Established in 1889, the Ontario Association of Architects (OAA) is the self-regulating body for the province's architecture profession. It governs the practice of architecture and administers the Architects Act in order to serve and protect the public interest.

James Ross, Manager Building Code Policy Development Unit Ministry of Municipal Affairs and Housing College Park, 16<sup>th</sup> Floor, 777 Bay Street Toronto, Ontario M7A 2J3

December 13, 2021

# Re: Proposed changes for the next edition of Ontario's Building Code (Fall Consultation)

Mr. Ross,

The Ontario Association of Architects (OAA) is closely watching as the harmonization of the Ontario Building Code (OBC) and National Construction Codes (NCC) takes place. While the OAA appreciated the webinars and direct engagement with you, I must tell you our members, including those on our governing Council and on the Sub-Committee on Building Codes and Regulations (SCOBCAR), have found it very challenging to understand why such changes are being made in the absence of clear rationale.

On behalf of the OAA, I encourage the Ministry to always provide rationales to help not only the architecture profession but also the wider design/construction industry navigate these changes and provide meaningful feedback. Without offering clear explanation and intent, the responses from the industry may not be as useful as expected. Once formalized, these changes could ultimately cause confusion in interpretation and application by industry professionals, including Chief Building Officials and Municipal Plans examiners

The OAA appreciated hearing that issues related to energy efficiency and hopefully—climate stability will be dealt with in the winter consultation. I have repeatedly heard feedback from Architects and Licensed Technologists OAA across the province that this seemingly all-encompassing focus on harmonization is a distraction from the most pressing issue before us: the climate emergency.

Based on estimates from various sources, approximately one third of greenhouse gas emissions come form the built environment in which Canadians live, work, and play. As such, the OAA encourages the implementation of energy step codes, both in the OBC and NCC.

Within Ontario, the City of Toronto has already taken a leadership role in this, through the implementation of the Toronto Green Standard (TGS). In this case, all Part 3 buildings must be compliant with Step 1 of the Step Code and project proponents can opt to go beyond Step 1 in exchange for various development incentives. Objective, tiered performance metrics help everyone understand energy use in buildings and can help Ontario achieve its 2030 targets.

I understand that significant changes related to energy efficiency are envisioned to the NCC, which is what made it palatable to include Ontario-specific measures such



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as SB-10 and SB-12 in the scope of the review, whereas other Ontario-specific measures around accessibility were not on the table for harmonization. On behalf of the OAA, I strongly caution that harmonization cannot in any way be allowed to move us backward. The only path is forward, through far more aggressive code changes that get our buildings to net zero in time to achieve the province's 2030 target.

Such measures are incredibly advantageous for not only safeguarding our future, but also future-proofing our economy. Workforce 2030, a coalition of construction-sector employers, educators, and practitioners, estimates that reducing emissions would triple the current number of design and construction professionals working on lowcarbon buildings and retrofits to more than 600,000 workers. Moreover, according to a report prepared for Clean Energy Canada, Canada-wide impacts of the Pan-Canadian Framework's energy efficiency initiatives include a 1% boost in GDP over 14 years, more than 1,650,000 new jobs, more than \$1.4 billion in savings for households across the country, and a reduction of 52 million tonnes of greenhouse gas emissions by 2030.

In Ontario, these initiatives would have the benefit of increasing the province's GDP by \$174.5 billion and create more than 740,000 new jobs between 2017 and 2030.

The OAA would be happy to discuss further its submission with Ministry officials, and we look forward to a winter consultation that focuses adequate attention onto the climate emergency and contains the appropriate rationales to help stakeholders do their work.

Sincerely,

Susan Speigel, Architect OAA, FRAIC President



# TABLE 1: ONTARIO-ONLY BUILDING CODE CHANGES

The table below lists the Building Code change proposals that have been identified as part of major subject areas needed for maintaining and updating Ontario- only Building Code requirements that are

The first three columns of the tables list Ontario's current Building Code requirements, while the fourth column is a "red-lined" version of the proposed changes, comparing the text of the current Ontario

It is important to note that these tables contain only the Sentences that are proposed to be changed, all other Sentences will remain unchanged. Furthermore, only the changes captured in the fifth column will Please provide your comments and feedback in the following link: <u>https://forms.office.com/r/2tgFLg9WFQ</u>

### **Div. A Compliance, Objectives and Functional Statements**

• Part 1 Compliance and General

### **Div. B Acceptable Solution**

- Part 3 Fire Protection, Occupant Safety and Accessibility
- Part 6 Heating, Ventilating and Air-Conditioning
- Part 9 Housing and Small Buildings
- Part 12 Resource Conservation

### **Div. C Administrative Provisions**

Part 1 General

# **Note for MMAH:**

Unless otherwise specified, the proposed codes changes under "Ontario-Only Building Code Changes" were accepted "as-is" or where the OAA had "no comments" were deleted from the list. What remains are the area where OAA had questions or comments.

### **Ontario-Only Code Change Posting**

Current Ontario Current Ontario			Dropood New Optorio Code Provision with the	Branagad New Ontaria Cada Braviaian without
Code Provision		Existing Ontario Code Provision	Proposed New Ontario Code Provision with the Tracked Changes of Code Text	Proposed New Ontario Code Provision without Tracked Changes
Division B / 3.13.2.1.(11) (new)		None – Add new Sentence (11) to 3.13.2.1.	<ul> <li>(11) Elevator shafts that are not within or adjacent to an interconnected floor space are permitted to penetrate the fire separations required in Sentences</li> <li>(2) to (6) provided they are enclosed by,</li> <li>(a) a fire separation having a fireresistance rating not less than 1 h, or</li> <li>(b) wired glass assemblies conforming to MMA Supplementary Standard SB-2, "Fire Performance Ratings".</li> </ul>	<ul> <li>(11) Elevator shafts that are not within or adjacent to an <i>interconnected floor space</i> are permitted to penetrate the <i>fire separations</i> required in Sentences</li> <li>(2) to (6) provided they are enclosed by,</li> <li>(a) a <i>fire separation</i> having a <i>fire- resistance rating</i> not less than 1 h, or</li> <li>(b) wired glass assemblies conforming to MMA Supplementary Standard SB-2, "Fire Performance Ratings".</li> </ul>
Division B / 3.13.3.8. (new)	3.13.3.8. Guards for Rapid Transit Stations	None – Add new Article 3.13.3.8. Guards for Rapid Transit Stations	3.13.3.8. Guards for Rapid Transit Stations (1) <i>Guards</i> are not required at the guideway side of a platform in a <i>rapid transit station</i> .	3.13.3.8. Guards for Rapid Transit Stations (1) <i>Guards</i> are not required at the guideway side of a platform in a <i>rapid transit station</i>
Division B / 3.17.(new)	3.17. (new) Demountable Stages and Demountable Support	None – Add new Subsection 3.17.	3.17. Demountable Stages and Demountable Support Structures 3.17.1. Scope	3.17. Demountable Stages and Demountable Support Structures 3.17.1. Scope

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OAA Comments	Rank	Status
May want to consider using the term "hoistway" and not "shaft" or vice- versa for consistency. consistency with previous clauses	2	I support this proposed change as is with comment(s).
Clarifies that guards are not required at the platform. Not sure what "guideway side" means though? Consider defining "guideway side"	2	I support this proposed change as is with comment(s).
Version of OBC that i have already has a Section 3.17. Additional Requirements for Existing Buildings. Should this be re-numbered to 3.18.? No issue with including a new section for Demountable Stages, etc.	3	I support this proposed change with modification(s).

Current Ontario Code Provision	Current Ontario Code Article Title	Existing Ontario Code Provision	Proposed New Ontario Code Provision with the Tracked Changes of Code Text	Proposed New Ontario Code Provision without Tracked Changes
	(continued)		60 m2 and any part of its platforms is more than 3 m in height above adjacent ground level, (b) the aggregate area of all its platforms is more than 225 m2, or (c) any part of its platforms or any roof, wall or	<ul> <li>3.17.1.1. Application</li> <li>(1) This Section applies to the design, erection, assembly and installation of a <i>demountable stage</i> where,</li> <li>(a) the aggregate area of all its platforms is more than 60 m2 and any part of its platforms is more than 3 m in height above adjacent ground level,</li> <li>(b) the aggregate area of all its platforms is more than 225 m2, or</li> <li>(c) any part of its platforms or any roof, wall or structure attached to or located on any of its platforms is 5 m or more in height above adjacent ground level.</li> <li>(2) This Section applies to the design, erection, assembly and installation of a <i>demountable support structure</i> where,</li> <li>(a) it is more than 3 m in height above adjacent ground level.</li> </ul>
	(continued)		<ul> <li>(b) it is designed to carry a superimposed specified load greater than 115 kg, or</li> <li>(c) it would create a hazard to the public.</li> <li>(3) Except as provided in this Section, demountable stages and demountable support structures are exempt from complying with the requirements of this Division.</li> <li>3.17.2. Construction</li> <li>3.17.2.1. Occupant Load</li> <li>(1) A demountable stage shall be considered a floor area for the purpose of determining the occupant load in accordance with Clause 3.1.17.1.(1)(c).</li> <li>3.17.2.2. Means of Egress</li> <li>(1) A platform of a demountable stage shall be considered a floor area for purposes of this Article.</li> <li>(2) Except as provided in Sentence (3), access to at least two means of egress</li> </ul>	<ul> <li>(b) it is designed to carry a superimposed specified load greater than 115 kg, or</li> <li>(c) it would create a hazard to the public. (3) Except as provided in this Section, <i>demountable stages</i> and <i>demountable support structures</i> are exempt from complying with the requirements of this Division.</li> <li>3.17.2. Construction</li> <li>3.17.2.1. Occupant Load</li> <li>(1) A <i>demountable stage</i> shall be considered a <i>floor area</i> for the purpose of determining the <i>occupant load</i> in accordance with Clause 3.1.17.1.(1)(c).</li> <li>3.17.2.2. Means of Egress</li> <li>(1) A platform of a <i>demountable stage</i> shall be considered a <i>floor area</i> for the purposes of this Article.</li> <li>(2) Except as provided in Sentence (3), access to at least two <i>means of egress</i></li> </ul>

OAA Comments	Rank	Status	

Current Ontario Code Provision	Current Ontario Code Article Title	Existing Ontario Code Provision	Proposed New Ontario Code Provision with the Tracked Changes of Code Text	Proposed New Ontario Code Provision without Tracked Changes
	(continued)		shall be provided from every platform of a demountable stage.         (3) A platform of a demountable stage may be served by one means of egress where.         (a) the total occupant load of the demountable stage is less than 60 persons, and         (b) the aggregate area of the demountable stage is less than 150 m2 or the travel distance from any point on the platform to the exit is less than 30 m.         (4) Except as provided in Sentence (5), where at least two means of egress are required from a platform of a demountable stage, the maximum travel distance to an exit shall be not more than 45 m.         (5) Sentence (4) need not apply where exits are located at not more than 60 m apart, measured along the perimeter of the platform.	<ul> <li>shall be provided from every platform of a <i>demountable stage</i>.</li> <li>(3) A platform of a <i>demountable stage</i> may be served by one <i>means of egress</i> where,</li> <li>(a) the total <i>occupant load</i> of the <i>demountable stage</i> is less than 60 persons, and</li> <li>(b) the aggregate area of the <i>demountable stage</i> is less than 150 m2 or the travel distance from any point on the platform to the <i>exit</i> is less than 30 m.</li> <li>(4) Except as provided in Sentence (5), where at least two <i>means of egress</i> are required from a platform of a <i>demountable stage</i>, the maximum travel distance to an <i>exit</i> shall be not more than 45 m.</li> <li>(5) Sentence (4) need not apply where <i>exits</i> are located at not more than 60 m apart, measured along the perimeter of the platform.</li> </ul>
	(continued)		<ul> <li>(6) The least distance between two required exits on a platform of a demountable stage shall be one-half the maximum diagonal dimension of the platform.</li> <li>(7) Except as provided in Sentence (8) and unless it can be shown that they do not present a hazard, stairs, ramps and handrails in an exit from a platform of a demountable stage shall conform to the dimensional and slip-resistance requirements in Section 3.4.</li> <li>(8) The maximum slope of a fixed ramp serving a platform of a demountable stage shall be 1 in 6. 3.17.2.3. Guards</li> <li>(1) Except as provided in Sentences (2) and (3) and unless it can be shown that the platform does not present a hazard, a guard not less than 1 070 mm high shall be provided for a platform of a demountable stage where the difference in elevation between the platform and the adjacent surface is more than 1 500 mm.</li> </ul>	<ul> <li>(6) The least distance between two required <i>exits</i> on a platform of a <i>demountable stage</i> shall be one-half the maximum diagonal dimension of the platform.</li> <li>(7) Except as provided in Sentence (8) and unless it can be shown that they do not present a hazard, stairs, ramps and handrails in an <i>exit</i> from a platform of a <i>demountable stage</i> shall conform to the dimensional and slip-resistance requirements in Section 3.4.</li> <li>(8) The maximum slope of a fixed ramp serving a platform of a <i>demountable stage</i> shall be 1 in 6. 3.17.2.3. Guards</li> <li>(1) Except as provided in Sentences (2) and (3) and unless it can be shown that the platform does not present a hazard, a <i>guard</i> not less than 1 070 mm high shall be provided for a platform of a <i>demountable stage</i> where the difference in elevation between the platform and the adjacent surface is more than 1 500 mm.</li> </ul>

