat would evaluate proposals based on guidelines prepared by the "Decision-Making Body" and refer all significant, controversial, "policy" (e.g. scope) and issues with major economic impact to the "Decision-Making Body" for resolution.
- An open tracking system should be created to allow proponents to track the progress of the proposal throughout the process, possibly via the Internet. Acknowledgement and responses to actions on a proposal will rest with the Secretariat.
- The Secretariat can explain the intent of the contents of core codes, but not officially interpret them. Official interpretation remains the purview of the adopting authority.

Technical Review

- The description of the Technical Review Process in the Straw Models was generally considered appropriate, except that Technical Committees should be able to revisit the triage applied by the Secretariat, and refer matters directly to the "Decision-Making Body" if there is disagreement.
- Also there should be a statement that issues with major economic impacts should be referred to the "Decision-Making Body" for consideration prior to expending resources on their further development.

Pre- Consultation Decision

- Some provinces have a need to obtain “permission to consult” from government before releasing proposed changes for public consultation, therefore, all proposed changes need to be circulated to P/T prior to wide release.
- Wide release would not occur until all provinces have given the go-ahead.
- Although there would be no veto by individual P/T, if there is concern expressed by a P/T, the matter would be referred to the Decision-Making Body for resolution. Guidelines would be needed as to how the “Decision-Making Body” should deal with such concerns.
- There is a possibility that a proposal could be released with a statement that one or more provinces do not support the proposal.
- It is acknowledged that this step could introduce delays into production of the core codes, however, this would have to occur during the present adoption process anyway.

Public/Stakeholder Consultation

- Some individual Provinces and Territories will probably choose to manage the process and request and receive public comments in their jurisdictions. Comments could be reviewed and forwarded to the Secretariat with P/T comment and/or recommendations for resolution.
- In order for this to be a coordinated process, provincial/territorial core and non-core changes would be included in public review packages. Those requesting change packages would receive only such changes for their individual P/T unless all are specified.

Technical Content Advice

- The concept of a “Technical Advisory Committee” presented in Straw Model #12 received some support. It would be made up of Technical Committee Chairs and Provincial/Territorial “Technical” Officials
- It would review actions of Technical Committees in dealing with stakeholder comments and advise the “Decision-Making Body on adherence to “due process.”
- It would advise the “Decision-Making Body regarding the acceptability to P/T’s of recommended technical changes to the core codes. Participation on this committee would not commit P/T governments to accept any proposed change.
- This group could also play an important coordinating role between technical committees
- P/T participants may differ for each code because of jurisdictional differences.
- All recommended changes together with comments by the Advisory Committee, would be circulated to the P/T for information

Approval of Code Changes

- The “Decision Making Body” would be responsible for scope, format, content, process of the core codes. It would decide upon all changes to the core codes as recommended by the technical committees and establish priorities. It would be responsible for the Matrix/Membership of

Technical committees. It is expected that one body would be enough to deal with all the core codes.

- The “Decision-Making Body” would seek advice from a P/T “Board” that would advise the “Decision-Making Body” on policy matters (scope, format, content, process) as well as major changes, or those with considerable economic or political impact. A dispute-resolution mechanism such as described in the MOU may be desirable.
- The Task Group does not favour the scenario where the “Decision-Making Body” would be made up of members from P/T Regulatory Bodies only. A preferred scenario would have the “Decision Making Body” made up of members from Regulatory Bodies, Industry and General interest according to a balanced matrix similar to the CCBFC.
- The Task Group was of the opinion that it would be impractical to expect the “P/T Board” to ratify the changes approved by the Decision-Making Body because it was unlikely that anything other than individual P/T positions would be possible. Participation by the P/T’s throughout the process also makes such ratification unnecessary.
- The “Board” would provide comments on the acceptability of proposals on an individual P/T basis, and the “Decision-Making Body” would be expected to make final decisions on the core codes, taking such comments into account.

It was agreed that an additional “straw” model encompassing these features/principles as possible be prepared, including flow charts, and circulated widely prior to the next meeting.

COMMUNICATIONS

The communications package and final report format was discussed briefly. It was decided to include information on the relationship/impact of Objective-Based Codes on the new process, discussion of resource impact, practical impact on document production, flow charts, and the relationship with the Objective-based codes project schedule.

