

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
01-01-19 Revised definition of live load.								
01-01-20 Revised definition of post-disaster building.								
01-01-21 Revised definition of storage garage.								There appears to be no change in meeting or detail or definition; the existing definition appears to be more grammatically complete.
01-01-22 New definition of protected floor space.								See comment pertaining to proposed changes respecting interconnected floor spaces.
01-01-23 Definition of "party wall" proposed to be deleted								
01-01-24 New definitions of flight, landing and stair.								Reference is made to appendix notes. However, the proposed appendix notes are not replicated. As the appendix notes may be consequential in terms of enforcement, they should be provided to enable comment.
01-01-25 New symbol for metric reinforcing bar.								
03-01-21 New requirements for sprinkler-protected glazed wall assembly.							~	The requirement under proposed Sentence 3.1.8.13.(3) whereby in order to install a sprinkler-protected glazed wall assembly in an exit fire separation the entire building must be sprinklered, is excessive. There are many mixed use developments where upper storeys may be unsprinklered occupancies (such as office floors in a building not exceeding 6 storeys in height, or high-rise residential buildings) and which have sprinklered commercial facilities in lower storeys. Where there is no reasonable expectation of a fire in an unsprinklered storey affecting the sprinkler-protected glazed wall assembly in an exit fire separation in a sprinklered storey, the ability to install such glazed wall assembly should not be affected by the unsprinklered portion of the building. It would be more appropriate to indicate that a floor area contiguous a sprinkler-protected glazed wall assembly incorporated in an exit fire separation must be sprinklered.
03-01-01 Deletion of Sentence 3.1.2.3.(1) concerning arena type buildings; transfer of requirements to 3.2.2.					✓			
03-01-02 Replace dwelling unit with suite in description of B3 occupancies in a group home setting.					✓			

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03-01-03 Deletion of reference to Part 9 in description of materials permitted in a building permitted to be of combustible construction.	✓				✓			
03-01-04 Deletion of reference to interior finish described in Part 9 as acceptable protection for foam plastic in a building permitted to be of combustible construction.		X		X		X		We are not aware that the allowance to protect foam plastic in combustible buildings with materials permitted in Part 9 has been a problem. The reasons given for the proposed change make no reference to negative fire experience. The fact that a 4-storey building can be combustible construction if sprinklered does not appear to be a reasonable basis for making the installation of foam plastic more restrictive. A sprinklered 4-storey building would appear to be more safe from fire than an unsprinklered 3-storey building. We would have preferred to see the propose supplementary guideline information in considering the proposed change.
03-01-05 500 Maximum FS is imposed on exposed combustible insulation.								
03-01-06 Changes to description of protection of optical fibre cables and electrical wires and cables in buildings permitted of combustible construction. Allowance for cables to be concealed spaces in walls replaced with requirement that such cables be within masonry walls.		X		X		X		The indication that there would be no cost implication for the proposed change is misleading. The current wording would allow the subject cables to be installed in a drywall-clad stud wall while the proposed new Code content would restrict the cables to be in a masonry wall. This will result in the cables having to be installed in conduit in framed walls which will be a significant cost increase.
03-01-07 Clarification of required dimensions of solid sawn lumber used in heavy timber construction.								
03-01-08 Clarification of required dimensions of solid sawn lumber used in heavy timber construction.								
03-01-09 Splice plates in heavy timber construction.								
03-01-10 Reference to tying of adjoining ends of wood beams deleted.					✓			
03-01-11 Editorial change re roof arches.					✓			
03-01-12 Cross reference to requirements for interior finish in					✓			

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description of requirements for noncombustible construction.								
03-01-13 Reference to ULC S135 (Cone Calorimeter Test Standard) as a basis for accepting materials of limited combustibility in noncombustible construction.	✓		✓		✓			
03-01-14 Addition of foamed plastic air sealants to minor combustible components permitted in noncombustible construction; editorial revisions.	✓		✓		✓			
03-01-15 Relocation of Article 3.1.5.5. concerning wood decorative cladding on exterior canopy facias.					✓			
03-01-16 Specifically addressing gypsum board as allowable combustible element in noncombustible construction					✓			
03-01-17 Acceptance criteria for factory assembled panels containing foam plastic insulation.					✓			
03-01-18 Larger nonmetallic raceways permitted in noncombustible construction	✓		✓		✓			
03-01-19 Editorial change to description of allowances for wood decorative cladding in noncombustible construction.					✓			
03-01-20 Editorial change to description of a fire separation.					✓			
03-01-21 Inclusion in OBC of requirements for sprinkler-protected glazing.							~	<p>There is no need to identify a requirement for design and review by a professional engineer for sprinkler-protected glazing anymore than there is a need to identify in the body of OBC Part 3 a need for professional designer of a stair or closure or any other particular element of a building.</p> <p>The original CCMC evaluation report for the Central Sprinkler Company window sprinkler system did not specify a need for any particular entity to design a system, and the CCMC report was adopted by Ruling MR97-01-049-(12752-R) of the Minister of Housing in 1997. On this basis, the indication that a chief building official could only</p>

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								accept a window sprinkler system as an equivalent or where the permit applicant engages someone with a BMEC authorization does not appear to be correct.
03-01-22 New Sentence 3.1.8.3.(4) The continuity of a fire separation shall be maintained where it abuts another fire separation, a floor, ceiling or an exterior wall assembly.		X		X		X		Although seemingly innocuous, this proposed change will give more ammunition to the occasional inspection zealot who demands special treatment of the joints at the interface of different assemblies beyond that which has been found traditional and acceptable. For example, on rare occasions such an inspector has demanded application of listed sealants at the junction of drywall fire separations and concrete slabs, even though such construction has been acceptable for decades without such more recently evolved sealant materials. Similarly, the proposed Sentence may lead some persons to question the acceptability of an interior fire separation terminating at the inner face of an exterior wall where the exterior wall is not required to be a fire separation or rated. More explanation of what "continuity of a fire separation . . . where it abuts . . ." another assembly should be provided.
03-01-23 Editorial modification of references to standards for determining fire-protection ratings.								
03-01-24 Editorial rewording of requirement for damper where duct penetrates a fire separation.					✓			
03-01-25 Deletion of redundant Sentence regarding fire dampers.					✓			
03-01-26 Inclusion of reference to Appendix A regarding building services in fire separations and fire-rated assemblies.								How can one assess the proposed change when no information is given respecting the proposed appendix note?
03-01-27 Deletion of requirement for fire dampers in a B3 occupancy containing not more than 10 persons, not more than 6 of whom require assistance in evacuation.								
03-01-28 Deletion of indication that noncombustible sills are not required for 20 minute doors on the basis that the allowance is redundant with one contained in NFPA 80.								NFPA 80 in itself is not clear with respect to what constitutes combustible floor construction.

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03-01-29 Editorial revision of reference to wired glass and glass block					✓			
03-01-30 Change to description of fire-stopping of service penetrations whereby allowance for "tightly fitted" penetrations would be deleted.		X		X		X		The substitution of a requirement for a penetrating element in a fire separation to be "cast in place" as opposed to "tightly fitted" will have significant cost impact. In our opinion, the indication that the change "... is already being achieved in the majority of buildings" is not true, if one accepts that tightly fitted penetrations of fire separations have been accepted practice for many years. We suggest that the term "tightly fitted" be changed to "tightly fitted with no gaps around the perimeter" to address the purported problem.
03-01-31 Terminology of "collapse of framing members" proposed to be changed to "failure of the framing members" in terms of firewall design requirements.					✓			
03-01-32 Permit firewalls having rating of less than 2 h to be constructed of materials other than masonry or concrete.	✓		✓		✓			This change would allow a significant benefit for low-rise, multi-family construction and provide an advantage to Ontario builders which has been available to American builders for sometime.
03-01-33 Permit firewalls having rating of less than 2 h to be constructed of materials other than masonry or concrete.	✓		✓		✓			This change would allow a significant benefit for low-rise, multi-family construction and provide an advance to Ontario builders which has been available to American builders for sometime.
03-01-34 Clarification that fire-stopping of horizontal concealed spaces applies to floor assemblies as well as roof assemblies.					✓			
03-01-35 and 03-01-36 The requirement for fire-stopping materials in a "double wythe wall assembly at the intersection of the floor assembly on the walls".								Support the apparent intent, but the use of the term "wythe" in the context of framed stud wall assemblies is misleading. In our experience "wythe" refers to a vertical wall assembly or portion of wall assembly that is one masonry unit wide.
03-01-37 New minimum FSR for wall and ceiling finishes in B occupancies that are not sprinklered.								
03-01-38 New Subsection 3.1.17. indicating that fabric used as part of a canopy or awning must conform to ULC S108 in any type of construction.					✓			