OAA Comments	Rank	Status	

Current Ontario Code Provision	Current Ontario Code Article Title	Existing Ontario Code Provision	Proposed New Ontario Code Provision with the Tracked Changes of Code Text	Proposed New Ontario Code Provision without Tracked Changes
	(continued)		<ul> <li>(2) Sentence (1) need not apply at the edges of a platform of a demountable stage that face an audience.</li> <li>(3) The height of guards for stairs shall be,</li> <li>(a) not less than 920 mm measured vertically to the top of the guard from a line drawn through the outside edges of the stair nosings, and</li> <li>(b) 1 070 mm around landings.</li> <li>(4) Required guards shall be provided with a top rail and an intermediate rail.</li> <li>(5) The intermediate rail required in Sentence (4) shall be located mid-way between the top rail and the top of the surface being protected or the toe board where provided.</li> <li>3.17.2.4. Clearance to Other Structures</li> <li>(1) Except as provided in Sentence (2), a demountable stage shall not be erected, assembled or installed closer than 3 m to,</li> </ul>	<ul> <li>(2) Sentence (1) need not apply at the edges of a platform of a <i>demountable stage</i> that face an audience.</li> <li>(3) The height of <i>guards</i> for stairs shall be,</li> <li>(a) not less than 920 mm measured vertically to the top of the <i>guard</i> from a line drawn through the outside edges of the stair nosings, and</li> <li>(b) 1 070 mm around landings.</li> <li>(4) Required <i>guards</i> shall be provided with a top rail and an intermediate rail.</li> <li>(5) The intermediate rail required in Sentence (4) shall be located mid-way between the top rail and the top of the surface being protected or the toe board where provided.</li> <li>3.17.2.4. Clearance to Other Structures</li> <li>(1) Except as provided in Sentence (2), a <i>demountable stage</i> shall not be erected, assembled or installed closer than 3 m to,</li> </ul>
	(continued)		<ul> <li>(a) another demountable stage, or</li> <li>(b) another structure, other than a demountable support structure.</li> <li>(2) Sentence (1) need not apply to demountable stages that are located on fair grounds or similar open spaces provided it can be shown that such closer spacing does not create a hazard to the public.</li> <li>3.17.2.5. Flame Resistance</li> <li>(1) Tarpaulins, decorative materials, fabrics and films attached to demountable stages or demountable support structures shall conform to CAN/ULC-S109, "Flame Tests of Flame-Resistant Fabrics and Films" or NFPA 701, "Fire Tests for Flame Propagation of Textiles and Films".</li> <li>3.17.2.6. Provision for Firefighting</li> <li>(1) Access shall be provided to demountable stages for the purpose of firefighting.</li> </ul>	<ul> <li>(a) another demountable stage, or</li> <li>(b) another structure, other than a demountable support structure.</li> <li>(2) Sentence (1) need not apply to <i>demountable stages</i> that are located on fair grounds or similar open spaces provided it can be shown that such closer spacing does not create a hazard to the public.</li> <li>3.17.2.5. Flame Resistance</li> <li>(1) Tarpaulins, decorative materials, fabrics and films attached to <i>demountable stages</i> or <i>demountable support structures</i> shall conform to CAN/ULC-S109, "Flame Tests of Flame- Resistant Fabrics and Films" or NFPA 701, "Fire Tests for Flame Propagation of Textiles and Films".</li> <li>3.17.2.6. Provision for Firefighting</li> <li>(1) Access shall be provided to <i>demountable stages</i> for the purpose of firefighting.</li> </ul>

OAA Comments	Rank	Status	

Current Ontario Code Provision	Current Ontario Code Article Title	Existing Ontario Code Provision	Proposed New Ontario Code Provision with the Tracked Changes of Code Text	Proposed New Ontario Code Provision without Tracked Changes
	(continued)		<ul> <li><u>3.17.2.7. Electrical Systems</u></li> <li>(1) The electrical system and equipment associated with a demountable stage or a demountable support structure, including electrical fuses and switches, shall be inaccessible to the public.</li> <li>(2) Cables on the ground in areas used by the public and adjacent to a demountable stage or demountable support structure shall be placed in trenches or protected by covers to prevent damage from traffic.</li> <li>(3) Where a demountable stage or demountable support structure is to be erected, assembled or installed in proximity to existing above ground electrical conductors, the demountablestage or demountable support structure shall be erected, assembled or installed in accordance with Article 3.1.19.1.</li> <li>3.17.2.8. Structural Provisions</li> <li>(1) Except as provided in Sentences (2) and (4), demountable stages and demountable support structures and their</li> </ul>	<ul> <li>3.17.2.7. Electrical Systems <ul> <li>(1) The electrical system and equipment associated with a <i>demountable stage</i> or a <i>demountable support structure</i>, including electrical fuses and switches, shall be inaccessible to the public.</li> <li>(2) Cables on the ground in areas used by the public and adjacent to a <i>demountable stage</i> or <i>demountable support structure</i> shall be placed in trenches or protected by covers to prevent damage from traffic.</li> <li>(3) Where a <i>demountable stage</i> or <i>demountable support structure</i> is to be erected, assembled or installed in proximity to existing above ground electrical conductors, the <i>demountable stage</i> or <i>demountable support structure</i> shall be erected, assembled or installed in accordance with Article 3.1.19.1.</li> <li>3.17.2.8. Structural Provisions</li> <li>(1) Except as provided in Sentences (2) and (4), <i>demountable stages</i> and <i>demountable support structures</i> and their</li> </ul> </li> </ul>
	(continued)		structural members shall be designed, erected, assembled and installed,         (a) in conformance with Part 4, or         (b) to conform to good engineering practice appropriate to the circumstances such as that described in ANSI E1. 21, "Entertainment Technology - Temporary Structures Used for Technical Production of Out door Enter tainment Events".         (2) The reference velocity pressure shall be the appropriate value determined in conformance with Subsection 1.1.2. based on a probability of being exceeded in any one year of 1-in-10 with a 2.5 gust factor.         (3) For purposes of Clause (1)(a), demountable stages and demountable support structures shall be assigned a Normal Importance Category as described in Table 4.1.2.1.B.         (4) Footing sizes shall be designed in accordance with Clause 9.4.4.1.(1)(b).	structural members shall be designed, erected, assembled and installed, (a) in conformance with Part 4, or (b) to conform to good engineering practice appropriate to the circumstances such as that described in ANSI E1.21, "Entertainment Technology Temporary Structures Used for Technical Production of Outdoor Entertainment Events". (2) The reference velocity pressure shall be the appropriate value determined in conformance with Subsection 1.1.2. based on a probability of being exceeded in any one year of 1-in-10 with a 2.5 gust factor. (3) For purposes of Clause (1)(a), <i>demountable</i> <i>stages</i> and demountable support structures shall be assigned a Normal Importance Category as describe in Table 4.1.2.1.B. (4) Footing sizes shall be designed in accordance with Clause 9.4.4.1.(1)(b).
	(continued)		3.17.2.9. Barrier-Free Design (1) If a demountable stage is intended for limited public occupancy, a barrier-free path of travel conforming to Articles 3.8.1.3. and 3.8.3.4. shall be provided to and throughout at least one platform of the demountable stage.	3.17.2.9. Barrier-Free Design (1) If a <i>demountable stage</i> is intended for limited public occupancy, a <i>barrier- free</i> path of travel conforming to Articles 3.8.1.3. and 3.8.3.4. shall be provided to and throughout at least one platform of the <i>demountable stage</i> .

OAA Comments	Rank	Status	

Current Ontario	Current Ontario		Proposed New Ontario Code Provision with the	Proposed New Ontario Code Provision without
<b>Code Provision</b>	Code Article Title	Existing Ontario Code Provision	Tracked Changes of Code Text	Tracked Changes

OAA Comments	Rank	Status

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#### PROPOSED BUILDING CODE CHANGES EXISTING TECHNICAL VARIATIONS AND ONTARIO -ONLY CHANGES

## TABLE 2: EXISTING TECHNICAL VARIATION CODE CHANGES

The tables below list the Building Code change proposals that have been identified as part of major subject areas that would contribute significantly to increasing harmonization between Ontario's Building The first three columns of the tables list Ontario's current Building Code requirements, while the fourth column is a "red-lined" version of the proposed changes, comparing the text of the current Ontario It is important to note that these tables contain only the Sentences that are proposed to be changed, all other Sentences will remain unchanged. Furthermore, only the changes captured in the fifth column

#### **Div. A Compliance, Objectives and Functional Statements**

- Part 1 Compliance and General
- Part 2 Objectives
- Part 3 Functional Statements
- Div. B Acceptable Solution
- Part 3 Fire Protection, Occupant Safety and Accessibility
- o Secondary Suites
- o Ventilation
- o Standpipe Systems
- o Fire Safety, Fire Sprinklers, Fire Alarm Systems
- i. Provisions Related to Article 3.2.2. Building Size and Construction Relative to Occupancy ii. Other Provisions
- o Guards to Not Facilitate Climbing
- o Mezzanines and Interconnected Floor Spaces
- i. Interconnected Floor Spaces ii. Mezzanines
- Part 4 Structural Design
- Part 5 Environmental Separation
- o Soil Gas and Radon
- o <u>Miscellaneous</u>
- Part 6 Heating, Ventilating and Air-Conditioning
- o Soil gas and Radon
- o Fire sprinklers, fire alarm systems and carbon monoxide alarms
- o Ventilation
- o Miscellaneous
- Part 7 Plumbing
- o Secondary Suites
- o Plumbing
- Part 9 Housing and Small Buildings
- o Soil Gas and Radon
- o Secondary Suites
- o Ventilation
- o Braced-Wall Panels
- o Standpipe Systems
- o Fire Sprinklers, Fire Alarm Systems and Carbon Monoxide Alarms
- o Plumbing
- o Mezzanines
- o Guards to Not Facilitate Climbing

The table below lists the Code change proposals that would fall under Division A of Ontario's Building Code. Making these changes to Ontario's Building Code would better align with the language and

PART 1 COMPLIANCE AND GENERAL

#### OAA Comments Current Current Proposed New Ontario Code **Proposed New Ontario Code** Ontario **Ontario Code** Provision Provision Current Ontario Code Provision Sentence **Code Article** {with the Tracked Changes} {without the Tracked Changes} Title 1.4.1.2. Defined Combustible dusts means dusts and Combustible dusts means dusts and particles that are Since this definition al specific, it is advisable Terms particles that are ignitable and liable to ignitable and liable to produce an explosion. definition is: Combustil produce an explosion. 1.4.1.2.(1) N/A ignitable and liable to not a plural word in the

## **Note for MMAH:**

Unless otherwise specified, the proposed codes changes under "Ontario-Only Building Code Changes" were accepted "as-is" or where the OAA had "no comments" were deleted from the list. What remains

	Rank	Status	
Iready exists in the OFC and is more e to match the OFC definition. The OFC ible dust means dust and particles explode when mixed with air. NOTE: it is the OFC i.e. 'dust' and not 'dusts'.	3	I support this proposed change with modification(s).	