A draft of the final report in outline form is to be prepared for the next meeting.

FUNDING AND RESOURCES

This issue will be discussed more completely at the next meeting.

Points that will have to be covered include;

- Incremental costs due to the new process (more committees?, more meetings?)
- Balance between NRC and P/T costs (presently some P/T have virtually no costs for code development)?
- Cost to analyze new acceptable solutions?
- Shared cost for shared committees?
- Will there be additional revenues generated?

TIMING AND SCHEDULE

A meeting of the Deputy Ministers responsible for building regulations is proposed for November 18 1998. The recommendations of this Task Group will be one of two main agenda topics (the other is Objective-Based Codes). Since this Task Group has scheduled its last meeting for September, getting CCBFC and PTCBS buy-in for the recommendations prior to the DM meeting is problematic.

Key meetings to work around are;

1. CCBFC Executive Committee – September 16 1998
2. CCBFC Meeting - October 4 & 5, 1998
3. PTCBS Meeting - Nov 16 & 17, 1998

FUTURE MEETINGS

The next meeting is re scheduled for July 27 and 28 in Edmonton. An additional meeting has been scheduled for September 14 and 15 in Regina.

Appendix A

CANADIAN HOME BUILDERS' ASSOCIATION Position Paper on the Building Code Development and Review Process

1.0 Introduction

The Canadian Home Builders' Association (CHBA) represents the Canadian residential construction industry. It is one association organized at the local, provincial and national levels. It is governed by a board comprised of a national executive elected by the membership and the elected presidents of its ten provincial associations, as well as the chairs of national standing committees.

The CHBA is a long time supporter of Canada's Code System and its members play an active role in its many committees and councils, both at the national and provincial levels. CHBA supports the goals of the CCBFC Strategic Plan to have a responsive, objective, efficient and effective code development system, and to have future national model codes adopted uniformly by all authorities having jurisdiction in Canada. This can be furthered through the work of the Task Group in recommending an appropriate level of national, provincial and territorial participation in the code development and review process, including strategies to establish a coordinated code public review process.

The recommendations contained in this report pertain primarily to the Building Code, although the principles similarly apply to the other model codes. Appendix A provides the background on the code development process.

2.0 Principles

2.1. Uniformity and Flexibility

The CHBA supports the concept of a "core code" which would apply in all jurisdictions and would address health, safety and structural sufficiency matters. As is currently the case, it would be flexible enough to respond to Canada's various geographical and climatic conditions. Should the government of one or more provinces wish to address other objectives through the code system, progeny documents should be developed under the auspices of the CCBFC. Additional, ad hoc amendments should be discouraged.

2.2. Consensus by Users The CHBA believes that the consensus of volunteers, representing all interests in building construction, is the cornerstone of the National Code System. Individuals, selected for their knowledge, experience and expertise should be responsible for the development of national model codes. The CCBFC, which embodies this principle, should remain responsible for the National Model Codes.

2.3. Provincial Accountability Provinces have the constitutional jurisdiction for building regulation. Provincial code adoption should remain distinct from the National Code Development Process. Provincial stakeholders should be able to make direct representation to their provincial governments with regard to regulatory concerns. Responsibility for interpretation and enforcement of uniform standards should remain in place at the provincial level.

2.4. Timeliness

Provincial governments should revise their codes in response to changes to the National Model Code, promptly and within an agreed time frame. There should be an official statement of intent by the Provinces to do so.

2.5. Public Consultation There should be one public consultation on building code changes rather than separate national and provincial consultation processes. The opportunity for stakeholders to make their views known to their provincial governments on matters of health, safety and structural sufficiency should occur through the same process used by the CCBFC and its committees. Separate provincial consultation processes on these matters does not achieve the cost effectiveness and efficiencies that all participants would like to achieve.

2.6. Transparency

The National Model Code Development Process must be open and transparent to assure provincial governments that due process has been followed.

2.7. Cost Effectiveness The CHBA supports the CCBFC Strategic Plan objective of taking cost implications into account for all new or revised model code requirements. It should fall to the proponent to provide the necessary documentation to the Commission as to why a change should be considered rather than on the Commission to say why not. This objective has already been addressed under the current arrangements.