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03-01-39 Restriction on building construction in proximity of above ground electrical conductors made more severe in that horizontal distance must be between building and maximum swing of the conductors, as opposed to the conductors themselves.		X		X		X		<p>How is the designer, builder or inspector supposed to know the “swing” of a variety of different above ground electrical conductors?</p> <p>The existing provision is of questionable fairness inasmuch as a property owner is penalised for a power transmission line on an adjacent property. The proposed change would compound this lack of fairness.</p>
03-02-01 Proposed changes to allowances for 40% “open view” mezzanine.		X		X		X		<p>Although there is admittedly an element of awkwardness in the Code descriptions concerning mezzanines, these descriptions are longstanding and certain of them should not be disposed of.</p> <p>The indication that the space above a mezzanine described in OBC 3.2.1.1.(3) is to be “used exclusively for seating purposes” is at odds with almost 30 years of use and application of the OBC. Despite a purported original intent to govern balcony seating design in theatres, the so called 40% mezzanine has been used for a wide variety of uses in different occupancies.</p> <p>A popular townhouse design incorporates a 4th level open mezzanine loft overlooking a master bedroom suite. This loft may be used as den or lounge and offers a considerable amenity and increase in net floor area for such townhouse designs without having the building construed to be over 3 storeys in height. There are many examples of this sort of design in Ontario and the proposed amendment would do away with it without any indication of problem.</p> <p>The indication that the mezzanine space be “used as an open area without partitions or subdividing walls” is less precise than the existing requirement that there be “no visual obstructions more than 1070 mm above the floor”. It is possible that relatively low space dividers could be construed to be subdividing walls not permitted under the new wording.</p> <p>The indication in the justification that “at present the Code places restrictions on the use of space beneath the mezzanine for open mezzanines . . .” is not accurate with respect to the OBC.</p>

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03-02-01 Continued								The assertion that the change reflects existing intent belies the widespread use of the 40% mezzanine allowance for a variety of occupancies as well as the specific exemption which has existed since the inception of the OBC for visual obstructions in a form of library stacks.
03-02-02 Change to description of 10% mezzanine; requirement that area of mezzanine be added to area of whole storey for purposes of determining building area.	✓	X	✓	X			~	<p>There are two significant changes in this proposal.</p> <p>The changes which indicate that a mezzanine would not exceed 10% of the floor area and 10% of a suite if the mezzanine is contained in a suite are appropriate and would avoid some unduly restrictive interpretations that some plans examiners are placing on the 10% allowance, such as where a roof-top amenity facility in an apartment building is not accepted because it must be part of a suite, as opposed to a floor area. This aspect of the proposed change is agreeable.</p> <p>We disagree with adding the area of the mezzanine to area of the storey for purposes of determining building area of the storey. This was never done in the past and there has been no indication of a problem (other than the conceptual one). Additionally, the use of the term building area in respect of a storey is confusing; building area has always been understood to be the greatest lateral extent of a building from a bird's eye point of view. We disagree with proposed Clause 3.2.1.1.(4)(b).</p>
03-02-03 Reference to "room or storey" changed to "storey" in describing requirement the superimposed mezzanines to be considered as storeys, except for the first level of mezzanine.								
03-02-04 Change in description of elevated walkways and platforms not required to be considered storeys in building height.	✓	X	✓	X			~	<p>There are advantages and disadvantages to the proposed change. Advantages include the ability to apply the allowance to occupancies other than industrial, as well as industrial.</p> <p>The disadvantage relates to the removal of the allowance for an occupant load of up to 4 persons for an elevated walkway platform or mezzanine. This suggests that platforms occupied for extended periods by equipment operators (such as a crane operator in a mill or someone monitoring displays in a manufacturing process) would not be permitted</p>

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								on a structure not considered a storey in building height. As the allowance for a limited occupant load in industrial occupancies has been used successfully and without apparent problems for a period of years, it does not seem reasonable to remove this allowance.
03-02-05 Allowance for up to 10% of the area of a room in which an open "40%" mezzanine is located to be enclosed on the mezzanine floor.	✓		✓		✓			
03-02-06 New requirement indicating that if space beneath a 40% mezzanine is wholly or partly enclosed in a non-sprinklered storey, the mezzanine floor has to be constructed as a fire separation rated as would be required for floor assemblies.		X		X		X		This change would have the effect of increasing the fire-resistance rating for mezzanine floor assemblies compared to what has been accepted for many years in the OBC, without justification based on negative experience.
03-02-07 Editorial revisions to requirements for buildings to face streets.								
03-02-08 Editorial revisions to requirements for arena type buildings used for trade shows and similar exhibitions.								
03-02-09 Editorial revisions to requirements for arena type buildings used for trade shows and similar exhibitions.								
03-02-10 Requirements for walkways relocated to Subsection 3.2.2. Restriction that a walkway must be used only as a pedestrian thoroughfare in order not to have to conform to 3.2.3.13. and 3.2.3.14. deleted.	✓		✓		✓			
03-02-11 Maximum required FRR of fire separations between compartments with separate exposing building faces to be not less than 45 minutes. Change the description of allowance for each floor of an interconnected floor space to be considered a separate exposing building face.	✓	X	✓	X			~	Reducing the minimum fire-resistance rating of fire separations between fire compartments having exposing building faces to 45 minutes is appropriate, given the assumption that the requirements of Subsection 3.2.3. are predicated on firefighters being able to reach a building within 10 minutes of an alarm being received. The requirement that a building be fully sprinklered under proposed Sentence 3.2.3.2.(3) is excessive. As we have noted previously, there are many examples of mixed use buildings with sprinklered commercial facilities on lower levels and unsprinklered residential storeys on upper

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								<p>levels. The presence of the unsprinklered upper storeys has no impact on the potential for fire to spread within an interconnected floor space in lower levels. The allowance contained in proposed Sentence (3) should be based upon storeys containing an interconnected floor space being sprinklered, and not the entire building being sprinklered. A comparison can be made with the allowance proposed for new Article 3.2.1.6. under Proposed Change No. 03-02-06 whereby reference is made to a mezzanine being located in storey that is not sprinklered throughout (as opposed to a building which is not sprinklered throughout).</p> <p>The indication in the justification that the OBC permits D occupancy buildings to be of any height and any area and not be sprinklered is not correct. Under OBC 3.2.2.49. a Group D building regulated by OBC 3.2.6. must be sprinklered.</p>
03-02-12 Proposed deletion of requirement that a party wall be constructed as a firewall.	✓		✓				~	<p>We agree that the requirement that a party wall be constructed as a firewall has had an inhibiting effect on development of a building that spans a property line, even where there is agreement between the separate property owners respecting the joint operation of the building.</p> <p>However, there are concerns that where there is no agreement between adjacent property owners, one party could erect a wall on a property line which is not a firewall to the disadvantage (in terms of potential hazard) to the neighbouring property. This sort of situation could, for example, arise where existing buildings share a firewall and one building is extended upwards. In this case, what other Code content would oblige the extended wall on the property line to be constructed as a firewall?</p> <p>It may be worth considering that the existing Sentence be changed such that a party wall need not be constructed as a firewall if owners of the adjacent property has some sort of agreement respecting the joint use of the two properties or the joint maintenance of a building straddling the two properties. A developed commentary in the appendix may also help in addressing situations where a party wall need not be constructed as a firewall or, where a building may straddle a property line without a</p>