Current /Proposed Ontario Code Sentence	Current Ontario Code Article Title	Current Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Tracked Changes}	Proposed New Ontario Code Provision { <i>without</i> the Tracked Changes}	OAA Comments	Rank Status
<u>3.1.1.1.(2)</u>	3.1.1.1. Application of Functional Statements	N/A	Functional Statement F56 applies only to dwelling units.	Functional Statement F56 applies only to dwelling units.	We do not support this proposed change because it would limit application of F56. We do not understand why to draw attention to it? Can Ministry clarify intent?	4 I do not support this proposed change for the reason(s) stated to the right.
<u>3.1.1.1.(3)</u>	3.1.1.1. Application of Functional Statements	N/A	Functional Statements F73 and F74 do not apply to (a) detached houses, semi-detached houses, houses with a secondary suite, duplexes, triplexes, townhouses, row houses and boarding houses, Secondary Suite), (b) buildings of Group F, Division 1 major occupancy, and (c) buildings that are not intended to be occupied on a daily or full-time basis, including automatic telephone exchanges, pumphouses and substations	<ul> <li>Functional Statements F73 and F74 do not apply to</li> <li>(a) detached houses, semi-detached houses, houses</li> <li>with a secondary suite, duplexes, triplexes,</li> <li>townhouses, row houses and boarding houses,</li> <li>Secondary Suite),</li> <li>(b) buildings of Group F, Division 1 major occupancy,</li> <li>and</li> <li>(c) buildings that are not intended to be occupied on a</li> <li>daily or full-time basis, including automatic telephone</li> <li>exchanges, pumphouses and substations.</li> </ul>	This proposed change is viewed as not necessary and inappropriate because these building types (cited Clauses) are already exempt by Sentence 3.8.1.1.(1) Division B, from having to comply with the requirements of Section 3.8. Barrier-Free Design. This is further reinforced by the fact that there is no objective nor functional statement(s) currently attributed to this acceptable solution (3.8.1.1.(1)) in Table 3.2.1.1., Division A.	4 I do not support this proposed change for the reason(s) stated to the right.
<u>3.1.1.1.(4)</u>	3.1.1.1. Application of Functional Statements	N/A	Functional Statements F90 to F93, F95, F96 and F98 to F100 apply only to (a) buildings of residential occupancy to which Part 9 of Division B applies, (b) buildings containing business and personal services, mercantile or low- hazard industrial occupancies to which Part 9 of Division B applies whose combined total floor area does not exceed 300 m <sub>2</sub> , and (c) buildings containing a mix of the residential and non-residential occupancies described in Clauses (a) and (b).	<ul> <li>Functional Statements F90 to F93, F95, F96 and F98 to F100 apply only to</li> <li>(a) buildings of residential occupancy to which Part 9 of Division B applies,</li> <li>(b) buildings containing business and personal services, mercantile or low- hazard industrial occupancies to which Part 9 of Division B applies whose combined total floor area does not exceed 300 m<sub>2</sub>, and</li> <li>(c) buildings containing a mix of the residential and non-residential occupancies described in Clauses (a) and</li> <li>(b).</li> </ul>	The cited Functional Statements F90 to F93, F95, F96 and F98 to F100 do not currently exist. This beckons the question: are these NEW Functional Statements being proposed? And, what do these statements say? This proposed change is incomplete. MMAH to provide new Statements for review.	4 I do not support this proposed change for the reason(s) stated to the right.

#### PART 3 FUNCTIONAL STATEMENTS

## **DIVISION B ACCEPTABLE SOLUTIONS**

The table below lists the Code change proposals that would fall under Part 3 Fire Protection, Occupant Safety and Accessibility of Ontario's Building Code. Making these changes to Ontario's Building Code would better align with the language and approach of the National Construction Codes and support Ontario's commitment to increase cross-country

For the full list of proposed changes, please view the table below.

Please provide your comments and feedback in the following link: <u>https://forms.office.com/r/2tgFLg9WFQ</u>

V	E	<b>ITI</b>	LA	١T	10	N

Existing Ontario Code Sentence	Existing Ontario Code Article Title	Current Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Tracked Changes}	Proposed New Ontario Code Provision { <i>without</i> the Tracked Changes}	OAA Comments	Rank Status
3.3.5.4.(4)		mechanical ventilation in conformance with the requirements of Subsection 6.2.2. to prevent excessive accumulation of carbon monoxide,	ventilation in conformance with the requirements of Subsection 6.2.2. <u>and Article 6.2.2.5.</u> to prevent	A garage shall be provided with natural or mechanical ventilation in conformance with the requirements of Subsection 6.2.2. and Article 6.2.2.5. to prevent excessive accumulation of carbon monoxide, exhaust fumes or flammable and toxic vapours.	Not sure why it is needed to add sub-articles when 6.2.2. should cover it.	I have reviewed this proposed change and I have no opinion on it.

#### STANDPIPE SYSTEMS

Existing /Proposed Ontario Code Sentence	Existing /Proposed Ontario Code Article Title	Current Ontario Code Provision	Proposed New Ontario Code Provision {with the Tracked Changes}	Proposed New Ontario Code Provision {without the Tracked Changes}	Comments	Rank Status
<u>3.2.5.10.(5)</u>	<del>3.2.9.3.</del> <u>3.2.5.10.</u> Hose Connections	N/A	Hose connections for 64 mm diam hose are note required in a building that is not more than 25 m high, measured between grade and the ceiling level of the top storey and in which an automatic sprinkler system is not installed.	Hose connections for 64 mm diam hose are note required in a building that is not more than 25 m high, measured between grade and the ceiling level of the top storey and in which an automatic sprinkler system is not installed.	"note" should be "not"	2 I support this proposed change as is with comment(s).
<del>3.2.9.1.(1)</del> 3.2.5.8.(1)	3.2.9.1. Where Required 3.2.5.8. Standpipe System	is more than 14 m high measured between grade and the ceiling of the top storey, or (c) is not more than 14 m high measured between grade and the ceiling of the top storey but has a building area exceeding the area shown	<ul> <li>(a) is more than 3 storeys in building height,</li> <li>(b) is more than 14 m high measured between grade and the ceiling of the top storey, or</li> <li>(c) is not more than 14 m high measured between grade de and the ceiling of the top storey but has a building area exceeding the area shown</li> </ul>	(c) not more than 14 m high measured between grade and the ceiling of the top storey but has a building area exceeding the area shown	Table reference should be "Table 3.2.5.8."	3 I support this proposed change with modification(s).
		in Table 3.2.9.1. for the applicable building height if the building is not sprinklered.	in Table 3 <u>3</u> .2. <del>9.1<u>5.8</u>. for the applicable building height if<u>unless</u></del>	in Table <b>3 3.2.5.8.</b> for the applicable building height unless the building is sprinklered throughout.		
<del>3.2.9.2.(1)</del> 3.2.5.9.(1)	<del>3.2.9.2. Standpipe Sy stem Design 3</del> .2.5.9. Standpipe System Design	Except as otherwise provided in this Subsection, if a standpipe system is required, the design, construction, installation and testing of the system shall be in conformance with NFPA 14, "Installation of Standpipe and Hose Systems".	Except as otherwise provided in this Subsection, if a standpipe- system is required, <u>Sentences (2) to (6)</u> , <u>Articles</u> 3.2.5.10. and 3.2.5.11., and <u>Sentence</u> <u>3.2.4.10.(2)</u> , the design, construction, installation and testing of theastandpipe system shall be in- conformance with conform to NFPA 14, "Installation- of Standpipe and Hose Systems".	Except as provided in Sentences (2) to (6), Articles 3.2.5.10. and 3.2.5.11., and Sentence 3.2.4.10.(2), the design, construction, installation and testing of a standpipe system shall conform to NFPA 14, "Installation of Standpipe and Hose Systems."	NBC has 2 additional sentences (2) re dry standpipes being unsatisfactory and (3) water supply need not be more than 30 I/s if more than 1 standpipe is provided. Flow rates are covered in NFPA 14, 7.10 and are consistent with NBC requirement. But the omission of sentences (2) & (3) begs the question, if the principle rational is to harmonize with NBC, why leave out these 2 sentences? I checked he proposed changes to NBC 2020 for changes to 3.2.5.9. and there were none. I suggest we recommend that sentences (2) & (3) be included in OBC revision.	3 I support this proposed change with modification(s).
<u>3.2.5.9.(3.1)</u>	<u>3.2.5.9.</u> <u>Standpipe</u> <u>System Design</u>	N/A	A standpipe need not be installed in a storage garage conforming to Article 3.2.2.83., provided the building is not more than 15 m high.	A standpipe need not be installed in a storage garage conforming to Article 3.2.2.83., provided the building is not more than 15 m high.	I'm not following the proposed numbering. In NBC this is sentence 3.2.5.9.(4)	3 I support this proposed change with modification(s).
<del>3.2.9.2.(4)</del> 3.2.5.9.(4)	3.2.5.9. <u>Standpipe</u> <u>System Design</u> 3.2.9.2. Standpipe Sy stem Design	the hydraulically most remote hose connection of a standpipe system that is required to be installed in a building is permitted to be less than 450 kPa provided that, (a) the building is sprinklered, (b) the water supply at the base of the sprinkler riser is capable of meeting the design flow rate and pressure demand of the sprinkler system, including the inside and outside hose allowance, and (c) fire protection equipment is available to deliver, by means of the fire	the <u>hydraulically</u> <u>most remotetopmost</u> hose connection of a standpipe- system that is required to be installed in a building is permitted to be less than <u>450690</u> kPa provided that, (a) the building is sprinkle red, ( <u>throughout</u> , b) the water supply at the base of the sprinkler riser is capable of meeting, without a fire pump, the design fl ow rate and pressure demand of the sprinkler system, including the inside and outside hose allowance, and (c) fire protection equipment is available to deliver, by	less than 690 kPa provided (a) the building is sprinklered throughout, (b) the water supply at the base of the sprinkler riser is capable of meeting, without a fire pump, the design flow rate and pressure demand of the sprinkler system, including the inside and outside hose allowance, and (c) fire protection equipment is available to deliver, by	Text matches NBC 3.2.5.9.(5). I'm not sure why this sentence is numbered 3.2.5.9.(4).	3 I support this proposed change with modification(s).
			at the <del>hydraulically most remote <u>topmost</u> hose connection of the standpipe</del> -system.			I

### FIRE SAFETY, FIRE SPRINKLERS, FIRE ALARM SYSTEMS

I. PROVISIONS RELATED TO ARTICLE 3.2.2. BUILDING SIZE AND CONST RUCTION RELATIVE TO OCCUPANCY

Existing /Proposed Ontario Code Sentence 3.2.2.18.(1)	Existing /Proposed Ontario Code Article Title 3.2.2.18	2.2. BUILDING SIZE AND CONST RUCTION RELATI	Proposed New Ontario Code Provision {with the Tracked Changes}	Proposed New Ontario Code Provision {without the Tracked Changes}	Comments This language suggestes that sprinklers are required in all buildings regulated by 3.2.2.20 - 3.2.2.83. In the NBC this	Rank     Status       3     I support this proposed change with modification(s).
		conform to the requirements of Articles 3.2.4.8. to 3.2.4.10. and 3.2.5.13.	3.2.2.83., <u>conforming to</u> the system shall conform to the requirements of Articles 3.2.4.8. to 3.2.4.10. and 3.2.5.13. <u>shall be installed</u> throughout a building regulated by one or more of Articles 3.2.2.20. to 3.2.2.83.	sprinkler system conforming to the requirements of Articles 3.2.4.8. to 3.2.4.10. and 3.2.5.13. shall be installed throughout a building regulated by one or more of Articles 3.2.2.20. to 3.2.2.83.	sentence is coordinated with the articles within subsection 3.2.2 where sprinklers are required.Sprinklers are not required in 3.2.2.25, 28, 32, 34, 35, 46, 47, 50, 51, 53, 55, 59, 61, 66, 71, 74, 76, 78, 80, 82 & 83	
<u>3.2.2.18.(2)</u>	3.2.2.18 Automatic Sprinkler System Required	N/A	If a storey in a building or a floor area is required to have an automatic sprinkler system installed throughout in accordance with one or more of Articles 3.2.2.20. to 3.2.2.83. or Section 3.3., the automatic sprinkler system shall also be installed throughout all lower storeys in the building notwithstanding permission in Articles 3.2.2.20. to 3.2.2.83. to construct one or more of those storeys without installing automatic sprinkler protection.	If a storey in a building or a floor area is required to have an automatic sprinkler system installed throughout in accordance with one or more of Articles 3.2.2.20. to 3.2.2.83. or Section 3.3., the automatic sprinkler system shall also be installed throughout all lower storeys in the building notwithstanding permission in Articles 3.2.2.20. to 3.2.2.83. to construct one or more of those storeys without installing automatic sprinkler protection.	Makes sense but caught me, and I assume others off guard. I read this as a requirement and not a permission. How this Sentence is read effects most of Subsection 3.2.2.	2 I support this proposed change as is with comment(s).
3.2.2.20.(2)	3.2.2.20. Group A, Division 1, Any Height, Any Area, Sprinklered	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and, (a) except as permitted by	referred to in Sentence (1) shall be of noncombustible construction, and, (a) except as permitted by	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and (a) except as permitted by	I've made similar comments on the next 69 articles so the following is worthy of some discussion. The OBC revision is all but identical to the NBC. I can't believe that I'm right and the NBC is wrong. I've probably misread Clause (a) but as I read it, 3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. [Superimposed Major Occupancies] By referencing 3.2.2.7., this article permits an unsprinklered superimposed major occupancy even though the A1 occupancy is sprinklered throughout. I.recommend deleting reference to 3.2.2.18	3 I support this proposed change with modification(s).
			SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2), the building shall be sprinklered throughout, (b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h, (c) mezzanines shall have a fire-resistance rating not less than 1 h, and (d) loadbearing walls, columns and arches shall have a fire-resistance rating not less than that required for the supported assembly.	not less than 1 h, and (d) loadbearing walls, columns and arches shall		· · · · · · · · · · · · · · · · · · ·