3.0 Process

3.1 Entry

Stakeholders should have the opportunity to submit proposals for changes to the Code to the CCBFC or to their respective provincial governments at any time and should be able to expect prompt attention should it be warranted.

Assuming the continuation of a five year reassessment regime, a cut-off date for proposed changes to the National Model Code should be widely announced. Provincial governments, particularly those which have conducted separate public consultations in the past, should advise stakeholders that they are accepting proposals for change until the same date. Proponents should have the option of entering the process through either or both routes.

3.2 Technical Review Provinces should have the option of reviewing proposals before forwarding them to the CCBFC which in turn would provide them to the appropriate Standing Committee for review after dealing with matters of policy with provincial representatives. The consultation document resulting from the work of the Standing Committees should separate "core" and "non-core" matters. Provinces should review and comment on the consultation document prior to its issuance. Separate provincial sections may be required.

3.3 Consultation

Respondents should have the choice of submitting written briefs to either the CCBFC or provincial departments or both.

3.4 Decision

The process of working through the submissions, and assembling the revision package should remain with the Standing Committees. Provinces should have the opportunity to comment on the changes recommended by the Standing Committees prior to their consideration by the CCBFC. No additional level of decision making should be required.

CHBA

May 20, 1999

(Appendix to the CHBA Position Paper)

CANADIAN HOME BUILDERS' ASSOCIATION Position Paper on the Building Code Development and Review Process

Background

Legislative authority for the regulation of building design and construction falls mainly within the purview of the provincial level of government. The provincial building codes are based on the National Building Code which is developed by the Canadian Commission on Building and Fire Codes as a model for provincial adoption. This arrangement, which has resulted in a high degree of uniformity between provincial codes, has been of considerable benefit to Canadians; facilitating the flow of goods and services and helping to create an efficient industry.

The Model National Building Code represents the collective knowledge and insight of Canada's designers, manufacturers', builders, regulators, and consumers; provided on a volunteer basis, using a consensus approach and supported by the resources of the NRC. Every five years, through a process of broad public

consultation, a new edition of the Model National Building Code is produced, triggering a review and adoption process by the provincial agencies responsible for building regulation in their respective jurisdictions

As part of the provincial code amendment and adoption process, some provinces have introduced a public consultation process which is seen by stakeholders in those provinces as important in ensuring that provincial codes are properly tailored to local needs. The enormous number of changes made to the 1995 National Building Code, and the fact that important changes were made without cost/benefit analysis and on a majority vote, rather than a consensus basis, may have undermined confidence in the national process, further increasing divergence between codes. At present, not only are some provinces considering major amendments to the 1995 model code before adoption, but the time frame for adoption appears indefinite.

In addition to the inherent overlap and duplication, the second provincial level review has tended to undermine the rigour of the national review. At the same time, submissions made to the provincial processes may have less impact than would have been the case earlier in the process during the national consultation. What modifications which are made as a result of the second provincial consultation, contribute to increased variation in code requirements, to the detriment of the system as a whole.

The challenge then is to strengthen national uniformity, while providing provincial governments with the opportunity they feel is needed to properly serve their constituents and be assured about the quality of their code, without making the process more cumbersome.

Appendix B

Nova Scotia Home Builders' Association Brief to the CCBFC-PTCBS Joint Task Group on the Code Review and Development Process Delta Barrington Hotel, Halifax, Nova Scotia May 25,1998

INTRODUCTION

The Nova Scotia Home Builders' Association is recognized as the voice of the residential construction industry in Nova Scotia. Through their membership in five local associations, our members reflect all aspects of the residential construction industry: builders, renovators, developers, designers, managers, realtors, sub-trades, suppliers, manufacturers, regulators, inspectors, bankers, lenders and lawyers.

Our local and provincial groups maintain standing committees on technical research, including codes and standards. We sponsor on-going training and education on codes and regulations. We organize annual seminars for the professional development of our members and their further understanding of industry issues. Our volunteers participate nationally and provincially in numerous associations, committees and task groups as representing the builder perspective on issues of concern to the residential construction industry.

We are pleased to have this opportunity to present our thoughts on the code review and development process. We first outline here what we see as the three most important principles in the building code development process. We then include proposals on how the process might encompass those principles in the context of the forthcoming objective based code format.