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								party wall or firewall at the property line.
03-02-13 Relocation of Sentence 3.2.3.7.(7) concerning protection of foamed plastic insulation in exterior walls of buildings exceeding 3 storeys in height.					✓			
03-02-14 Relocation of Sentence 3.2.3.7.(7) concerning protection of foamed plastic insulation in exterior walls of buildings exceeding 3 storeys in height.					✓			
03-02-15 Relocation of Sentence 3.2.3.7.(7) concerning protection of foamed plastic insulation in exterior walls of buildings exceeding 3 storeys in height.					✓			
03-02-16 New Sentence clarifying that construction requirements for an exposing building face are to be satisfied before applying increased opening areas allowed by utilization of glass block or wired glass.					✓			
03-02-17 Editorial revisions to description of protection required for structural members wholly or partly outside an exterior face of a building.							~	Grammatically, proposed Sentence 3.2.3.8.(1) may be improved if the words "that are" are inserted directly before the words "place wholly or partly" and "and" is placed directly between the words "exterior face of a building" and "that are less than 3 m".
03-02-18 Allowance for increasing area of unprotected openings through utilization of wired glass or glass block modified to indicate that the allowance would only occur in a building in which an automatic sprinkler system is not installed and the new Sentence 3.2.3.7.(10) (requiring construction requirements for the exposing building face to be satisfied before applying increased areas of unprotected openings) is cross-referenced.		X		X		X		The indication that there is no impact with this change is incorrect. The wording in 1997 OBC 3.2.3.11.(1) makes no reference to a building or fire compartment being sprinklered. On this basis, the allowable unprotected openings in the exposing building face of the sprinklered fire compartment may be doubled if glass block or wired glass assemblies are used. The proposed change would restrict the allowance to double areas of unprotected openings with wired glass or glass block to buildings which are not sprinklered. In the past, Building Code Branch opinion held that if a fire compartment was sprinklered and wall openings were provided with wired glass or glass block, the allowable area of unprotected openings could be quadrupled, compared to a base-case situation where the fire compartment was not sprinklered.
03-02-19 Relocating and editorial revisions to requirements for construction of exposing building faces using foamed plastic					✓			

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insulation in an exterior wall.								
03-02-20 Reference to “storeys below-grade” in OBC 3.2.4.1. concerning determination of requirement for a fire alarm system changed to “storeys below the first storey”.					✓			
03-02-21 With respect to a two-stage fire alarm system, description of activation of alarm signal by key may sound in a “zone or zones” instead of merely “to sound”.	✓				✓			
03-02-22 Clarification that voice communication system is not independent of a fire alarm system.								
03-02-23 Indication that a fire alarm system is to be “verified” as opposed to “tested” in conformance with standards for verification of fire alarm systems.					✓			
03-02-24 Editorial change to description for required signals to fire department from sprinkler system waterflow.					✓			
03-02-25 Deletion of references to standards no longer available with respect to notification of fire department of alarm activation.					✓			
03-02-26 Reference to lack of availability of means to contact fire department deleted.								
03-02-27 Modification of requirements for signals to fire department to ensure that unsprinklered assembly occupancy buildings with an occupant load exceeding 300 will have automatic notification of fire alarm activation to fire department.								
03-02-28 Deletion of requirements pertaining to reporting of signal and supervision circuits and connection of annunciators and trouble signal devices to main control units on basis that the requirement is redundant to the referenced fire alarm standard.					✓			
03-02-29 Separate annunciator at building entrance not required if fire alarm control unit is in close proximity to entrance and provides	✓		✓		✓			A discussion in the appendix of what “in close proximity” means may be helpful.

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indicators that would be required for annunciator.								
03-03-30 Requirement for provision of signals to staff in B occupancies relocated; audible and visible signal required instead of visual signal only.					✓			The appendix note should clarify that devices which provide the audible and visible signal to staff are not deemed to be part of the fire alarm system.
03-03-31 Proposed modification to requirements for monitoring waterflow detecting devices through fire alarm system.							~	Sentence 3.4.16.2. in the 1997 OBC is different from the corresponding Sentence in the NBC in that the words "if a fire alarm system is provided" are appended to the end of the Sentence. This OBC modification should be maintained in the proposed new Sentence.
03-03-32 Pull stations to be required at all exits from a floor area, not only at required exits.		X		X		X		<p>The indication that pull stations are to be installed in floor areas is appropriate, if it will avoid a circumstance where pull stations are provided both at doors from floor areas into exit enclosures and at exit doors leading out of exit enclosures.</p> <p>The proposed change would have the disadvantage of requiring pull stations within residential suites at patio doors or at doors which are not required for exits. Such additional pull stations would be costly and visually unattractive in a dwelling unit. Unless there is a significant problem based on experience, the purest notion that every door leading to the outside from a building should have a pull station is not sufficient reason for the change.</p> <p>For information, we note that Section 9.6. of the 2003 edition of NFPA 101 requires a pull station to be provided near each required exit from an area. Additionally, fire alarm systems using automatic fire detection and waterflow detection as a basis for activation require only one manual pull station.</p>
03-03-33 Visual alarm signal devices to be installed in at least 10% of hotel and motel suites.				X		X		Existing provisions that mandate visual signal devices in facilities which are intended for use primarily by persons with hearing impairments is sensible. Scattering visual signal appliances throughout 10% of hotel and motel suites when there is no guarantee that such suites will necessarily be available to persons with hearing disabilities would appear to provide no quantifiable benefit.
03-03-34 Additional requirement for visual signal devices in public								Would it make sense to provide visual signal devices in public corridors

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corridors serving A, B, D or E occupancies, corridors used by the public, and in floor areas or portions thereof where the public may congregate in Group A occupancies. Visual signal devices not required in classrooms and in B3 occupancies for not more than 10 persons not more 6 of whom require assistance in evacuation.				X		X		<p>serving B, D or E occupancies and have no such devices in the occupancies themselves? Occupants of B occupancies suites may be expected to spend much more time within their suites than in public corridors providing access to exit from such suites. There may be many more people in large mercantile occupancies than in public corridors outside of such occupancies. Why would a low occupant load, small Group A occupancy (such as a small art gallery) suffer the need to install visual signal devices where a much larger suite of D or E occupancies would not?</p> <p>Apart from public relations, the benefit of the proposed change appears to be questionable in the context of cost. No data are presented as to the portion of the population that would benefit from visual signal devices. Buildings with relatively low occupant loads and small tenancies would be affected on the same basis as much larger buildings with higher numbers of people.</p>
03-03-35 Editorial revision to description of audibility of alarm systems.					✓			
03-03-36 Editorial revision to requirements for audibility of alarm systems with respect to residential occupancies.								
03-03-37 Cross-reference to new Code Sentence respecting audibility of alarm systems in dwelling units.								
03-03-38 Modification of requirement that disconnection of or damage to signal device in a dwelling will not interfere with the ability of devices in other dwelling units or public corridors to sound an alarm.								<p>The necessity of the restriction contained in OBC 3.2.4.19.(10) and the existing OBC (or NBC) was never justified on a cost benefit basis. Furthermore, its inclusion has caused endless headaches and the expenditure of vast amounts of money in response to inconsistent and gradually evolving opinion (or deviation, or invention) as to the intent of the Code requirement in the current Code cycle.</p> <p>The justification provided for the proposed change is a further example of the lack of connection between what is said to explain background and what the Code content actually says. A proposed change appears to be an improvement in that it refers to “disconnection of, or tampering</p>

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								<p>with” an audible signal device as opposed to “disconnection of, or damage to” such device. “Disconnection of or tampering with” does not at all infer damage to such device or the wiring associated with such device in the event of fire in the suite where the device is installed. However, that appears to be part of the rationale for the change contained in the first paragraph of justification. If persons responsible for promoting the inclusion of 3.24.19.10. in the Code wish to claim that fire damage is intended to be addressed by the Code provision, the Code provision should literally talk about fire damage.</p> <p>The construction and enforcement activity associated with this Code requirement has been so negative, in the residential construction industry’s experience in Ontario, that the subject deserves a separate task group for review.</p>
03-03-39 New Sentence requiring audible signal devices serving dwelling units in apartment buildings to be on separate signal circuits from the audible signal devices outside of dwelling units		X		X				<p>There is a significant cost increment associated with providing an additional circuit for signalling appliances on each floor. There is a further cost increment for forcing these circuits to utilize Class A wiring. What cost benefit justification is there for these changes?</p> <p>The dubious requirement that line isolators be installed to isolate damaged signalling appliance devices or circuits in residential suites from the remainder of the building that has evolved under the current OBC (in the Toronto area, at least) is purported to respond to the requirement contained in OBC 3.2.4.19.(10). There is nothing in the existing Code which says that Class A circuits must be used. A case has not been made that demonstrates the necessity of Class A circuits. There are many, many existing fire alarm installations in residential buildings which do not use Class A circuits and the fire alarm systems appear to be working well and properly. This appears to be the result of conceptual perfectionism and continues the saga of vast increases in cost for fire alarm systems – particularly signal appliance circuits – in apartment buildings.</p> <p>Again, the whole topic deserves a separate review.</p>
03-02-40 A new alternative to the silencing provision for signalling								Inasmuch as the proposal involves a choice of means of silencing alarm