3.2.2.21.(1)	Storey, Limited Area <u>Sprinklered</u>	is not more than 1 storey in building height, (b) it has less than 40% of the area of the building as 2 storeys for the purpose of, (i) development of productions including preparation of scenery and costumes and rehearsal of performers, (ii) organization of performers, scenery and sound equipment, (iii) preparation by performers for a performance, (iv) managerial functions, or (v) toilets, rest rooms and similar public facilities, (c) it has no occupancy above or below the auditorium other than one that serves it or is dependent on it, (d) it is not more	A building classified as Group A, Division 1 is permitted to conform to Sentence (2) provided, (a) it <u>except as permitted by Sentences 3.2.2.7.(1) and</u> <u>3.2.2.18.(2), the building is sprinklered</u> <u>throughout, (b) it</u> is not more than 1 storey in building height, (b) it is not more than 1 storey in building repearation of productions, including preparation of scenery and costumes and rehearsal of performers for a performance, (iv) managerial functions, or (v) toilets, rest rooms and similar public facilities, (ed) it	it has less than 40% of the area of the building as 2 storeys for the purpose of (i) development of productions, including preparation of scenery and costumes and rehearsal of performers, (ii) organization of performers, scenery and sound equipment, (iii) preparation by performers for a performance, (iv) managerial functions, or (v) toilets, rest rooms and similar public facilities, (d) it	Sprinkler requirement harmonized with NBC. 3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3 I support this proposed change with modification(s).
		than 600 m₂ in building area, and (e) the occupant load is not more than 600.	has no occupancy above or below the auditorium other than one that <u>which</u> serves it or is dependent on it, (d <u>e</u> ) it is not more than 600 m <sub>2</sub> in building area, and ( ef) the occupant load is not more than 600.	has no occupancy above or below the auditorium other than one which serves it or is dependent on it, (e) it is not more than 600 m <sub>2</sub> in building area, and (f) the occupant load is not more than 600.		
3.2.2.22.(1)	Storey Sprinklered	A building classified as Group A, Division 1 is permitted to conform to Sentence (2) provided, (a) it is not more than 1 storey in building height, (b) no part of an auditorium floor is more than 5 m above or below grade, (c) no occupancy is above or below the auditorium other than one that serves it or is dependent on it, and (d) the occupant load of the auditorium floor is not more than 300.	A building classified as Group A, Division 1 is permitted to conform to Sentence ( <u>3.2.2.22.(</u> 2) provided, (a) <u>except as permitted by Sentences</u> <u>3.2.2.7.(1) and 3.2.2.18.(2), the building</u> <u>is sprinklered throughout, (b)</u> it is not more than 1 storey in building height, ( <u>bc</u> ) no part of an auditorium floor is more than 5 m a bove or below grade, ( <u>ed</u> ) no occupancy is above or below the auditorium of ther than one <u>thatwhich</u> serves it or is dependent on it, and ( <u>de</u> ) the occupant load of the auditorium floor i s not more than 300.	dependent on it, and (e) the occupant load of the	Sprinkler requirement harmonized with NBC. 3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me 1.recommend deleting reference to 3.2.2.18	3 I support this proposed change with modification(s).
3.2.2.23.(1)	Division 2, Any Height, Any Area, Sprinklered	be sprinklered, (b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h, (c) mezzanines shall have a fire-resistance rating	referred to in Sentence (1) shall be of noncombustible construction, and, (a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and</u> <u>3.2.2.18.(2)</u> , the building shall be sprinklered <u>throughout</u> , (b) floor assemblies shall be	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building shall be sprinklered throughout, (b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h, (c) mezzanines shall have a fire- resistance rating not less than 1 h, and (d) loadbearing walls, columns and arches shall have a fire- resistance rating not less than that required for the supported assembly.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3 I support this proposed change with modification(s).
3.2.2.24.(1)	3.2.2.24. Group A, Division 2, up to 6 Storeys, Any Area, Sprinklered	to Sentence (2) provided,	A building classified as Group A, Division 2, that is not limited by building area, is permitted to conform to Sentence (2)), provided, (a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2)</u> , the building is sprinklered <u>throughout</u> , and (b) it is not more than 6 storeys in building height.	A building classified as Group A, Division 2, that is not limited by building area, is permitted to conform to Sentence (2), provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, and (b) it is not more than 6 storeys in building height.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3 I support this proposed change with modification(s).

3.2.2.26.(1)	3.2.2.26. Group A, Division 2, up to 2 Storeys, Increased Area <u>, Sprinklered</u>	A building classified as Group A, Division 2 is permitted to conform to Sentence (2) provided, (a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered, (b) it is not more than 2 storeys in building height, and (c) it has a building area not more than, (i) 4 800 m <sub>2</sub> if 1 storey in building height, or (ii) 2 400 m <sub>2</sub> if 2 storeys in building height.	A building classified as Group A, Division 2 is permitted to conform to Sentence (2) provided, (a) except as permitted by <u>SentenceSentences</u> 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered <u>throughout</u> , (b) it is not more than 2 storeys in building height, and (c) it has a building area not more than, (i) 4 800 m <sub>2</sub> if 1 storey in building height, or (ii) 2 400 m <sub>2</sub> if 2 storeys in building height.	A building classified as Group A, Division 2 is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 2 storeys in building height, and (c) it has a building area not more than (i) 4 800 m <sub>2</sub> if 1 storey in building height, or (ii) 2 400 m <sub>2</sub> if 2 storeys in building height.	Sprinkler requirement harmonized with NBC. 3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
3.2.2.27.(1)	3.2.2.27. Group A, Division 2, up to 2 Storeys, Sprinklered	except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered, it is not more than 2 storeys in building height, and it has a building area not more than, 2 400 m <sub>2</sub> if 1	A building classified as Group A, Division 2 is permitted to be of combustible construction or noncombustible construction, used singly or in combination, provided, (a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2)</u> , the building is sprinklered, throughout, (b) it is not more than 2 storeys in building height, and (c) it has a building area not more than, (i) 2 400 m <sub>2</sub> if 1 storey in building height with no basement, (ii) 1 200 m <sub>2</sub> if 1 storey in building height, or (iii) 600 m <sub>2</sub> if 2 storeys in building height.	sprinklered throughout, (b) it is not more than 2 storeys in building height, and (c) it has a building area not more than (i) 2 400 m <sub>2</sub> if 1 storey in building height with no basement, (ii) 1 200 m <sub>2</sub> if 1	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
3.2.2.29.(2)	3.2.2.29. Group A, Division 3, Any Height, Any Area	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and, (a) except as permitted by Sentence 3.2.2.7.(1), the building shall be sprinklered if it is regulated by Subsection 3.2.6., (b) floor assemblies shall be fire separations with a fire- resistance rating not less than 2 h, (c) mezzanines shall have a fire-resistance rating not less than 1 h, (d) if the	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and, (a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and</u> <u>3.2.2.18.(2)</u> , the building shall be sprinklered if it is regulated by <u>Subsection 3.2.6.,throughout</u> , (b) f oor assemblies shall be fire separations with a fire- resistance rating not loss than 2 h, (c) mezzanines sh all have a fire-	building referred to in Sentence (1) shall be of noncombustible construction, and (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building shall be sprinklered throughout, (b) floor assemblies shall be fire separations with a fire-resistance rating not less	Sprinkler requirement harmonized with NBC. 3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me 1.recommend adding "Sprinklered" to article title and deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
		building is not sprinklered, roof assemblies shall have a fire-resistance rating not less than 1 h, and (e) loadbearing walls, columns and arches shall have a fire-resistance rating not less than that required for the supported assembly.	e resistance rating not less than 1 h, (d) if the building is not sprinklered, roof- assemblies shall have a fire resistance rating- not less than 1 h, and (eand (d) loadbearing walls, co lumns and arches shall have a fire resistance- rating not less than that required for the supported- assembly.	columns and arches shall have a fire-resistance rating not less than that required for the supported assembly.			
3.2.2.31.(1)	3.2.2.31. Group A, Division 3, up to 2 Storeys, Sprinklered	A building classified as Group A, Division 3 is permitted to conform to Sentence (2) provided, (a) except as permitted by Sentence 3.2.2.7.(1), the building shall be sprinklered, (b) it is not more than 2 storeys in building height, and (c) it has a building area not more than, (i) 12 000 m <sub>2</sub> if 1 storey in building height, or (ii) 6 000 m <sub>2</sub> if 2 storeys in building height.		and (c) it has a building area not more than (i) 12 i000 m² if 1 storey in building height, or (ii) 6 000 m²	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
3.2.2.33.(1)	3.2.2.33. Group A, Division 3, 1 Storey, Sprinklered	A building classified as Group A, Division 3 is permitted to be of combustible construction or noncombustible construction used singly or in combination, provided, (a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered, (b) it is not more than 1 storey in building height, and (c) it has a building area not more than 7 200 m2.		A building classified as Group A, Division 3 is permitted to be of combustible construction or noncombustible construction used singly or in combination provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 1 storey in building height, and (c) it has a building area not more than 7 200 m2.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).

ement, not a permission and as best as I 7. The language is consistant with NBC e to me I.recommend deleting reference	3	I support this proposed change with modification(s).
ement, not a permission and as best as I 7. The language is consistant with NBC e to me I.recommend deleting reference	3	I support this proposed change with modification(s).

			Sentence <u>Sentences</u> 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered <u>throughout</u> , (b) it is not more than 1 storey in building height, and (c) it has a building area not more than 7 200 m <sub>2</sub> .		
3.2.2.36.(2)	3.2.2.36. Group B, Division 1, Any Height, Any Area, Sprinklered	referred to in Sentence (1) shall be of noncombustible construction, and, (a) except as permitted by Sentence 3.2.2.7.(1), the building shall be sprinklered, (b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h, (c) mezzanines shall have a fire-resistance rating not less 1 h, and (d) loadbearing walls, columns and arches shall have a fire- resistance rating not less than that required for thesupported assembly		Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building shall be sprinklered throughout, (b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h, (c) mezzanines shall have a fire- resistance rating not less than 1 h, and (d) loadbearing walls, columns and arches shall have a fire- resistance rating not less than that required for the supported assembly.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18
3.2.2.37.(1)	3.2.2.37. Group B, Division 1, up to 3 Storeys, Sprinklered	permitted to conform to Sentence (2) provided, (a)	A building classified as Group B, Division 1 is permitted to conform to Sentence (2) provided, (a) except as permitted by <u>SentenceSentences</u>	A building classified as Group B, Division 1 is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18
		than 8 000 m <sub>2</sub> if 3 storeys in building height.	than 1 storey in building height, (ii) not more than 12	3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 3 storeys in building height, and (c) it has a building area (i) that is not limited if the building is not more than 1 storey in building height, (ii) not more than 12 000 m <sub>2</sub> if 2 storeys in building height, or (iii) not more than 8 000 m <sub>2</sub> if 3 storeys in building height.	
3.2.2.38.(2)	3.2.2.38. Group B, Division 2 or Division 3, Any Height, Any	referred to in Sentence (1) shall be of noncombustible construction, and, (a) except as permitted by Sentence 3.2.2.7.(1), the building shall be sprinklered, (b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h, (c) mezzanines shall have a fire-resistance rating not less 1 h, and (d) loadbearing walls, columns and arches shall have a fire- resistance rating not less than that required for the supported assembly		Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building shall be sprinklered throughout, (b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h, (c) mezzanines shall have a fire- resistance rating not less than 1 h, and (d) loadbearing walls, columns and arches shall have a fire- resistance rating not less than that required for the supported assembly.	Add "Area, Sprinklered" to article title. 3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me 1.recommend deleting reference to 3.2.2.18
3.2.2.39.(1)	3.2.2.39. Group B, Division 2 or Division 3, up to 3	Division 3 is permitted to conform to Sentence (2)	A building classified as Group B, Division 2 or Division 3 is permitted to conform to Sentence (2) provided,	A building classified as Group B, Division 2 or Division 3 is permitted to conform to Sentence (2) provided	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.183I support this proposed change with modification(s).
	Storeys, Sprinklered	and (c) it has a building area, (i) that is not limited if the building is not more than 1 storey in building height, (ii) not more than 12 000 m <sub>2</sub> if 2 storeys in building height, or (iii) not more than 8 000 m <sub>2</sub> if 3 storeys in building height.	<ul> <li>(a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2)</u>, the building is sprinklered <u>throughout</u>,</li> <li>(b) it is not more than 3 storeys in building height, and</li> <li>(c) it has a building area,</li> <li>(i) that is not limited if the building is not more than 1 storey in building height,</li> <li>(ii) not more than 12 000 m<sub>2</sub> if 2 storeys in building height, or</li> <li>(iii) not more than 8 000 m<sub>2</sub> if 3 storeys in building height.</li> </ul>	<ul> <li>(a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout,</li> <li>(b) it is not more than 3 storeys in building height, and</li> <li>(c) it has a building area</li> <li>(i) that is not limited if the building is not more than 1 storey in building height,</li> <li>(ii) not more than 12 000 m<sub>2</sub> if 2 storeys in building height, or</li> <li>(iii) not more than 8 000 m<sub>2</sub> if 3 storeys in building height.</li> </ul>	