PRINCIPLES AND CONCERNS

The Nova Scotia Home Builders' Association addresses three principles and presents our concern for their importance: **UNIFORMITY, TRANSPARENCY AND ACCOUNTABILITY.**

We strongly support the principle of **UNIFORMITY**: a national model code uniformly adopted by the provincial authorities, which defines minimum requirements for the health and safety of the occupants and users of the buildings we construct. Uniformity needs to exist on three levels: 1) Nova Scotia – Canada, 2) Nova Scotia – other Atlantic provinces, and 3) within Nova Scotia.

Current provincial-national agreements and the current process of review and approval reasonably support the adoption of the national model by the provincial authority. Future agreements and processes, however, should also vigorously encourage each provincial authority to adopt the same model code. Especially among the Atlantic provinces, we have unequal legal status of the code and we see adoption of dissimilar codes. This condition is too easily condoned by the current process. It presents the industry with administrative burdens and financial hardship as we try to conduct our business as builders, suppliers, manufacturers, etc., across provincial boundaries.

The review and development process should also facilitate uniformity within the province. In the guise of interpretation and enforcement, the local authorities having jurisdiction are in effect creating their own disparate codes. Authorities should be obliged to base their interpretation on nationally recognized code commentaries and to consider the rigorous technical analysis that has been part of the national model code development process.

National and provincial authorities and processes accept the principle of uniformity. Their actions in the future should more actively support, encourage and advance the principle of uniformity.

The Nova Scotia Home Builders' Association strongly supports the principle of **TRANSPARENCY**: clearly defined procedures for code development and adoption, which are based on objective building science, conducted in a consensual democratic fashion and continuously open to public observation.

This principle applies throughout the code development process: entry, argument, review, recommendation and adoption. Proponents of a code change should be able to enter their proposal at specific stages in the process on either the provincial or national levels. They should be obliged to support their proposal with evidence that a problem exists and must be addressed, and that their proposal is a cost-effective solution to the problem. The proposed code change should be subject to review for technical merit and from industry peers. The review should culminate in a recommendation of an appropriate action to be undertaken by the body formulating the model code.

The principle of transparency provides assurance that all sectors of the industry can observe and participate in the code process. By having a role in the process, each group accepts its share of responsibility for the process. Short-cuts, end-runs, back-doors, imperial-decrees and black-balls are prevented by the constant scrutiny and openness of the process. Transparency promotes integrity.

The Nova Scotia Home Builders' Association supports ACCOUNTABILITY as the logical and necessary consequence to transparency. Accountability is the obligation of the parties to the process to accept responsibility for their actions, and it is the obligation for those parties having authorities and duties in the process to be responsive to their constituents.

We see the federal government giving leadership and support in the development of model national codes. We see the provincial governments giving their cooperation and participation in the coordinated development and review process. We also see the provincial governments using the process in the context of their constitutional jurisdiction for building codes and regulations. Adoption, interpretation and enforcement are provincial responsibilities. These responsibilities have to be carried out with a careful balance between national cooperation and provincial obligations. The final authority rests with the provincial governments, the final accountability lies within the provincial system.

OBJECTIVE BASED CODE

The Nova Scotia Home Builders' Association supports the traditional scope and objectives of the national model building code developed through the process described above. Those objectives are fundamental in importance and national in scope and are therefore not likely to change. Any amendment proposed for them must be subject to rigorous national review.

The objective based code contains a second half which delineates the prescriptive requirements by which the objectives can be met. Proposed amendments can be divided into three classes: additions, deletions and alterations.

Most changes to this portion of the code will likely be additions to the code, granting permission or enabling the use of new designs, systems or materials. Those additions may be numerous and their adoption ought to be swift, with regard to technical review and due process. The proponent of an addition should be obliged to demonstrate how the new element meets the established objectives, and the jurisdiction accepting the addition should be obliged to accept the customary liability that is part of their authority.

Where changes to the prescriptive portion of the code are substantive alterations or deletions, those changes should be subject to the national review process.