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devices in dwelling units. The fire alarm system will automatically silence the devices serving dwelling units after 60 seconds of operation, subsequent alarms in the building will reactivate the devices, a voice communication system is apparently required and the alarm will resume after 10 minutes if it is not acknowledged.							~	signals in suites, it appears to be helpful although it will be up to individual owners to determine whether or not one method has an advantage over the other. Voice communication systems are required in buildings exceeding 36 m. It would appear that the ability use the new allowance is contingent upon there being a voice communication system, but the proposed wording does not make this explicit.
03-02-41 New Sentence 3.2.4.19.(14) would require sound pressure level inside the entrance to a dwelling unit to be not less than 65 dba for signal originating from audible signal device outside the unit in the corridor.								Has there been any testing of recent construction to ascertain whether or not this proposal is feasible? The increasing attention being paid to sound attenuation in the design of enclosing elements for apartment suites should be considered. Will the sound pressure level in the corridor be too extreme?
03-02-42 New Sentence addressing silencing requirements for 2-stage systems such that any previously silenced signal device circuits in residential occupancies must be re-actuated at commencement of second stage of system activation.								
03-02-43 Relocation of requirement for visual signals from smoke detectors to be provided for staff in B occupancies.								See comments under Change No. 03-02-30.
03-02-44 New Sentence requiring differentiation between sound patterns of smoke alarms and temporal patterns of alarm signals.					✓			
03-02-45 Minimum period for alarm signals sounding before silencing to permit voice message changed to 30 seconds for all occupancies.					✓			
03-02-46 Reductions in period of time that alert signal must sound before silencing.					✓			
03-02-47 Requirement that voice communication system be designed so that voice instruction can be transmitted selectively to any zone or zones while maintaining an alert or alarm signal to other zones modify to address 2-stage systems only.		X				X		The proposed revision is more restrictive in that it applies only to a 2-stage system. The existing Sentence is more flexible and it appears that there is no need to change it.
03-02-48 New requirement for voice communication system in bulk				X		X		The description of problem under rationale does not provide any data

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
not be protected with other material where it has been successfully tested.	✓		✓		✓			
03-02-54 Proposed provision in 3.2.6. of the OBC to require access to a balcony in a dwelling unit to be over a threshold not more than 13 mm above the walking surface.		X		X		X		<p>The explanatory text accompanying this proposed change is confusing. Under Description of Proposed Amendment it suggested that the small projection of the balcony door will result in high maintenance due to water ingress. Under the Description of Problem, there is an indication that a BBC (sic) panel “ruled that the balcony need be barrier-free where protection and floor area is required”. It is also indicated that the proposed change would harmonize with the National Building Code and there would be less ongoing costs to tenants.</p> <p>The Building Code Commission (BCC) ruled, in effect, that existing OBC 3.8.2.1.(3) need only be applied where access to balconies was used as a method of satisfying OBC 3.3.1.7.(2). If another method was used to satisfy OBC 3.3.1.7.(2), then apartment building designers would be free to have the conventional raised sill (which may be 6 to 10 in. high) at patio doors leading to exterior, private balconies. These balconies with the raised sills have been deemed to satisfy the provisions of OBC 3.2.6.6.(1)(a) since the inception of the Ontario Building Code, and have nothing to do with provisions for barrier-free design in day-to-day use or for safety in floor areas having a barrier-free path of travel under OBC 3.3.1.7.</p> <p>It would entirely contradict the ruling of the BCC with respect to balcony access if the proposed change was to go ahead.</p>
03-02-54 Continued								<p>In order to clarify the OBC in a manner that would be consistent with the BCC rules, OBC 3.8.2.1.(3) should be modified to indicate that the requirements contained therein apply only to balconies in dwelling units where the balconies are provided to satisfy the provisions of OBC 3.3.1.7. Otherwise, as a barrier-free path of travel does not lead throughout a residential suite, there is no need for it to lead to a private balcony accessed from such suite.</p> <p>It is recognized that exterior terraces and balconies used by the general population of a building and not accessed through a private residential</p>

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
								suite are susceptible to requirements for barrier-free access. Presumably this would also mean restrictions on the design of the threshold at a door leading to such terrace or balcony.
03-02-55								See proposed Change No. 03-02-63.
03-02-56 Proposed deletion of cross-reference to OBC Part 9 for illumination levels of rooms and spaces used by the public.					✓			
03-02-57 Expansion of requirements for emergency lighting to cover daycare, food preparation areas in commercial kitchens and service rooms.				X	✓			
03-02-58								See comment on Change No. 03-02-57.
03-02-59 Battery operated emergency lighting mandated for critical care patient areas through reference to CSA-Z32.					✓			
03-02-60 Editorial amendment to Sentence referencing CSA-C282-M Emergency Electrical Power Supply for Buildings.							~	It should be made clear that the description in CSA-C82-M requiring a 2 h rated fire separation around generator rooms does not apply. The Code requires a 1 h rating.
03-02-61 Editorial change concerning emergency power for hospitals.					✓			
03-02-62 Revision to emergency power requirements for fire alarm systems clarifying that voice communication may be part of a fire alarm system.					✓			
03-02-63 New Article incorporating significant revisions to requirements for protection of electrical conductors for emergency equipment described in 3.2.6.2. to 3.2.6.8. and in 3.3.3.							~	For decades, the NBC and OBC had no requirement for fire-resistance rating of electrical conductors for emergency equipment, except for a requirement for such protection for conductors serving emergency equipment in high-rise buildings. That requirement had been for a 1 h rating, except for the anomalous change in the 1997 OBC requiring a 2 h . The reversion to a 1 h rating and proposed Sentence 3.2.7.10.(2) is appropriate, based on long experience. In the past, the extent of the 1 h protection for the conductors for emergency equipment in high-rise buildings was literally unclear. In

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
								<p>extreme cases, it could be interpreted that 1 h (or 2 h) ratings were required for conductors up to and including every device in a fire alarm system. Generally, the requirement for a rating was applied to risers penetrating multiple storeys of a building, but generally not to branch or zone circuits for fire alarm systems within individual storeys or suites.</p> <p>This principle seems to be followed in proposed Sentence 3.2.7.10.(7), although the reference to “branch circuits within a storey that connect transponders and individual devices” still begs a couple of questions. What if there are no transponders and fire alarm circuits all rise from a single control unit. An individual circuit may serve only one storey but it may be installed with a number of other circuits in a riser until it branches out into the storey. Additionally, there are some designs (residential in particular) where there are two- or three-storey suites which may contain devices connected to the fire alarm system. In this case, the suite is part of a single fire compartment but it occupies space on more than one storey of a building. It does not seem appropriate to require 1 h rated conductors for the fire alarm zone serving such multi-level suites.</p> <p>With respect to proposed Sentence 3.2.7.10.(8), it is pointed out that distribution wiring for emergency lighting was often fed to three storeys from a panel located in the middle of such three storeys. If non-rated conductors were used between this panel and the emergency lighting units on three storeys, the proposed change would require a separate panel for emergency lighting units on each storey. We are not aware that there has been any problem with the older arrangement.</p>
03-02-63 Continued								It would have been preferable to be able to review the proposed Appendix A content.
03-02-64 Changes to allowances whereby a mezzanine need not terminate at vertical fire separation or be protected in conformance with 3.2.8.3.to 3.2.8.11.								See our comments in respect of Proposed Changes 03-02-01 and 03-02-02.