ement, not a permission and as best as I . The language is consistant with NBC e to me I.recommend deleting reference	3	I support this proposed change with modification(s).
ement, not a permission and as best as I . The language is consistant with NBC e to me I.recommend deleting reference	3	I support this proposed change with modification(s).

3.2.2.40.(1)	3.2.2.40. Group B,	A building classified as Group B, Division 2 or	A building classified as Group B, Division 2 or	A building classified as Group B, Division 2 or	Another diversion from the NBC which has separate
		Division 3 is permitted to conform to Sentence (2) provided, (a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered,	Division 3 is permitted to conform to Sentence (2) provided, (a) except as permitted by SentenceSentences 3.2.2.7.(1) and	Division 3 is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered	Divisions 2 & 3. 3.2.2.18.(2) is a requirement, not a and as best as I can see trumps 3.2.2.7. The langua consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18
		<ul> <li>(b) it is not more than 2 storeys in building height, and</li> <li>(c) it has a building area not more than, (i) 2 400 m<sub>2</sub> if</li> </ul>	<u>3.2.2.18.(2)</u> , the building is sprinklered <u>throughout</u> , (b) it is not more than 2 storeys in building height,	throughout, (b) it is not more than 2 storeys in building height, and	
		1 storey in building height, or (ii) 1 600 m2 if 2 storeys in building height.	<ul> <li>(c) it has a building area not more than,</li> <li>(i) 2 400 m2 if 1 storey in building height, or</li> <li>(ii) 1 600 m2 if 2 storeys in building height.</li> </ul>	<ul> <li>(c) it has a building area not more than</li> <li>(i) 2 400 m2 if 1 storey in building height, or</li> <li>(ii) 1 600 m2 if 2 storeys in building height.</li> </ul>	
3.2.2.41.(1)	3.2.2.41. Group B, Division 2 or Division 3, 1 Storey, Sprinklered	A building classified as Group B, Division 2 or Division 3 is permitted to be of combustible construction or noncombustible construction used	A building classified as Group B, Division 2 or Division 3 is permitted to be of combustible construction or noncombustible construction, used	A building classified as Group B, Division 2 or Division 3 is permitted to be of combustible construction or noncombustible construction, used	Another diversion from the NBC which has separate Divisions 2 & 3. 3.2.2.18.(2) is a requirement, not a and as best as I can see trumps 3.2.2.7. The langua
	eteroy, oprinterou	singly or in combination, provided, except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered, it is not more than 1 storey in building height, and it has a building area not more than 500 m <sub>2</sub> .	singly or in combination, provided, (a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2)</u> , the building is sprinklered, <u>throughout</u> , (b) it is not more than 1 storey in building height, and (c) it has a building area not more than 500 m <sub>2</sub> .	singly or in combination, provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout,	consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18
3.2.2.42.(2)	3.2.2.42. Group C, Any Height, Any Area, Sprinklered	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and,	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and,	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and	3.2.2.18.(2) is a requirement, not a permission and can see trumps 3.2.2.7. The language is consistant but doesn't make sense to me l.recommend deletin to 3.2.2.18
		<ul> <li>(a) except as permitted by Sentence 3.2.2.7.(1), the building shall be sprinklered,</li> <li>(b) except as permitted by Sentence (3), floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h,</li> <li>(c) mezzanines shall have a fire- resistance rating not less than 1 h, and</li> <li>(d) loadbearing walls, columns and arches shall have a fire-resistance rating not less than that required for the supported assembly.</li> </ul>		throughout, (b) except as permitted by Sentence (3), floor assemblies shall be fire separations with a fire- resistance rating not less than 2 h, t (c) mezzanines shall have a fire- resistance rating not less than 1 h, and (d) loadbearing walls, columns and arches shall	
3.2.2.43.(1)			building is sprinklered <u>throughout</u> , (b) it is not more than 6 storeys in building height,	Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1)	3.2.2.18.(2) is a requirement, not a permission and can see trumps 3.2.2.7. The language is consistant but doesn't make sense to me I.recommend deletin to 3.2.2.18
		<ul> <li>(i) that is not limited if the building is not more than 2 storeys in building height,</li> <li>(ii) not more than 12 000 m<sub>2</sub> if 3 storeys in building height,</li> </ul>	and (c) it has a building area, (i) that is not limited if the building is not more than 2 storeys in building height,	(c) it has a building area	
		<ul> <li>(iii) not more than 9 000 m<sub>2</sub> if 4 storeys in building height,</li> <li>(iv) not more than 7 200 m<sub>2</sub> if 5 storeys in building height, or</li> </ul>	(ii) not more than 12 000 m <sub>2</sub> if 3 storeys in building height, (iii) not more than 9 000 m <sub>2</sub> if 4 storeys in building height,	<ul> <li>(ii) not more than 12 000 m<sub>2</sub> if 3 storeys in building height,</li> <li>(iii) not more than 9 000 m<sub>2</sub> if 4 storeys in building height,</li> </ul>	i (
		(v) not more than 6 000 m₂ if 6 storeys in building height.	<ul> <li>(iv) not more than 7 200 m<sub>2</sub> if 5 storeys in building height, or</li> <li>(v) not more than 6 000 m<sub>2</sub> if 6 storeys in building height.</li> </ul>	<ul> <li>(iv) not more than 7 200 m<sub>2</sub> if 5 storeys in building height, or</li> <li>(v) not more than 6 000 m<sub>2</sub> if 6 storeys in building height.</li> </ul>	

the NBC which has separate articles for 18.(2) is a requirement, not a permission be trumps 3.2.2.7. The language is ut doesn't make sense to me reference to 3.2.2.18	3	I support this proposed change with modification(s).
the NBC which has separate articles for 18.(2) is a requirement, not a permission be trumps 3.2.2.7. The language is ut doesn't make sense to me reference to 3.2.2.18	3	I support this proposed change with modification(s).
ement, not a permission and as best as I 7. The language is consistant with NBC e to me I.recommend deleting reference	3	I support this proposed change with modification(s).

ement, not a permission and as best as I 7. The language is consistant with NBC e to me I.recommend deleting reference	3	I support this proposed change with modification(s).
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3.2.2.45.(1)	3.2.2.45. Group C, up to 4 Storeys, Sprinklered	<ul> <li>(2) provided,</li> <li>(a) except as permitted by Sentence</li> <li>3.2.2.7.(1), the building is sprinklered,</li> <li>(b) it is not more than 4 storeys in building height, and</li> <li>(c) it has a building area not more than, (i) 7 200 m<sub>2</sub> if 1 storey in building height, (ii) 3 600 m<sub>2</sub> if 2 storeys in building</li> </ul>	Sentence Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered <u>throughout</u> , (b) it is not more than 4 storeys in building height, and (c) it has a building area not more than, (i) 7 200 m2 if 1 storey in building height, (ii) 3 600 m2 if 2 storeys in building height,	Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 4 storeys in building height, and (c) it has a building area not more than (i) 7 200 m2	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3 I support this proposed change with modification(s).
3.2.2.48.(1)	3.2.2.48. Group C, up to 3 Storeys, Sprinklered	retirement home is permitted to conform to Sentence (2) provided, (a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered, (b) it is not more than 3 storeys in building height, and (c) it has a building area not more than,	A building classified as Group C other than a retirement home is permitted to conform to Sentence (2) provided, (a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and</u> <u>3.2.2.18.(2)</u> , the building is sprinklered <u>throughout</u> , (b) it is not more than 3 storeys in building height, and (c) it has a building area not more than, (i) 5 400 m <sub>2</sub> if 1 storey in building height, (ii) 2 700 m <sub>2</sub> if 2 storeys in building height, or	A building classified as Group C other than a retirement home is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 3 storeys in building height, and (c) it has a building area not more than (i) 5 400 m <sub>2</sub> if 1 storey in building height, (ii) 2 700 m <sub>2</sub> if 2 storeys in building height, or (iii) 1 800 m <sub>2</sub> if 3 storeys in building height.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3 I support this proposed change with modification(s).
3.2.2.49.(2)	3.2.2.49. Group D, Any Height, Any Area	referred to in Sentence (1) shall be of noncombustible construction, and, (a) except as permitted by Sentence 3.2.2.7.(1), the building shall be sprinklered if it is regulated by Subsection 3.2.6.,	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible <u>construction</u> , and <u>construction</u> , and, (a) except as permitted by <u>SentenceSentences</u> 3.2.2.7.(1) and 3.2.2.18.(2), the building shall be	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building shall be sprinklered throughout,	Add ", Sprinklered" to article title. 3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3 I support this proposed change with modification(s).
		fire-resistance rating not less than 2 h, (c) mezzanines shall have a fire- resistance rating not less 1 h, (d) if the building is not sprinklered, roof assemblies shall have a fire-resistance rating not less than 1 h, except that in a building not more than 1 storey in building height this requirement is waived, and (e) loadbearing walls, columns and arches shall have	<ul> <li>(b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h,</li> <li>(c) mezzanines shall have a fire- resistance rating not less than 1 h, and</li> <li>(d) if the building is not sprinklered, roof assemblies shall have a fire-</li> </ul>	have a fire-resistance rating not less than that required for the supported assembly.		
3.2.2.52.(1)	3.2.2.52. Group D, up to 4 Storeys, Sprinklered	<ul> <li>conform to Sentence (2) provided,</li> <li>(a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered,</li> <li>(b) it is not more than 4 storeys in building height, and</li> <li>(c) it has a building area not more than 3 600 m<sub>2</sub>.</li> </ul>	<ul> <li>(a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2)</u>, the building is sprinklered <u>throughout</u>,</li> <li>(b) it is not more than 4 storeys in building height,</li> </ul>	A building classified as Group D is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 4 storeys in building height, and (c) it has a building area not more than 3 600 m <sub>2</sub> .	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3 I support this proposed change with modification(s).

ement, not a permission and as best as I . The language is consistant with NBC e to me I.recommend deleting reference	3	I support this proposed change with modification(s).