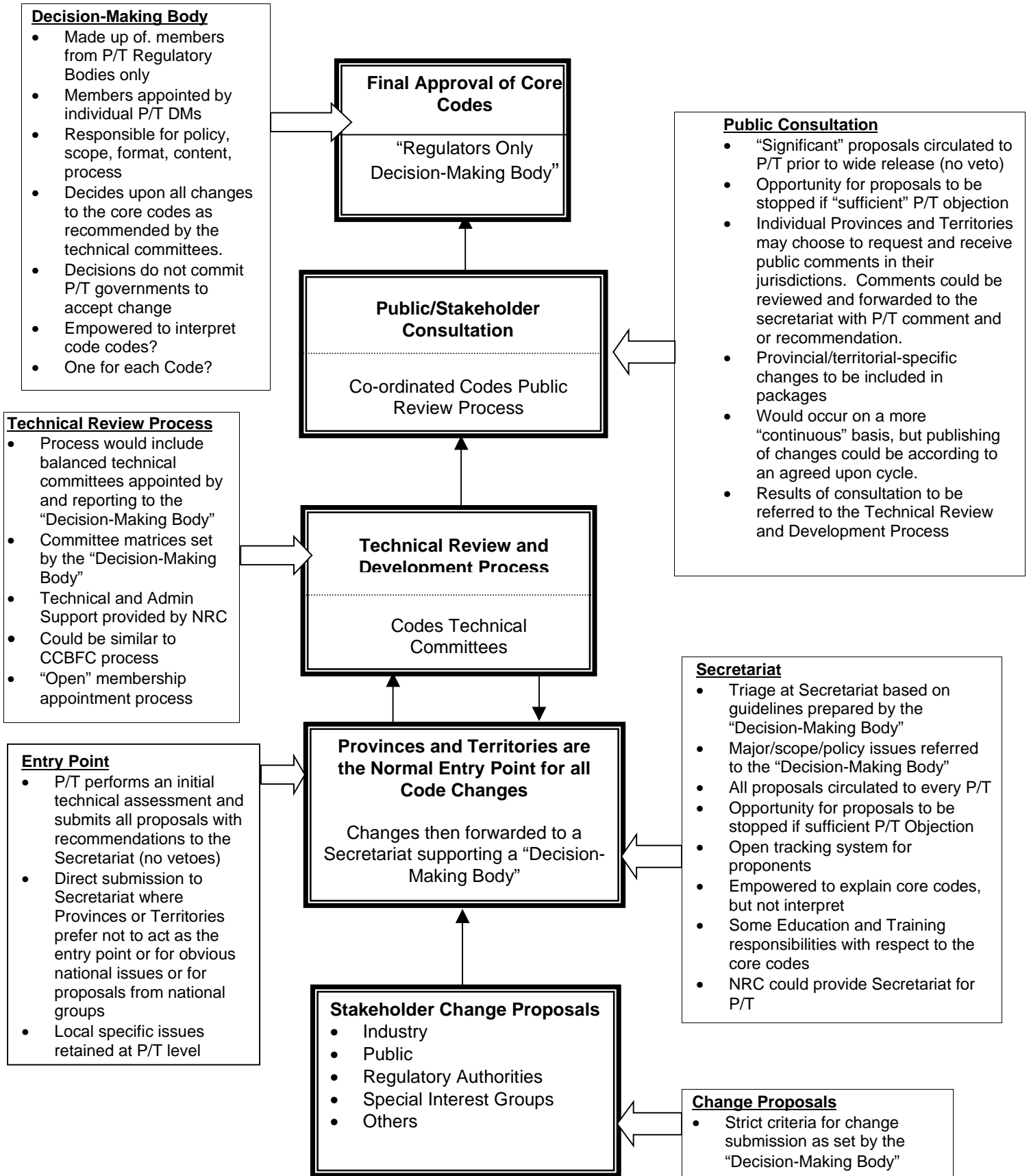
Where proposed changes affect the scope and objectives of the code, those changes too should be subject to the national review process. If there is sufficient interest for the change, that process may start with the development of an accessory document (or progeny model code) that can stand alone and, where approved, be added to the provincial edition of the national code.

In conclusion the Nova Scotia Home Builders' Association strongly supports the principle of a uniform national model code, developed through a transparent process, and adopted by authorities that are responsive and accountable. Our association is pleased to make this presentation and looks forward to further participation in this development and review process.