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
03-02-65 Reference to permitted "occupancies" in 2-storey interconnected floor space (comprising first storey and one adjacent storey) changed to "major occupancy".		X		X		X		<p>The proposed change concerns OBC Sentence 3.2.8.2.(6) which deals with 2-storey interconnected floor spaces and not with mezzanines as are addressed in the discussion following the proposed change.</p> <p>The reference to <u>major</u> occupancies in Clause (c) will be disadvantageous for design flexibility. Under the current wording it is possible to have a 2-storey interconnected floor space containing an occupancy classification which is a subsidiary to major occupancy but which, of and my itself, is not a major occupancy. For example a 2-storey interconnected office space may be designed as a subsidiary component of a large residential complex. Another common example is a subsidiary assembly occupancy in a building of Group B2 or B2 major occupancy. The proposed change would encourage enforcers to deny such designs which have been used successfully in the past.</p> <p>There is no "and" at the end of Clause 3.2.8.2.(6)(c) in the OBC. However, the "and" is present in the comparable NBC Clause. Is it intended that OBC 3.2.8.2.(6) be deleted in favour of the comparable Sentence in the NBC?</p>
03-02-66 Deletion of OBC Articles 3.2.8.3. to 3.2.8.11. (governing large atrium-type interconnected floor space design) and substitution of NBC Articles 3.2.8.3. to 3.2.8.9.	✓	X	✓	X		X		<p>As was noted in the impact statement following the proposed change, elimination of the "9 m cylinder" would increase design flexibility. The imaginary cylinder requirement contained in the OBC is especially onerous for small buildings or relatively low-rise interconnected floor spaces.</p> <p>In most other respects, the current provisions of the OBC respecting interconnected floor space design for large atrium-type interconnected floor spaces are superior to those contained in the NBC, in terms of design freedom, cost and flexibility.</p> <p>We disagree with proposed Sentence 3.2.8.3.(1). The OBC straightforwardly permits construction of buildings containing interconnected floor spaces to be governed solely by OBC 3.2.2.</p> <p>We disagree with proposed Sentence 3.2.8.4.(1). The OBC indication that "storeys that are wholly or partially within an interconnected floor</p>

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
								<p>space and all storeys below an interconnected floor shall be sprinklered” is a superior requirement. There are many projects containing residential apartments situated above lower storeys containing an interconnected floor space which may or may not be part of the residential function of the building. Provided the storeys containing the interconnected floor spaces are sprinklered, there is no justification in sprinklering storeys above the interconnected floor space due to the presence of the interconnected floor space.</p> <p>The 1997 OBC also permits office buildings up to 36 m in height not to be sprinklered, as long as they were not subject to OBC 3.2.6. Again, designs which incorporate sprinklered storeys with an interconnected floor space at the bottom of the building also permit unsprinklered (and relatively low hazard) office storeys above such interconnected floor space.</p>
03-02-66 Continued								<p>Proposed Sentence 3.2.8.5.(1) describing the necessity of having exits opening into an interconnected floor space being protected by vestibules is also disagreeable to us. This provision would apply even with a relatively small 3- or 4-storey interconnected floor space. The provisions of the OBC with respect to exits offer considerably more flexibility and are more cost-effective in terms of utilization of floor space. Additionally, they have remained essentially unchanged for 20 years and have had a wide, and apparently successful application.</p> <p>We also disagree with proposed Sentence 3.2.8.5.(2) which would have the effect of requiring exits opening into interconnected floor spaces to conform to NBC 3.4.3.2. The OBC offers greater flexibility than the NBC with respect to provision of refuge capacity in exit stairs or in portions of floor areas adjacent to exit stairs than does the NBC.</p> <p>Proposed Sentence 3.2.8.5.(3) is similar to the requirements of OBC 3.2.8.5., except that the allowance contained in OBC 3.2.8.5.(2) whereby elevator doors opening to the lowest level of an interconnected floor space are not required to be protected by vestibules is not present. The OBC allowance with respect to elevators opening into the lowest level of an interconnected floor space is reasonable both from a point of</p>

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
								<p>view of an apprehension about smoke rising within an interconnected floor space and the type of design which is preferable to have in the public circulation space that one would expect to find at the lowest level of an atrium.</p> <p>Proposed Article 3.2.8.6. concerning “protected floor space” could be a useful addition to the OBC, but would have to be reviewed in the context of the details of such potential application.</p>
03-02-66 Continued								<p>We disagree with proposed Sentence 3.2.8.7.(1) concerning draft stops. We understood that the determination of whether or not draft stops would be required in a atrium-type interconnected floor space was considered at length by previous Ontario task groups on interconnected floor space design. It is reasonable to leave the determination as whether such draft stops are necessary up to the mechanical and architectural designers. We note that American codes – including NFPA 13 – have not required draft stops around large floor openings such as one would find in atrium buildings.</p> <p>We agree with proposed Article 3.2.8.8. It is simpler than the comparable OBC requirement (which requires 6 air changes per hour, except that 4 air changes per hour may be utilized in very large interconnected floor spaces) and we are aware that, based on information contained in the Supplementary Guidelines concerning smoke control in high-rise buildings, it is at least debatable to term the mechanical exhaust system as “smoke control”. Whether or not there are 6 or 4 air changes per hour, it would take a considerable period of time for a tenable atmosphere to be reached after cessation of a fire.</p> <p>The OBC requirements for smoke control do, however, enable a smoke exhaust system to contribute to life safety during a fire by requiring designs to inhibit the passage of smoke into portions of an interconnected floor space remote from the site of a fire.</p> <p>We disagree with inclusion of proposed Sentence 3.2.8.9.(1) in the Building Code. While it may be a reasonable requirement, it relates to</p>

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
								building use and should more appropriately be contained in the Ontario Fire Code.
03-02-66 Continued								<p>In summary, the proposed deletion of the existing OBC Articles 3.2.8.3. to 3.2.8.11. and the substitution of NBC requirements for interconnected floor space design would have several negative effects and offer significant benefit only in terms of the deletion of the imaginary cylinder requirement and the elimination of restrictions on travel distance to those that would be acceptable in an unsprinklered building. If the imaginary cylinder rule could be deleted from the OBC (perhaps for interconnected floor spaces up to a certain height) and the provisions of OBC 3.2.8.4.(4) could be deleted, the OBC would be vastly preferable to the requirements contained in NBC 3.2.8.3. to 3.2.8.9.</p> <p>In the past, changes to OBC requirements relative to interconnected floor space design were developed in the context of consideration by a specially formulated task group. In our opinion, the magnitude of the changes proposed is too great for fleeting consideration only by the advisory group put together to consider the entirety of proposed changes to OBC Part 3.</p>
03-02-67								See comments pertaining to Proposed Change 03-02-66
03-03-01 (Not applicable.)								
03-03-02 Editorial change to description of required means of egress from roofs.					✓			
03-03-04 Requirements for public corridor and separations modified so that reference to fire separation only applies to the remainder of the storey. Except as required for institutional residential occupancies, a fire separation is not required between a public corridor and the remainder of a sprinklered storey provided travel distance from any part of the floor area does not exceed 45 m.	✓		✓		✓			Are the words “notwithstanding Sentence 3.4.2.4.(2)” really necessary in proposed Sentence 3.3.1.4.(4)?
03-03-05 Addition of an Appendix note in respect of Article 3.3.1.7. requiring an elevator used as a means of protection for floor areas with		X		X		X		No real justification is provided for this proposal. The reference to ADA regulation provides no detail.

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
a barrier-free path of travel to be served by a lobby or corridor that serves as an area of rescue assistance.								<p>It should be born in mind that the provisions of 3.3.1.7. can apply to a 2-storey building which could, conceivably, utilize a firefighters' elevator for purposes of OBC 3.3.1.7.</p> <p>The Appendix note reference to a lobby or corridor infers that such space is going to be separated from the remainder of the floor area, but does not make this clear.</p> <p>Are two "rescue spaces" required for an occupant load of 1 person?</p> <p>The wording of the proposed Appendix note is mandatory (i.e. "is to be served . . ."). Mandatory requirements belong in the regulation , and not in an appendix which is not part of the regulation.</p>
03-03-06 Reference to a "door acting as a closure" in a fire separation which subdivides a floor area for purposes of protection where there is a barrier-free path of travel changed to "a closure in a fire separation". Sentence refers to weatherstripping or other design features intended to retard passage of smoke.								<p>If it is intended that a damper installed in the fire separation be of the leakage- or smoke-rated type, the Code or Appendix note should clearly say so.</p>
03-03-07 Requirement that occupancy not reduce the obstructed width of certain types of corridors expanded to require that occupancy not reduce the unobstructed width of any corridor to less than its required width.					✓			
03-03-08 New section indicating that "aisles shall be provided in conformance with the Fire Code".		X		X		X		<p>Fire Code requirements for aisles contained in OFC 2.7 are extremely limiting. Where applied, they can affect not only elements of the building but the layout of furnishings.</p> <p>As requirements pertaining to aisles in assembly occupancies in OFC 2.7 appear to relate to non-fixed seating, there does not appear to be a need to cross-reference this matter in the Building Code which relates to the building itself.</p> <p>The proposed Sentence would appear to encourage building officials to get involved in furniture layouts.</p>