3.2.2.54.(1)	Storeys, Sprinklered	<ul> <li>conform to Sentence (2) provided,</li> <li>(a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered,</li> <li>(b) it is not more than 3 storeys in building height, and</li> <li>(c) it has a building area not more than, (i) 14 400 m<sup>2</sup> if 1 storey in building height,</li> <li>(ii) 7 200 m<sup>2</sup> if 2 storeys in building height, or</li> <li>(iii) 4 800 m<sup>2</sup> if 3 storeys in building height.</li> </ul>	<ul> <li>conform to Sentence (2) provided,</li> <li>(a) except as permitted by SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout,</li> <li>(b) it is not more than 3 storeys in building height, and</li> <li>(c) it has a building area not more than, (i) 14 400 m2 if 1 storey in building height,</li> <li>(ii) 7 200 m2 if 2 storeys in building height, or</li> </ul>	A building classified as Group D is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 3 storeys in building height, and (c) it has a building area not more than (i) 14 400 m <sub>2</sub> if 1 storey in building height, (ii) 7 200 m <sub>2</sub> if 2 storeys in building height, (iii) 4 800 m <sub>2</sub> if 3 storeys in building height.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
3.2.2.56.(1)	Storeys, Sprinklered	<ul> <li>(a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered,</li> <li>(b) it is not more than 2 storeys in building height, and</li> <li>(c) it has a building area not more than,</li> <li>(i) 3 000 m2 if 1 storey in building height, or</li> <li>(ii) 2 400 m2 if 2 storeys in building height.</li> </ul>	<ul> <li>(a) except as permitted by SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout,</li> <li>(b) it is not more than 2 storeys in building height, and</li> <li>(c) it has a building area not more than,</li> <li>(i) 3 000 m2 if 1 storey in building height, or</li> </ul>	A building classified as Group D is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 2 storeys in building height, and (c) it has a building area not more than (i) 3 000 m2 if 1 storey in building height, or (ii) 2 400 m2 if 2 storeys in building height.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
3.2.2.57.(2)	Height, Any Area, Sprinklered	noncombustible construction, and, (a) except as permitted by Sentence 3.2.2.7.(1), the building shall be sprinklered, (b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h, (c) mezzanines shall have a fire- resistance rating not less 1 h, and (d) loadbearing walls, columns and arches shall have a fire-resistance rating not less than that required for the supported assembly.	referred to in Sentence (1) shall be of noncombustible <u>construction</u> , <u>and construction</u> , and, (a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2)</u> , the building shall be sprinklered <u>throughout</u> , (b) floor assemblies shall be fire separations with a fire-resistance rating not <u>less thanlessthan 2 h</u> , (c) mezzanines shall have a fire- resistance rating not less <u>than 1</u> h, and	<ul> <li>building referred to in Sentence (1) shall be of noncombustible construction, and</li> <li>(a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building shall be sprinklered throughout,</li> <li>(b) floor assemblies shall be fire separations with a fire-resistance rating not lessthan 2 h,</li> <li>(c) mezzanines shall have a fire- resistance rating not less than 1 h, and</li> <li>(d) loadbearing walls, columns and arches shall</li> </ul>	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
3.2.2.58.(1)	Storeys, Sprinklered	conform to Sentence (2) provided, (a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered, (b) it is not more than 4 storeys in building height, and (c) it has a building area not more than 1 800 m <sub>2</sub> .	conform to Sentence (2) provided, (a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2)</u> , the building is sprinklered <u>throughout</u> , (b) it is not more than 4 storeys in building height, and	A building classified as Group E is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 4 storeys in building height, and (c) it has a building area not more than 1 800 m <sub>2</sub> .	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
3.2.2.60.(1)	Storeys, Sprinklered	<ul> <li>conform to Sentence (2) provided,</li> <li>(a) except as permitted by Sentence</li> <li>3.2.2.7.(1), the building is sprinklered,</li> <li>(b) it is not more than 3 storeys in building height, and</li> <li>(c) it has a building area not more than, (i) 7 200 m<sup>2</sup> if 1 storey in building height,</li> <li>(ii) 3 600 m<sup>2</sup> if 2 storeys in building height, or</li> <li>(iii) 2 400 m<sup>2</sup> if 3 storeys in building height.</li> </ul>	conform to Sentence (2) provided, (a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and</u> <u>3.2.2.18.(2)</u> , the building is sprinklered <u>throughout</u> , (b) it is not more than 3 storeys in building height, and (c) it has a building <u>(area not more than, (i) 7 200 m</u> 2 if <u>1 storey in building height,</u> (ii) 3 600 m <sub>2</sub> if 2 storeys in building height, or	A building classified as Group E is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 3 storeys in building height, and c) it has a building (area not more than (i) 7 200 m <sub>2</sub> if 1 storey in building height, (ii) 3 600 m <sub>2</sub> if 2 storeys in building height, (iii) 2 400 m <sub>2</sub> if 3 storeys in building height.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).

3.2.2.62.(1) 3.2.2.63.(2)	Storeys, Sprinklered 3.2.2.63. Group F,	conform to Sentence (2) provided, (a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered, (b) it is not more than 2 storeys in building height, and (c) it has a building area not more than, (i) 3 000 m <sub>2</sub> if 1 storey in building height, or (ii) 1 800 m <sub>2</sub> if 2 storeys in building height. Except as permitted by Article 3.2.2.16., the building	<ul> <li>conform to Sentence (2) provided,</li> <li>(a) except as permitted by SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout,</li> <li>(b) it is not more than 2 storeys in building height, and</li> <li>(c) it has a building area not more than,</li> <li>(i) 3 000 m<sub>2</sub> if 1 storey in building height, or</li> <li>(ii) 1 800 m<sub>2</sub> if 2 storeys in building height.</li> </ul>	A building classified as Group E is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 2 storeys in building height, and (c) it has a building area not more than (i) 3 000 m <sub>2</sub> if 1 storey in building height, or (ii) 1 800 m <sub>2</sub> if 2 storeys in building height. Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1)	<ul> <li>3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18</li> <li>3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC</li> </ul>	3	I support this proposed change with modification(s).
	Storeys, Sprinklered	noncombustible construction, and, (a) except as permitted by Sentence 3.2.2.7.(1), the building shall be sprinklered,	shall be of noncombustible construction, and,	shall be of noncombustible construction, and (a) except as permitted by Sentences	but doesn't make sense to me I.recommend deleting reference to 3.2.2.18		
		(d) loadbearing walls, columns and arches shall have a fire-resistance rating not less than that required for the supported assembly.	a fire-resistance rating not less than that required for the supported assembly.	have a fire-resistance rating not less than that required for the supported assembly.			
3.2.2.64.(1)	Division 1, up to 3 Storeys, Sprinklered	permitted to conform to Sentence (2) provided, (a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered, (b) it is not more than 3 storeys in building height, and (c) it has a building area not more than, (i) 3 600 m <sub>2</sub> if 1 storey in building height, (ii) 1 800 m <sub>2</sub> if 2 storeys in building height, or (iii) 1 200 m <sub>2</sub> if 3 storeys in building height	<ul> <li>(a) except as permitted by SentenceSentences 3.2.2.7.(11) and 3.2.2.18.(2), the building is sprinklered throughout,</li> <li>(b) it is not more than 3 storeys in building height, and (c) it has a building area not more than, (i) 3 600 m<sub>2</sub> if 1 storey in building height,</li> </ul>	A building classified as Group F, Division 1 is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 3 storeys in building height, and (c) it has a building area not more than (i) 3 600 m <sub>2</sub> if 1 storey in building height, (ii) 1 800 m <sub>2</sub> if 2 storeys in building height, or (iii) 1 200 m <sub>2</sub> if 3 storeys in building height.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
3.2.2.65.(1)	Division 1, up to 2 Storeys, Sprinklered	permitted to conform to Sentence (2) provided, (a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered, (b) it is not more than 2 storeys in building height, and (c) it has a building area not more than, (i) 2 400 m <sub>2</sub> if 1 storey in building height, or	<ul> <li>(a) except as permitted by SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout,</li> <li>(b) it is not more than 2 storeys in building height, and</li> <li>(c) it has a building area not more than,</li> <li>(i) 2 400 m<sub>2</sub> if 1 storey in building height, or</li> </ul>	A building classified as Group F, Division 1 is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 2 storeys in building height, and (c) it has a building area not more than (i) 2 400 m <sub>2</sub> if 1 storey in building height, or (ii) 1 200 m <sub>2</sub> if 2 storeys in building height.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
3.2.2.67.(2)	Division 2, Any Height, Any Area, Sprinklered	noncombustible construction, and, (a) except as permitted by Sentence 3.2.2.7.(1), the building shall be sprinklered, (b) floor assemblies shall be fire separations with a	referred to in Sentence (1) shall be of noncombustible construction, and, (a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and</u> <u>3.2.2.18.(2)</u> , the building shall be sprinklered <u>throughout</u> ,	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building shall be sprinklered throughout, (b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h, (c) mezzanines shall have a fire- resistance rating not less than 1 h, and	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).

		a fire-resistance rating not less than that required for the supported assembly.	(d) loadbearing walls, columns and arches shall have a fire-resistance rating not less than that required for the supported assembly.	have a fire-resistance rating not less than that required for the supported assembly.			
3.2.2.69.(1)	Division 2, up to 4	<ul> <li>(1) A building classified as Group F, Division 2 is permitted to conform to Sentence (2) provided,</li> <li>(a) it is not more than 4 storeys in building height, and</li> <li>(b) it has a building area not more than the value in Table 3.2.2.69.A. or Table 3.2.2.69.B.</li> </ul>	<ul> <li>(1) A building classified as Group F, Division 2 is permitted to conform to Sentence (2) provided,</li> <li>(a) except as permitted by Sentences</li> <li>3.2.2.7.(1) and 3.2.2.18.(2), the building</li> <li>is sprinklered throughout,</li> <li>(b) it is not more than 4 storeys in building height, and</li> <li>(bc) it has a building area not more than the value</li> <li>(i) 18 000 m2 if 1 storey in Table-</li> <li>3.2.2.60.A.building height,</li> <li>(ii) 9 000 m2 if 2 storeys in building height,</li> <li>(iii) 6 000 m2 if 3 storeys in building height,</li> <li>or Table 3.2.2.69.B</li> <li>iv) 4 500 m2 if 4 storeys in building height.</li> </ul>	A building classified as Group F, Division 2 is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 4 storeys in building height, and (c) it has a building area not more than (i) 18 000 m <sub>2</sub> if 1 storey in building height, (ii) 9 000 m <sub>2</sub> if 2 storeys in building height, (iii) 6 000 m <sub>2</sub> if 3 storeys in building height, or iv) 4 500 m <sub>2</sub> if 4 storeys in building height.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
3.2.2.69.(2)	3.2.2.69. Group Group F, Division 2, up to 4 Storeys, Increased Area <u>Sprinklered</u>	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and, (a) floor assemblies shall be fire separations with a fire-resistance rating not less than 1 h, (b) mezzanines shall have a fire- resistance rating not less than 1 h, (c) if the building is not sprinklered, roof assemblies shall have a fire-resistance rating not less than 1 h, and (d) loadbearing walls, columns and arches shall have a fire-resistance rating not less than that required for the supported assembly.	referred to in Sentence (1) shall be of noncombustible construction, and, (a) floor assemblies shall be fire separations with a fire-resistance rating not less than 1 h, (b) mezzanines shall have a fire- resistance rating not less than 1 h, (c) if the building is not sprinklered, roof assemblies s hall have a fire- resistance rating not less than 1 h, and	Except as permitted by Article 3.2.2.16., the building referred to in Sentence (1) shall be of noncombustible construction, and (a) floor assemblies shall be fire separations with a fire-resistance rating not less than 1 h, (b) mezzanines shall have a fire- resistance rating not less than 1 h, and (c) loadbearing walls, columns and arches shall have a fire-resistance rating not less than that required for the supported assembly.		3	I support this proposed change with modification(s).
3.2.2.70.(1)	3.2.2.70. Group F, Division 2, up to 4 Storeys	A building classified as Group F, Division 2 is permitted to conform to Sentence (2) provided, (a) it is not more than 4 storeys in building height, and (b) it has a building area not more than the value in Table 3.2.2.70.A. or Table 3.2.2.70.B.	A building classified as Group F, Division 2 is permitted to conform to Sentence (2) provided, (a) <u>except as permitted by Sentences</u> <u>3.2.2.7.(1) and 3.2.2.18.(2), the building</u> <u>is sprinklered throughout,</u> (b) it is not more than 4 storeys in building height, and (bc) it has a building area not more than the value (i) 9 600 m <sub>2</sub> if 1 storey in Table- <u>3.2.2.70.A.building height,</u> (ii) 4 800 m <sub>2</sub> if 2 storeys in building height, (iii) 3 200 m <sub>2</sub> if 3 storeys in building height, (iii) 2 400 m <sub>2</sub> if 4 storeys in building height.	A building classified as Group F, Division 2 is permitted to conform to Sentence (2) provided, (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 4 storeys in building height, and (c) it has a building area not more than (i) 9 600 m <sup>2</sup> if 1 storey in building height, (ii) 4 800 m <sup>2</sup> if 2 storeys in building height, (iii) 3 200 m <sup>2</sup> if 3 storeys in building height, or (iv) 2 400 m <sup>2</sup> if 4 storeys in building height.	Add ", Sprinklered" to article title. 3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
<u>3.2.2.70A.(1)</u>	3.2.2.70.(1) Group F. Division 2, up to <u>3 Storeys</u>	N/A	A building classified as Group F, Division 2 is permitted to conform to Sentence (2) provided (a) it is not more than 3 storeys in building height, and (b) it has a building area not more than the value in Table 3.2.2.76.	A building classified as Group F, Division 2 is permitted to conform to Sentence (2) provided (a) it is not more than 3 storeys in building height, and (b) it has a building area not more than the value in Table 3.2.2.76.	Renumbering, should table reference be "Table 3.2.2.70A"	3	I support this proposed change with modification(s).