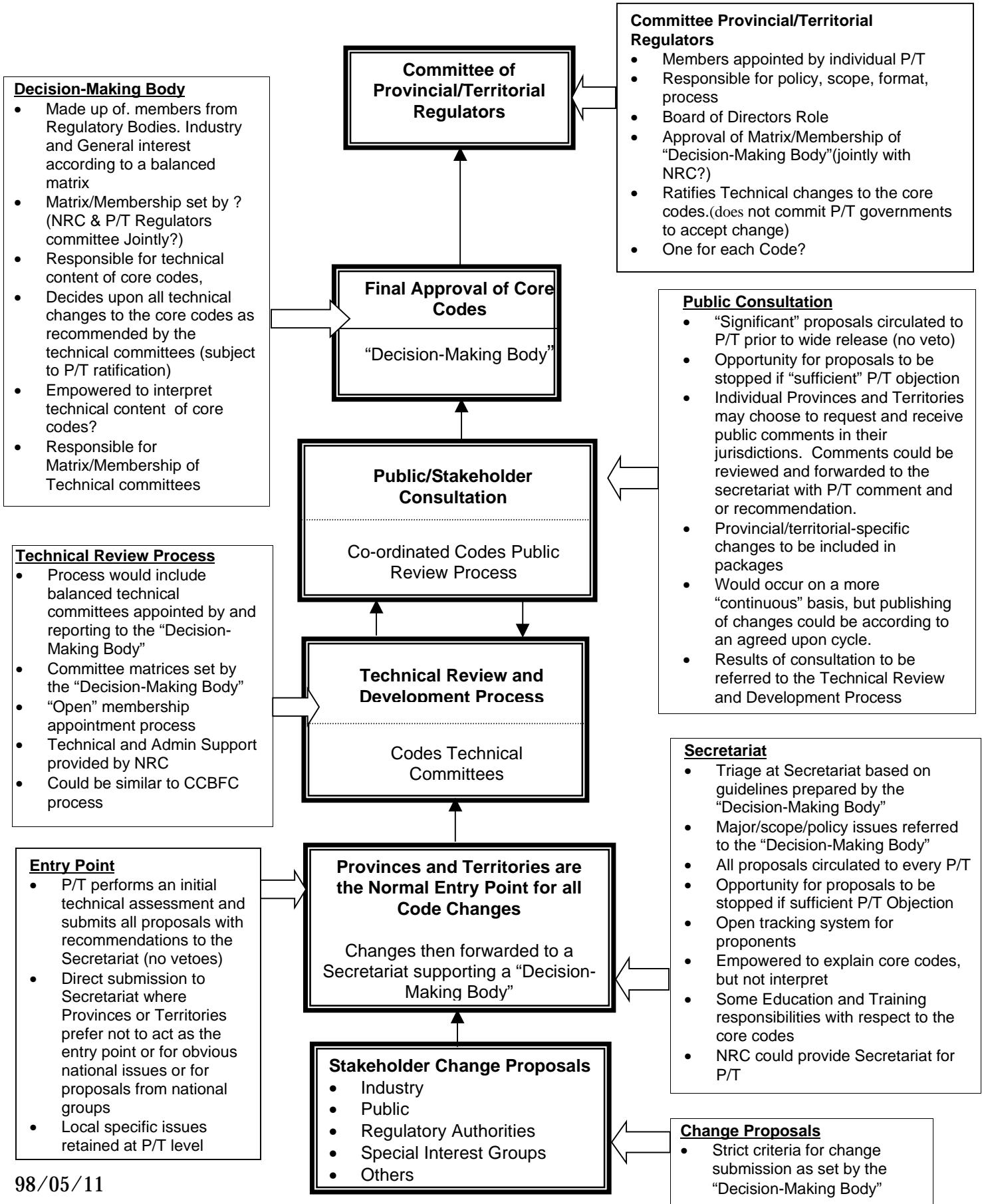
Appendix C

Discussion of Straw Models #9, #10, #11, 12

“Straw” Code Development and Review Process Mark 9 “Regulators-Only” Decision Making Body