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
								Prior to the adoption of any requirement in the OBC restricting the design of "aisles" beyond those restrictions which are already in requirements for fixed seating there should be a review of other documents (particularly NFPA 101) which have evolved as a result of a more detailed consideration of layout requirements than appeared to have been used as a basis for the Fire Code requirements for aisles.
03-03-09 Non-exit stairs required to meet slip-resistant and nosing demarcation requirements applicable to exit stairs.		X		X		X		<p>The proposed change would limit design freedom for purposes of interior decor and enhance the opportunities for litigation.</p> <p>Although the surfaces of exit facilities (including ramps, landing and treads) are required to be "slip-resistant" there is no description of what slip-resistant means. It is our understanding that litigation concerning "slip and fall" incidents sometimes involves a extensive debate as to degrees of slip-resistance. The purposed change would extend the opportunity for such expensive debate and litigation into non-exit stair situations.</p>
03-03-09 Continued								<p>The requirement currently in OBC 3.4.6.1.(1)(b) for "colour contrast or a distinctive pattern to demarcate the leading edge of the tread" is already somewhat vague, and can be disruptive if applied severely to ordinary concrete or metal pan stairs. Again, extending a somewhat vague requirement to non-exit stairs has a potential to be disruptive and costly without quantifiable benefits.</p> <p>We would rather see supplementary or appendix material developed which would provide positive guidance with respect to avoiding possible missteps with appropriate design measures.</p>
0-03-10 Clarification that general requirements for 1070 mm high guards does not apply to guards serving seating areas regulated by 3.3.2.8.					✓			
0-03-11 Editorial change re allowance that guard height restrictions do not apply at the front of stages, floor pits and repair garages on loading docks.					✓			

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
0-03-12 Editorial changes to restrictions on rooms used for welding and cutting; requirements not to apply to industrial occupancy where welding and cutting operations do not present a fire or explosion hazard to adjacent areas.	✓		✓		✓			
0-03-13 Scope sentence for requirements pertaining to assembly occupancies modified to clarify application to outdoor places of assembly.								
0-03-14 Deletion of Clause addressing requirement for steps in aisles of A4 occupancy where the slope of the aisle is more than 1 in 8 due to fact that same requirement exists for assembly occupancies in general.								
0-03-15 Deletion of separate description of steps in an aisle in an outdoor assembly occupancy.								
0-03-16 Proposal to restrict opening between footboards and seats in rows of bleacher seats so that passage of 100 mm diameter sphere would not be permitted.		X		X				
0-03-17 Editorial revision to scope sentence for Subsection 3.3.3.					✓			
0-03-18 Fire separation requirements for B3 occupancies accommodating not more than 10 persons not more than 6 whom require assistance in evacuation proposed to be liberalized.	✓		✓		✓			
03-03-19 Restriction on dead-end corridors extended to corridor serving a contained use area.								
03-03-20 1650 mm corridor width requirement not applicable to small B3 occupancies.	✓		✓		✓			
03-03-21 Clarification that exemption for fire-resistance to walls between patients' or residents' sleeping rooms in B occupancies not to override other Code requirements for a fire separation.								
03-03-22 Deletion of requirement that walls separating corridors					✓			The reference to the 1997 Code restricting the use of alcoves off of the

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
<p>serving patients' or residents' sleeping rooms be constructed as unrated fire separation on basis that the requirement for fire separation of the sleeping rooms themselves will maintain the corridor separation.</p>								<p>corridor for sitting areas etc. is hard to relate to the proposed change.</p>
<p>03-03-23 Editorial change pertaining to allowance for doors in unrated fire separations in B2 occupancy to be equipped with a roller latch.</p>								
<p>03-03-24 Editorial change respecting restriction that certain openings not be installed in unrated fire separations in B occupancies.</p>								
<p>03-03-25 Editorial change to scope description pertaining to Subsection 3.3.4. residential occupancies.</p>					✓			
<p>03-03-26 Proposed transfer of restrictions on sound transmission in residential occupancies to OBC Part 5.</p>						X		<p>Removing restrictions on sound transmission from Part 3 to Part 5 may result in the requirements being "missed" during design as designers refer more intensively to Part 3.</p> <p>If it is felt that the inclusion of such requirements in a Subsection dealing with fire safety and occupancies inappropriate, the requirements could be transferred to Section 3.7. on the basis that they relate to an aspect of health.</p>
<p>03-03-27 Editorial revision to scope sentence pertaining to industrial occupancies.</p>					✓			
<p>03-03-28 Cross-reference in respect of clear height of storage garage to applicable requirements pertaining to barrier-free design.</p>					✓			
<p>03-04-01 New Sentence requiring at least one door at every pedestrian entrance to a building at ground level to be designed in accordance with the requirements for exits.</p>		X		X		X		<p>Is this proposed change prompted by actual significant negative experience, or by mere academic rationalizing?</p> <p>The statement of Problem refers to "swing of exterior doors" while the Cost Implications refers to "appropriate hardware and installation of exit signs".</p> <p>We do believe that there is a problem so severe or pervasive as to warrant this change.</p>

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
03-04-02 Editorial revision to exemption of requirements for access-to-exit for dwelling units conforming to 3.3.4.4. (1) to (4).					✓			
03-04-03 Requirements for mezzanine exiting made significantly more restrictive "in keeping with global changes regarding mezzanines".		X		X		X		<p>The proposed changes will result in vastly more restrictive Code requirements pertaining to mezzanines. It appears the desire for clarity or simplicity in the regulations pertaining to mezzanines has resulted in proposed changes which would significantly erode design freedom and possibilities. What are the issues behind the proposal? "Global changes" does not tell the Code user anything in terms of reasons.</p> <p>The requirement that all four Clauses of Proposed Sentence 3.4.2.2. have to be satisfied is extremely onerous compared to existing circumstances. For instance, there are many mezzanines with an occupant load exceeding 60 persons which are open to the space below and where exits are not required at the level of the mezzanine. Provided there is adequate exit capacity, we see no reason to believe that this situation is unsafe.</p> <p>The only portion of the proposed change which has an apparent positive aspect to it (in terms of design flexibility) is proposed 3.4.2.2.(3) whereby for a mezzanine requiring more than one means of egress, one of the means of egress is permitted to lead through the room (presumably below) in which the mezzanine is located provided other means of egress lead to exits at the mezzanine level. Even this is unnecessarily severe; it appears reasonable that up to half of the means of egress from such mezzanine should be able to lead through the room below.</p> <p>Again, what is the basis in real-life experience in the use of buildings which demonstrates that there is a need to have the Code become so much more restrictive with respect to mezzanine design allowances?</p>
03-04-05 Editorial revisions to requirements for location of exits.								
03-04-06 Relocation of Sentence 3.4.2.5.(3)								
03-04-07 Deletion of allowance for there being not more than two		X		X				

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
exits in a storage garage where persons other than parking attendants are not permitted above the street level.								
03-04-08 Deletion of the word "required" in the context of OBC 3.4.3.1.(1) addressing minimum aggregate width of exits.		X		X		X		The Justification refers to deletion of the word "required" for consistency with other changes. This appears to be the issue, and not merely its application to exit width. Is the philosophy inherent in Appendix Note A-2 Limit on Application being abandoned?
03-04-09 Modification to requirements for exit width. Allowance for 900 mm stairs to serve "not more than three storeys above grade or not more than one storey below grade" modified to indicate they cannot "serve more than two storeys above the lowest exit level or not more than one storey below the lowest exit level". Reference to 790 mm doorway not serving patients' or residents' sleeping rooms changed to 800 mm for doorways not serving patients' sleeping rooms.		X		X		X		<p>The references to "more than two storeys above the lowest exit level" will be more restrictive in some circumstances than the existing Code wording. For instance if an exit door is at a landing between the first storey and basement, the door will serve the first, second and third storeys all of which will be located above the lowest exit level. Alternatively, an exit stair shaft could have two exit levels: one at ground level above a retaining wall, and another at ground level at the base of the retaining wall. It may be appropriate to refer "exit level" instead of "lowest exit level".</p> <p>The Justification for changing the minimum width of a doorway not serving patients' sleeping rooms to 800 mm from 790 mm references a desire for consistency with barrier-free design requirements. It has always been appreciated that the requirements for barrier-free design are separate from the exit width requirements, and that certain exit doors (such as doors to stairs) are not in a barrier-free path of travel. Additionally, as the 1997 OBC requires an 810 mm clear width of doorway for a door in a barrier-free path of travel, would the corresponding Clause 3.4.3.1.(2)(g) in an updated OBC make reference to an 810 mm doorway? This would have the effect of increasing the minimum width of an exit doorway by at least 20 mm. How does Proposed Change No. 03-08-18 whereby the clear width of doorway would be 860 mm relate to the proposal?</p> <p>The reference to barrier-free design also confuses the notion that OBC 3.4.3.1. is dealing with the width of the door, whereas barrier-free design requirements pertain to the clear opening width of a doorway. This should be further reviewed. It has been the industries understanding that the allowance for 790 mm exit doorway was</p>