3.2.2.73.(2)	3.2.2.73. Group F, Division 3, Any Height, Any Area <u>Sprinklered</u>	referred to in Sentence (1) shall be of noncombustible construction, and, (a) except as permitted by Sentence 3.2.2.7.(1), the building shall be sprinklered if it is regulated by Subsection 3.2.6., (b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h, except that floor assemblies are permitted to be fire separations with a fire-resistance rating not less than 1 h in a storage garage with all storeys constructed as open- air storeys, (c) mezzanines shall have a fire-resistance rating not less 1 h,	noncombustible construction, and, (a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and</u> <u>3.2.2.18.(2)</u> , the building shall be sprinklered if it is regulated by Subsection <u>3.2.6.,throughout,</u> (b) floor assemblies shall be fire separations with a fire-resistance rating not less than 2 h, except that floor assemblies are permitted to be fire separations with a fire-resistance rating not less than 1 h in a storage garage with all storeys constructed as open- air storeys, (c) mezzanines shall have a fire- resistance rating not less <u>than 1 h, and</u> (d) if the building is not sprinklered, roof assemblies shall have a fire-	(d) loadbearing walls, columns and arches shall	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me 1.recommend deleting reference to 3.2.2.18	I support this proposed change with modification(s).
			(e(d) loadbearing walls, columns and arches shall ha ve a fire- resistance rating not less than that required for the su pported assembly.		L L	
3.2.2.74.(1)	3.2.2.75. Group F, Division 3, up to 6 Storeys, Sprinklered	A building classified as Group F, Division 3 is permitted to conform to Sentence (2) provided, (a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered, (b) it is not more than 6 storeys in building height, and (c) it has a building area, (i) that is not limited if the building is not more than 1 storey in building height, (ii) not more than 21 600 m <sub>2</sub> if 2 storeys in building height, (iii) not more than 14 400 m <sub>2</sub> if 3 storeys in building height, (iv) not more than 10 800 m <sub>2</sub> if 4 storeys in building height, (v) not more than 8 640 m <sub>2</sub> if 5 storeys in building height, or (vi) not more than 7 200 m <sub>2</sub> if 6 storeys in building height.	<ul> <li>(a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2)</u>, the building is sprinklered <u>throughout</u>,</li> <li>(b) it is not more than 6 storeys in building height, and</li> <li>(c) it has a building area,</li> <li>(i) that is not limited if the building is not more than 1 storey in building height,</li> <li>(ii) not more than 21 600 m<sub>2</sub> if 2 storeys in building height,</li> <li>(iii) not more than 14 400 m<sub>2</sub> if 3 storeys in building height,</li> <li>(iv) not more than 10 800 m<sub>2</sub> if 4 storeys in building height,</li> <li>(v) not more than 8 640 m<sub>2</sub> if 5 storeys in building</li> </ul>	A building classified as Group F, Division 3 is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 6 storeys in building height, and (c) it has a building area (i) that is not limited if the building is not more than 1 storey in building height, (ii) not more than 21 600 m <sub>2</sub> if 2 storeys in building height, (iii) not more than 14 400 m <sub>2</sub> if 3 storeys in building height, (iv) not more than 10 800 m <sub>2</sub> if 4 storeys in building height, (v) not more than 8 640 m <sub>2</sub> if 5 storeys in building height, or (vi) not more than 7 200 m <sub>2</sub> if 6 storeys in building height.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me 1.recommend deleting reference to 3.2.2.18	I support this proposed change with modification(s).
3.2.2.77.(1)	3.2.2.77. Group F, Division 3, up to 4 Storeys, Sprinklered	A building classified as Group F, Division 3 is permitted to conform to Sentence (2) provided, (a) except as permitted by Sentence 3.2.2.7.(1), the building is sprinklered, (b) it is not more than 4 storeys in building height, and (c) it has a building area not more than, (i) 14 400 m <sub>2</sub> if 1 storey in building height, (ii) 7 200 m <sub>2</sub> if 2 storeys in building height, (iii) 4 800 m <sub>2</sub> if 3 storeys in building height, or (iv) 3 600 m <sub>2</sub> if 4 storeys in building height.	<ul> <li>(a) except as permitted by <u>SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2)</u>, the building is sprinklered <u>throughout</u>,</li> <li>(b) it is not more than 4 storeys in building height,</li> </ul>	A building classified as Group F, Division 3 is permitted to conform to Sentence (2) provided (a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout, (b) it is not more than 4 storeys in building height, and (c) it has a building area not more than (i) 14 400 m <sub>2</sub> if 1 storey in building height, (ii) 7 200 m <sub>2</sub> if 2 storeys in building height, (iii) 4 800 m <sub>2</sub> if 3 storeys in building height, (iv) 3 600 m <sub>2</sub> if 4 storeys in building height.	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	I support this proposed change with modification(s).

3.2.2.79.(1)	3.2.2.79. Group F, Division 3, up to 2 Storeys, Sprinklered		<ul> <li>(1) A building classified as Group F, Division 3 is p mitted to conform to Sentence (2) provided,</li> <li>(a) except as permitted by SentenceSentences 3.2.2.7.(11) and</li> </ul>	A building classified as Group F, Division 3 is permitted to conform to Sentence (2) provided	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
		(b) it is not more than 2 storeys in building height, and (c) it has a building area not more than, (i) 7 200 i 1 storey in building height, or (ii) 2 400 m <sub>2</sub> if 2 storeys in building height.	(b) it is not more than 2 storeys in building height, m₂ if and	<ul> <li>(a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout,</li> <li>2 if (b) it is not more than 2 storeys in building height, and</li> <li>(c) it has a building area not more than</li> <li>(i) 7 200 m<sub>2</sub> if 1 storey in building height, or</li> <li>(ii) 2 400 m<sub>2</sub> if 2 storeys in building height.</li> </ul>			·
3.2.2.81.(1)	3.2.2.81. Group F, Division 3, 1 Storey, Sprinklered	A building classified as Group F, Division 3 is permitted to be of heavy timber construction or noncombustible construction used singly or in combination provided, (a) except as permitted by Sentence 3.2.2.7.(1), t building is sprinklered, (b) it is not more than 1 storey in building height, (c) it has a building area not more than 16 800 ma	SentenceSentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout,	<ul> <li>A building classified as Group F, Division 3 is permitted to be of heavy timber construction or noncombustible construction used singly or in combination provided</li> <li>(a) except as permitted by Sentences 3.2.2.7.(1) and 3.2.2.18.(2), the building is sprinklered throughout,</li> <li>(b) it is not more than 1 storey in building height, and</li> <li>(c) it has a building area not more than 16 800 m<sub>2</sub>.</li> </ul>	3.2.2.18.(2) is a requirement, not a permission and as best as I can see trumps 3.2.2.7. The language is consistant with NBC but doesn't make sense to me I.recommend deleting reference to 3.2.2.18	3	I support this proposed change with modification(s).
II. OTHER PROV Existing /Proposed Ontario Code Sentence	Existing /Proposed	Current Ontario Code Provision	Proposed New Ontario Code Provision {with the Tracked Changes}	Proposed New Ontario Code Provision {without the Tracked Changes}	Comments	Rank	Status
3.1.15.2.(2)	3.1.15.2. Roof Coverings	or C classification for, a tent, an air-supported structure, a building of Group A, Division 2 occupancy not more than 2 storeys in building height and not more than 1 000 m <sub>2</sub> in building area, provided the roof covering is underlaid with noncombustible material, or a steel building system described in Article 4.3.4.3., provided the roof covering consists of metal	or C classification for, a tent, an air-supported structure, a building of Group A, Division 2 occupancy b not more than 2 storeys in building height and not more than 1 <u>?</u> 000 m <sub>2</sub> in building area, provided the roof covering is underlaid with noncombustible material, or a steel building system describedreferred to in Article 4.3.4.3., provided the t	A roof covering is not required to have a Class A, B or C classification for a tent, an air-supported structure, a building of Group A, Division 2 occupancy not more han 2 storeys in building height and not more than 1?000 m <sub>2</sub> in building area provided the roof covering is underlaid with noncombustible material, or a steel building system referred to in Article 4.3.4.3., provided he roof covering consists of brick, masonry, concrete, netal sheets or metal shingles.	Added more roof coverings (brick? masonry? etc.). But why remove the "or other noncombustible roofing materials". I suggest leaving that in. Taking it out removes opportunity to innovation for roof materials.	3	I support this proposed change with modification(s).
	3.2.3.7. Construction	Articles 3.2.3.10. and 3.2.3.11, the fire-resistance rating, construction and cladding for exposing building faces of buildings or fire compartments shall	(6 <u>4) and Articles 3.2.3.10. and 3.2.3.11, the fire-</u> resistance rating, construction and cladding for exposing building faces of buildings or fire	Except as provided by Sentences (3) to (4) and Articles 8.2.3.10. and 3.2.3.11, the fire-resistance rating, construction and cladding for exposing building faces of buildings or fire compartments of Group A, B, C, D or Group F, Division 3 occupancy classification shall comply with Table 3.2.3.7.	Ok with the change. But Sentence (1) and (2) have inconsistent wording. "provided by" versus "provided in" "(3) to (4)" versus "(3) and (4)".	2	I support this proposed change as is with comment(s).
3.2.3.7.(2)	3.2.3.7. Construction of Exposing Building Face	Reserved	and (4) and Article 3.2.3.10., the fire- resistance rating, construction and cladding for exposing building faces of buildings or fire compartments of Group E or Group F, Division 1 or 2 of	Except as provided in Sentences (3) and (4) and Article 8.2.3.10., the fire- resistance rating, construction and cladding for exposing building faces of buildings or fire compartments of Group E or Group F, Division 1 or 2 becupancy classification shall comply with Table 8.2.3.7.	Ok with the change. But Sentence (1) and (2) have inconsistent wording. "provided by" versus "provided in" "(3) to (4)" versus "(3) and (4)".	2	I support this proposed change as is with comment(s).