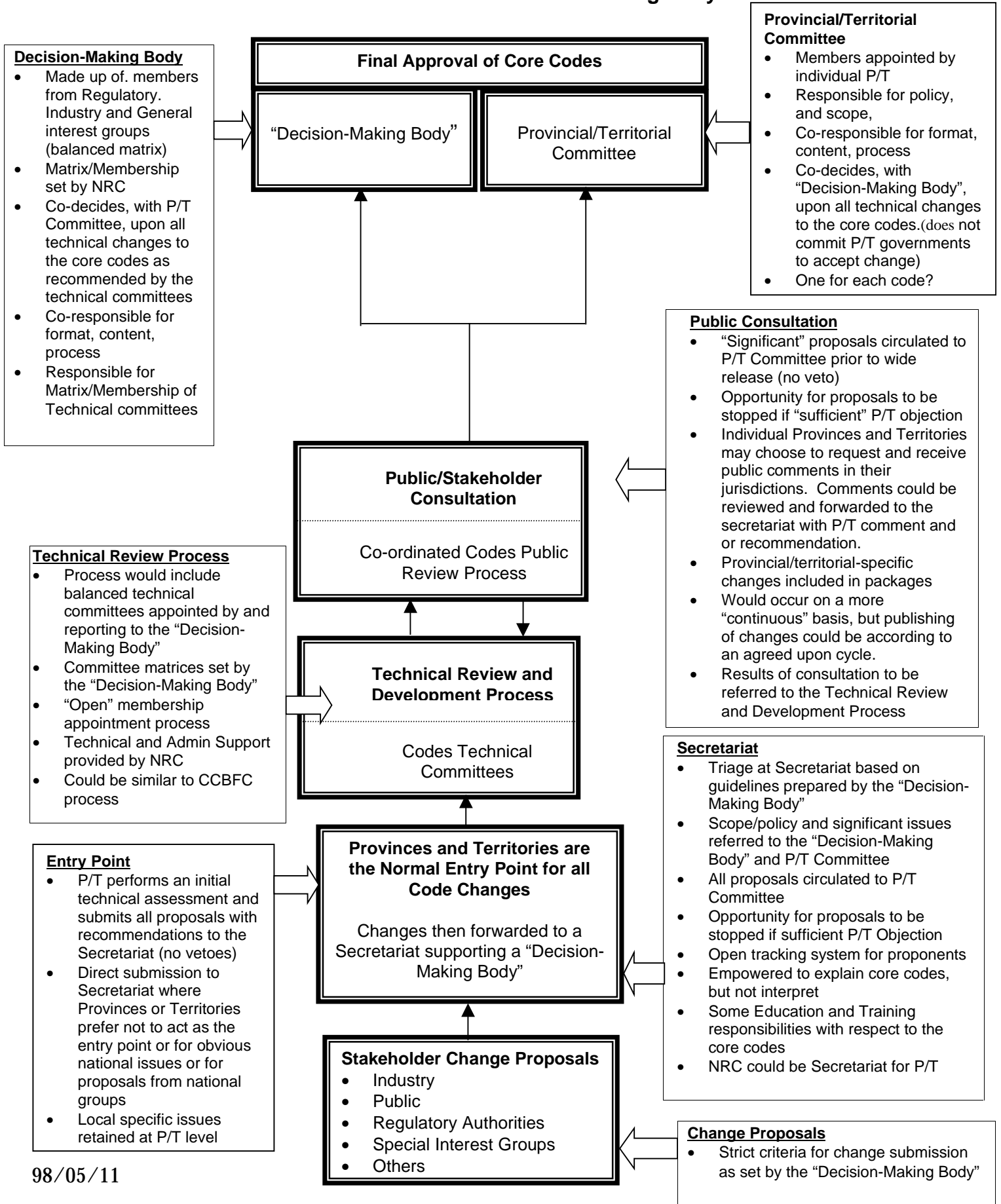


**“Straw” Code Development and Review Process
Mark 10 Committee of Provincial/Territorial Regulators plus
“Broad Consensus” Decision Making Body**



“Straw” Code Development and Review Process

Mark 11 Joint Approval of Core Codes by Provincial/Territorial Committee and “Broad Consensus” Decision Making Body



“Straw” Code Development and Review Process

Mark 12 Approval of Core Codes by “Broad Consensus” Decision Making Body with Joint Technical Approval by Provincial/Territorial Committee and Committee of Technical Committee Chairs