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
								intended to preserve the traditional minimum 2 ft. 8 in. width of exit door. Otherwise why does the Code refer to "clear width in 3.8. but not in 3.4.?"
03-04-10 Editorial relocation of Sentence 3.4.2.5.(4) to 3.4.3.1.(4)								
03-04-11 Deletion of the word "required" from OBC 3.4.3.2.(1) pertaining to determination of aggregate width of exits.								In this case, deletion of the word "required" appears to be of no consequence. There are other instances, however, where deletion of "required" would be consequential.
03-04-12		X		X		X		See our comments pertaining to Proposed Change 03-02-66
03-04-13 Deletion of the word "required" from description of exit capacity for floor areas serving B occupancies.								Again, deletion of "required" in the context of 3.4.3.4.(2) appears to be innocuous.
03-04-14 Deletion of the word "required" in description of exit capacity for A4 occupancies.								
03-04-15 Allowance that exit doors may diminish required width of exit by 50 mm for each door leaf deleted.		X		X		X		No case is made to the effect that there is any need to eliminate this longstanding Code allowance. The reference to barrier-free requirements is misleading in that it is well understood that clear widths of doorways in a barrier-free path of travel must be maintained as indicated in Section 3.8. It would be more appropriate to cross-reference Section 3.8. as an exception to 3.4.3.5.(2) rather than deleting the existing, long-established allowance.
03-04-16 2050 headroom clearance for stairways above landing or nosing changed to 2100 mm.		X		X		X		The allowance 2050 mm clearance at stairways has been in the Code for decades. The reason provided to justify the change provides no information in terms of statistical analysis of the problem.
03-04-17 Editorial cross-reference to allowable height reduction at doorway due to hardware in sentence describing minimum headroom clearance for doorway.					✓			
03-04-18 Clarification that elevators are permitted to open into a lobby through which an exit leads.					✓			An appropriate clarification of generally accepted practice.
03-04-19 Allowance for exit sign not to be placed over main entrance		X		X		X		The allowance whereby an exit sign need not be installed over a main

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
03-04-27 Requirement that at least one handrail extend horizontally not less than 300 mm beyond the top and bottom of stairway or ramp modified. Proposed allowance whereby handrail extension can turn horizontally at an angle up to 90° in plan from the top or bottom of a ramp or top or bottom nosing of stairs in order to avoid creating a pedestrian hazard or infringing on required width of a passageway. Indication that handrail change in direction cannot occur before handrail extends past top or bottom riser.	✓						~	<p>It is gratifying that there is some recognition that the current interpretation of handrail extension requirements needs modification.</p> <p>We propose that the handrail extension at the bottom of the stair refer to the handrail extending on a slope at least one tread depth beyond the bottom nosing, and no farther. The horizontal extension beyond this point means that a handrail projects 300 mm plus one tread depth in plan beyond the bottom nosing while it projects only 300 mm horizontally beyond the top nosing. The rationale for the greater extension at the bottom of the stair does not appear to justify the disruption such extension causes.</p> <p>This suggestion is implicitly supported by the proposal which would allow the handrail to turn horizontally up to 90° in plan from the “. . . bottom nosing of a flight of stairs . . .”. If handrail can turn horizontally at a point directly above the bottom nosing of a stair (as opposed to turning horizontally one tread depth beyond the bottom of a flight of stairs), why can not the bottom nosing be used as a reference for any handrail extension as opposed to a point where the handrail extends on a slope one tread depth beyond the bottom nosing?</p> <p>Proposed wording for the relevant Sentences in 3.4.6.4. is as follows: (7) Except as provided in Sentence (11), at least one handrail at the side of a stairway or ramp shall extend (a) horizontally not less than 300 mm beyond the top of the stairway or ramp, and (b) on a slope to a point where the handrail is not less than 255 mm beyond the bottom nosing of the flight of stairs or the bottom of the ramp, measured in plan.</p> <p>Sentence (11) would remain as worded in the proposed change.</p> <p>It may be worth clarifying in proposed Sentence (12) that the change in direction of a handrail is in the horizontal plane.</p>
03-04-28 Required minimum clearance between handrail and wall		X						

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
increased to 50 mm from 40 mm based on input from CSA Barrier-Free Design Technical Committee.								
03-04-29 Intermediate handrails required on stairs which incidentally exceed 2200 mm width but which are not required be that wide in consideration of required capacity relative to occupants. Maximum spacing between handrails would not exceed 6 m. There is reference to Appendix A article but no inclusion of same for review.		X		X		X		<p>The indication that a stair exceeding 2200 mm in width needs an intermediate handrail would result in handrails being less than 1100 mm apart. This contrasts with the allowance whereby maximum spacing of handrails can be 6 m. This suggests that the change could indicate merely that handrails should not be more than 6 m apart in any case.</p> <p>There are many instances where stairs are much wider than they need to be relative to assigned capacity. This often occurs at the exterior of buildings and main entrances, or in the interior of a building for visual effect. A more important principle would be to afford persons using the stairs the opportunity to use a handrail in a logical or expected path of travel over the stairs. Rather than mandating specific limits for the placement of such handrails, we believe it would be better to discuss the principle in an appendix note only.</p>
03-04-30								See comments pertaining to Proposed Change No. 03-04-24.
03-04-31 Requirement that minimum height of guards be increased to 1500 mm for exterior stairs and landings located more than 10 m above ground changed so that requirement applies to more than 6 m above ground.		X		X		X		<p>The justification based on structural requirements for wind loading above 6 m bears no rational relationship to the safety of persons on exterior stairs.</p> <p>Are there bases and experience for the change, or is this merely an academic rationalization?</p>
03-04-32 Requirement that leading edge of stair tread have a radius or bevel between 8 mm and 13 mm in horizontal dimension changed to require radius or bevel between 10 mm and 16 mm.								How resilient is resilient?
03-04-33 New allowance whereby if resilient material is used to cover the leading edge of a stair tread, minimum radius can be reduced to 3 mm								
03-04-34 Minimum run of tread in fire escape stair increased to 250 mm from 220 mm.		X		X		X		Fire escape stairs are intended to be used only in emergency where other interior stairs may be blocked. The 220 mm minimum run has

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
03-07-03 If there is only one "universal toilet room" (formerly special washroom) provided, its w.c. may not be considered in determining the number of w.c.'s required unless only a single w.c. is required in the building.		X		X			~	The proposal would be onerous for what has been accepted practice (in some municipalities) whereby the w.c. in a special washroom is apportioned in respect of the w.c. count required of the overall building. We suggest that the allowance for the w.c. in the universal toilet room to be included in the w.c. count required under the Subsection be maintained if not more than two w.c.'s are required for the general population.
03-07-04 Clarification that a single w.c. can serve both sexes where occupant load does not exceed 10 for a number of different occupancies.	✓		✓		✓			
03-07-05 (NBC or OBC) ? table for w.c.'s in an assembly occupancy.								It is not clear if this proposed table is intended to replace OBC Table 3.7.4.3.A or 3.7.4.3.B or another table. The proposed table appears to use an NBC designation.
03-07-06 Transfer of requirement that projections above lavatories be located so as not to present a hazard in 3.8. transferred to 3.7.					✓			
03-07-07 All lavatories to be equipped with faucets that operate automatically or have lever type handles that do not close under spring action.		X		X		X		The numbering system used in the description of the proposed change does not relate well to current OBC numbering. If the proposed change applies to lavatories within individual dwelling units, it is an inappropriate restriction on personal choice.
03-07-08 Revision to requirements for sanitary fixtures in small restaurants.								
03-07-09 New requirements for bathtubs in hotels or motels whereby clear space of 750 mm is required along length of the tub, faucet controls have to conform to restrictions applicable to lavatory faucets, grab bars must be installed and no tracks may be mounted on bathtub rims.		X		X				
03-07-10 New requirement whereby floor surface within 900 mm of a water closet must be resistant to deterioration. Required installation of impervious and durable material.		X						

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
03-08-01 New Sentence requiring a passageway from one building to another to be barrier-free.		X		X		X		<p>The proposed change would have the effect of significantly increasing costs and utilization of space when connecting one building to another – especially when connecting floor levels which are not at the same elevation, or in making connection between buildings where at least one building is an existing building.</p> <p>New buildings are obliged to have minimum requirements for barrier-free accessibility. These requirements provide a standard for such accessibility within the entire building.</p> <p>It is possible to claim that any feature of the built environment which does not accommodate use by persons with disabilities is discriminatory. We do not believe that such claim justifies the proposed change.</p>
03-08-02 Minimum width of barrier-free path of travel to increase to 1100 mm from 1060 mm.								<p>The Justification refers to motorized scooters. However, the proposed change only refers to providing an unobstructed width of 1100 mm for the passage of wheelchairs. If intent is to provide passage for scooters there is an inference of potentially more drastic changes than a 40 mm increase in width for the path of travel.</p>
03-08-03 Editorial revision of description of a barrier-free path of travel.								
03-08-04 Requirement for interior barrier-free path of travel being provided to any storey served by an escalator expanded to storeys served by escalators or inclined moving walks. New requirement for signage for route from escalator or moving walk to a barrier-free path of travel from floor-to-floor.								
03-08-05 Editorial revisions to accessibility of controls.								
03-08-06 Maximum height for building controls in a barrier-free path of travel modified to include minimum height of 900 mm.		X			✓			
03-08-07 Requirement that where an aural signal is used in a security system controlling access to the building, a corresponding visual		X		X				

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
signal must be provided.								
03-08-08 Description of areas requiring barrier-free path of travel to include reference to floor areas served by escalators and inclined moving walks.								This change appears to be unnecessary as there are already requirements for barrier-free path travel to and within storeys served by escalators or inclined moving walks.
03-08-09 10% of all residential suites in an apartment building to have a barrier-free path of travel from the suite entrance door to at least one bedroom and one bathroom.		X		X		X		<p>The proposed change would entail significant cost increases and lessening of the efficiency of space utilization in residential construction. There is no case made in terms of statistics or other detailed data for the proposed change.</p> <p>There is no indication that the suites have to be on a floor area with a barrier-free path of travel prior to requiring the barrier-free path of travel within the suite. There are apartment building designs which extend several storeys above ground level with no elevators. The proposed change should logically exempt such designs.</p> <p>For point-block towers where there is a repeated design from floor-to-floor, the requirement for 10% of suites to be designed with the barrier-free path of travel would be onerous. There may only be a small number of suites per floor.</p>
03-08-10 Indication that requirement for barrier-free path of travel does not apply to floor levels not served by escalators or inclined moving walks.								
03-08-11 Editorial revision to reference to standard applicable to lifts for persons with physical disability.								
03-08-12 Washrooms to be required in individual assembly occupancy suites presently not required to have same under OBC 3.8.2.3.(3). Area of suites of other occupancies not required to have barrier-free washrooms under OBC 3.8.2.3.(3)(c) apparently increased to 500 m ² from 300 m ² .								The proposed change does not address an existing anomaly in OBC 3.8.2.3.(3)(c). This Clause says, in effect, that where there is no possible access to washrooms outside of a suite (via an indoor path of travel) there is no need for a barrier-free washroom in the suite because it has an area not exceeding 300 m ² . By contrast, OBC 9.5.2. appears to require a barrier-free washroom in a detached 100 m ² office building or store.
03-08-13 New requirement indicating that where a building is required								There is a potential for an apartment building to have washrooms and

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
03-08-17 Wall-mounted tactile signs to be installed between 1200 mm and 1500 mm above floor.								
03-08-18 Increase the minimum width of a doorway in a barrier-free path of travel from 810 mm to 860 mm.		X		X		X		<p>This proposed change would, if implemented, have a drastic effect on doors specifying and the layout of floor plans. It appears to take a standard of accessibility based on passage of a wheelchair (which under some codes has been less than 800 mm) to a new standard of relative luxury, or excess.</p> <p>One suspects that it is intended to facility the passage of motorized scooters, devices which we consider to be primarily means of transportation for out of doors. Appendix Note A-3.8.3.3.(1) infers that a door has to be 64 mm wider than the required clear width of doorway for purposes of barrier-free accessibility. On this basis, the door used in a barrier-free path of travel requiring a clear width of 860 mm would have to be $(860 + 64) = 924$ mm wide. This door would be a special, oversized door in terms of building industry conventions and imposition of the requirement would be costly and disruptive.</p> <p>We fail to see how a design standard for an 810 mm clear width of doorway (already a somehow significant 10 mm more than in the NBC) has been adequate for years but now it is not.</p>
03-08-19 Deletion of requirement for maximum 13 mm height for thresholds at doors in recognition that it is covered adequately under descriptions for barrier-free path of travel.					✓			
03-08-20 Requirements for power-door operators at entrances modified so that B3 occupancy buildings not required to have a power-door operator and building area limits for A, D, and E occupancy buildings requiring such operators increase to 500 m ² from 300 m ² . Specific reference to doors on the inner side of a vestibule deleted. Additionally, every door providing barrier-free path of travel through entrances required to be equipped with a power-door operator instead of "the door".								The proposed change appears to be based on considerations related to the NBC. The proposed new content would be less clear than the OBC in terms of requirements for power-door operators on doors on both sides of a vestibule.
03-08-21 Latch side clearances not required on a door in a barrier-free	✓		✓		✓			

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
washroom which is barrier-free accessible.								
03-08-34 Reference to lavatory being built into a counter deleted, on basis that there is no restriction affecting the installation of a lavatory in a counter for barrier-free purposes.					✓			
03-08-35 Relocation of restriction on shelves or projections above lavatories located so as not to present a hazard.								
03-08-36 Revisions to requirements for special washrooms. Named changed to "universal toilet rooms".								
03-08-37 Power-door operator required on special washroom door if door is equipped with a closer.				X				
03-08-38 Proposed allowance that a special washroom may be counted as part of plumbing fixtures required for males of general building population.	✓	X					~	Some municipalities already permit special washrooms to be considered as contributing to the washroom facilities for the general population of a building. The proposed change would take this advantage away with respect to the female population. We do not see the necessity of restricting the proposed ability to count a special washroom as being contributory to the washroom requirements for the general building population to males only.
03-08-39 Requirement for barrier-free shower stalls to apply wherever showers are installed in a building, except within a suite of residential occupancy.		X		X			~	Requirement should only apply in a floor area provided with a barrier-free path of travel.
03-08-40 Barrier-free bathtub requirements described where bathtub is installed in a suite of residential occupancy required to be barrier-free.		X		X				
03-08-41 Vestibule doors in a rapid transit station required to swing in the direction of egress from the station.								
03-15-01 New Section 3.15 Shelf and Rack Storage Systems.							~	The definition of shelf and rack storage system does not specifically indicate that such system is used for storage, other than the use of the adjective in the definition. The modification of decking by the word "roof" appears to be

Change No. & Description	Design Freedom		Cost		Support (✓)	Don't Support (X)	Support with Change (~)	Comment
	More (✓)	Less (X)	Less (✓)	More (X)				
								<p>unnecessary in proposed Sentence 3.15.1.3.(2)</p> <p>The use of the word "permanent" in proposed Article 3.15.1.4. appears unnecessary. Other portions very important components of buildings are not described as "permanent" in the OBC.</p> <p>The requirement for a timed-based egress analysis undertaken and sealed by a professional engineer or architect appears to be unnecessary.</p> <p>Where is the paragraph A5.6 mentioned in proposed Subclause 3.15.1.6.(6)(a)(iii)?</p>