3.2.4.3.(1)	3.2.4.3. Types of Fire Alarm Systems	stage system in a Group B occupancy other than those described in Clause (c), (c) a single or two stage system in a building 3 storeys or less in	system in a Group F, Division 1 occupancy, (b) a two except as permitted in Clause C), a 2-stage system in a Group B occupancy other than those described in Clause (c),, (c) a single- or two 2_stage system in a <u>Group B, Division 3 occupancy where the building is</u> 3 storeys or less in building height that contains a Gro	<ul> <li>(b) except as permitted in Clause C), a 2-stage system in a Group B occupancy,</li> <li>(c) a single- or 2-stage system in a Group B, Division 3 occupancy where the building is 3 storeys or less in building height,</li> <li>(d) a single stage system in elementary and secondary schools, except for a special needs facility, and</li> </ul>	except adds clause for sepcial needs facility. Is this defined?	2	I support this proposed change as is with comment(s).
<u>3.2.4.15.(3)</u>	3.2.4.17. System Monitoring	N/A		The actuation of each waterflow detecting device required by Sentence (1) shall be indicated separately on the fire alarm system annunciator.	sentence in column A should be 3.2.4.17 (3)	2	I support this proposed change as is with comment(s).
3.2.5.7.(2)	3.2.5.7. Water Supply	Hydrants shall be located within 90 m horizontally of any portion of a building perimeter that is required to face a street in Subsection 3.2.2.	Hydrants shall be located within 90 m horizontally of a ny portion of a building perimeter that is required to fa ce a street in Subsection 3.2.2.	N/A	<ul> <li>We require additional context of this change.</li> <li>Additional comment: It makes sense to delete this sentence from the Article that regulates Water Supply. The provisions for location of fire hydrant seems sufficient under current location, 3.2.5.5.(2)(b)</li> <li>for a building not provided with a fire department connection, a fire department pumper vehicle can be located so that the length of the access route from a hydrant to the vehicle plus the unobstructed path of travel for the firefighter from the vehicle to the building is not more than 90 m.</li> <li>(4) If a portion of a building is completely cut off from the remainder of the building, the access routes required by Sentence (2) shall be located so that the unobstructed path of travel for one entrance of each portion of the building is not more than 45 m.</li> </ul>	4	I do not support this proposed change for the reason(s) stated to the right.
3.2.5.16.(3)	3.2.5.16. Fire Department Connections	The fire department connections required in Sentences (1) and (2) shall be, located on the outside of a building adjacent to a street or an access route, not less than 300 mm and not more than 900 mm above ground level, and provided with two 65 mm hose connections with female swivel hose couplings.	The fire department connections required in Sentenc es (1) and (2) shall be, located on the outside of a bui lding adjacent to a street or an access route, not less- than 300 mm and not more than 900 mm above ground level, and provided with two 6 5 mm hose connections with female swivel hose coup lings.	N/A	unclear on reason for deletion - need more background	2	I support this proposed change as is with comment(s).
3.2.7.9.(4)	3.2.7.9. Emergency Power for Building Services	Except as provided by Sentence (5), an emergency power supply capable of operating under a full load for not less than 30 min shall be provided by emergency generator for water supply for firefighting in conformance with Article 3.2.5.7., if the supply is dependent on electrical power supplied to the <i>building</i> , and the <i>building</i> is not within the scope of Subsection 3.2.6.	Except as provided by Sentence (5), an emergency p ower supply capable of operating under a full load for- not less than 30 min shall be provided by emergency- generator for water supply for firefighting in conforma nce with Article 3.2.5.7., if the supply is dependent on electrical power supplied to the <i>building</i> , and the <i>buil</i> <i>ding</i> is not within the scope of Subsection 3.2.6.		If intent is to align with NBC, clause 1(b) in same article 3.2.7.9 needs to be modified to delete high building requirement. Sentence (4) is specific to requirements for buildings not within High Buildings: (b) water supply for firefighting in conformance with Article 3.2.5.7., if the supply is dependent on electrical power supplied to the building, and the building is within the scope of Subsection 3.2.6.,	3	I support this proposed change with modification(s).

		(6) Sentence (1) does not apply at the front edges of	(6) Sentence (1) does not apply at	(6) Sentence (1) does not apply,	Appears the intent is to govern floor pits, but the reading seems	4 I do not support this proposed
3.3.1.17.(6)	3.3.1.17. Guards	stages, floor pits in repair garages and loading docks.	(a) to the front edges of stages, floor pits in repair garages and (b) to loading docks, (c) to floor pits in repair garages, or (c) where access is provided for maintenance purposes only.	<ul> <li>(a) to the front edges of stages,</li> <li>(b) to loading docks,</li> <li>(c) to floor pits in repair garages, or</li> <li>(d) where access is provided for maintenance purposes only.</li> </ul>	<ul> <li>to apply also to raised maintenance platforms which would create unsafe conditions and would be contradictory to the requirement for guards elsewhere. This should be clarified.</li> <li>Replaces floor pits with general maintenance purposes. But couldn't that mean areas for building maintenance that are elevated? This would allow maintenance platform within building to not require guards. It is an unsafe situation.</li> <li>Additional comments:</li> <li>platforms (no matter how high) are covered under Article 3.4.7.6. Guards and Railings, Sentence (1):</li> <li>(1) The open sides of every platform, balcony and stairway forming part of a fire escape shall be protected by guards not less than 920 mm high measured vertically above the nosing of any tread or platform.</li> <li>The NBCC intent behind this sentences offers a rational which in my opinion makes sense:</li> <li>Intent 1:</li> <li>To exempt the front edges of stages, loading docks and access for maintenance purposes only from the requirements for guards stated in Sentence 3.3.1.18.(1), on the basis that the users are familiar with the hazard and that the function of the stage, loading dock or access would be negatively impacted by a guard.</li> <li>A real-life example, Inn on the Park - Toyota does not have any guard protection at the perimeter of the pit.</li> </ul>	change for the reason(s) stated to the right.
3.3.2.12.(4)	3.3.2.12. Stages for Theatrical Performances	A fire curtain required by Sentence (3) shall be of a type designed to close, (a) automatically upon the actuation of the sprinkler system, (b) automatically upon actuation of the fire alarm system, (c) manually by remote control devices located at the curtain control panel and at each side of the stage, and (d) automatically by heat-actuated devices.	A fire curtain required by Sentence (3) shall be of a type <u>acceptable to the authority</u> <u>having jurisdiction and</u> designed to close, (a) automatically upon the actuation of the sprinkler system, (b) automatically upon actuation of the fire alarm system, <u>and (c)</u> manually by remote control devices located at the curtain control panel and at each side of the stage, <u>and (d) automatically by heat-actuated devices.</u>	A fire curtain required by Sentence (3) shall be of a type acceptable to the authority having jurisdiction and designed to close (a) automatically upon the actuation of the sprinkler system, (b) automatically upon actuation of the fire alarm system, and (c) manually by remote control devices located at the curtain control panel and at each side of the stage.	Why do we need to add "acceptable to the AHJ" here??	4 I do not support this proposed change for the reason(s) stated to the right.
GUARDS TO I	NOT FACILITATE	CLIMBING				
Existing /Proposed Ontario Code Sentence	Existing /Proposed Ontario Code Article Title	Current Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Tracked Changes}	Proposed New Ontario Code Provision { <i>without</i> the Tracked Changes}	Comments	#N/A
3.3.1.17.(5)	3.3.1.17. Guards	Unless it can be shown that the location and size of openings do not present a hazard, a guard shall be designed so that no member, attachment or opening located between 140 mm and 900 mm above the level protected by the guard will facilitate climbing.	penings do not present a hazard, a guard <u>Except for g</u> uards conforming to Article 3.3.5.9., guards that prote ct a level located more than one storey or 4.2 m abov		Not sure where 4.2 m came from.	2 I support this proposed change as is with comment(s).
3.4.6.6.(8)	3.4.6.6. Guards	Unless it can be shown that the location and size of openings do not present a hazard, a guard shall be designed so that no member, attachment or opening located between 140 mm and 900 mm above the level being protected by the guard will facilitate climbing.	penings do not present a hazard, a guard <u>Except for g</u> uards conforming to Article 3.3.5.9., guards that prote ct a level located more than one storey or 4.2 m abov	Except for guards conforming to Article 3.3.5.9., guards that protect a level located more than one storey or 4.2 m above the adjacent level shall be designed so that no member, attachment or opening located between 140 mm and 900 mm above the level being protected by the guard facilitates climbing.	Not sure where 4.2 m came from.	2 I support this proposed change as is with comment(s).

# MEZZANINES AND INTERCONNECTED FLOOR SPACES

	CTED FLOOR SPACE	S		1		
Existing /Proposed Ontario Code Sentence	Existing /Proposed Ontario Code Article Title	Current Ontario Code Provision	Proposed New Ontario Code Provision {with the Tracked Changes}	Proposed New Ontario Code Provision {without the Tracked Changes}	Comments	Rank Status
3.2.8.2.(5)	3.2.8.2. Exceptions to Special Protection	not conform to the requirements in Articles 3.2.8.3. to 3.2.8.11. provided, (a) the opening for each stairway, escalator or walk	<ul> <li>Except as permitted by Sentence (6), openings for d stairways, escalators and inclined moving walks need not conform to the requirements in Articles 3.2.8.3. to 3.2.8.118. provided,</li> <li>(a) the opening for each-stairway, escalator or walk does not exceed 10 m<sub>2</sub>,</li> <li>(b) the building is sprinklered throughout, and</li> <li>(c) the interconnected floor space contains only Group A, Division 1, 2 or 3, Group D or Group E major occupancies.</li> </ul>	<ul> <li>Except as permitted by Sentence (6), openings for</li> <li>escalators and inclined moving walks need not conform</li> <li>to the requirements in Articles 3.2.8.3. to 3.2.8.8.</li> <li>provided</li> <li>(a) the opening for each escalator or walk does not</li> <li>exceed 10 m<sub>2</sub>,</li> <li>(b) the building is sprinklered throughout, and</li> <li>(c) the interconnected floor space contains only Group</li> <li>A, Division 1, 2 or 3, Group D or Group E major</li> <li>occupancies.</li> </ul>	Exeption for openings for stairways should remain.	4 I do not support this proposed change for the reason(s) stated to the right.
3.2.8.2.(6)	3.2.8.2. Exceptions to Special Protection	An interconnected floor space need not conform to the requirements of Articles 3.2.8.3. to 3.2.8.11. provided, (a) the interconnected floor space consists of the firs storey and the storey next above or below it, but not both, (b) the interconnected floor space is sprinklered, and (c) the interconnected floor space contains only Group A, Division 1, 2 or	<u>it consists of the first storey and the storey next abov</u> e or below it, but not both,	throughout or, where the building area is not more than one half of the area permitted by Subsection 3.2.2., the	This does not read the same as the NBC. The NBC reads as follows a) it consists of, but not both, b) it is sprinklered throughout or, where then c) - there is a typo whereby ",b)" is missing from the text.	3 I support this proposed change with modification(s).
		3, Group D, Group E, or Group F, Division 2 or 3 occupancies.	are used only for stairways, escalators or moving walks, and (c) the interconnected floor space <u>it</u> contains only Gro up A, Division 1, 2 or 3, Group D, Group E, or Group F, Division 2 or 3 <u>major</u> occupancies.			
3.2.8.3.(1)	3.2.8.3. Sprinklers	N/A	A building containing an interconnected floor space shall be sprinklered throughout.	A building containing an interconnected floor space shall be sprinklered throughout.	This new requirement does particularly tighten the requirements around retrofits where before one could just sprinkler the interconnected space in some instances as the wording was "it is sprinklered throughout" it being what exactly? - Now matches the NBC	2 I support this proposed change as is with comment(s).
3.2.8.4.(1)	3.2.8.4. Vestibules	N/A	An exit opening into an interconnected floor space shall be protected at each opening into the interconnected floor space by a vestibule (a) with doorways that are not less than 1.8 m apart, (b) that is separated from the remainder of the floor area by a fire separation that is not required to have a fire-resistance rating, and	An exit opening into an interconnected floor space shall be protected at each opening into the interconnected floor space by a vestibule (a) with doorways that are not less than 1.8 m apart, (b) that is separated from the remainder of the floor area by a fire separation that is not required to have a fire-resistance rating, and	Need similar explanatory clause to what is in NBC	2 I support this proposed change as is with comment(s).
			(c) that is designed to limit the passage of smoke so that the exit stair shaft does not contain more than 1% by volume of contaminated air from the fire floor, assuming an outdoor temperature equal to the January design temperature on a 2.5% basis determined in accordance with Subsection 1.1.2.	(c) that is designed to limit the passage of smoke so that the exit stair shaft does not contain more than 1% by volume of contaminated air from the fire floor, assuming an outdoor temperature equal to the January design temperature on a 2.5% basis determined in accordance with Subsection 1.1.2.		1 1

3.2.8.6.(1)	3.2.8.6. Draft Stops	N/A		A draft stop shall be provided at each floor level within an interconnected floor space, immediately adjacent to and surrounding the opening, and shall be not less than 500 mm deep measured from ceiling level down to the underside of the draft stop.	No mention of material?Consider including combustibility of material	2 I support this proposed change as is with comment(s).
3.2.8.10.(1)	3.2.8.10. Emergency Power Supply	(1) In a building that is more than 18 m in height, measured between grade and the floor level of the top storey, an emergency power supply capable of operating under a full load for at least 2 h shall be provided by an emergency generator or by a separate service not supplied by the same substation as the primary source for fans required for smoke control purposes in Articles 3.2.8.4., 3.2.8.5., 3.2.8.6. and 3.2.8.9.	(1) In a building that is more than 18 m in height, mea sured between grade and the floor level of the top sto rey, an emergency power supply capable of operating under a full load for at least 2 h shall be provided by an emergency generator or by a separate service not supplied by the same substation as the primary source e for fans required for smoke control purposes in Arti cles 3.2.8.4., 3.2.8.5., 3.2.8.6. and 3.2.8.9.		require additional background - this is not redundanct with 3.2.7.9 Emergency Power Requirements as it includes fans required for smoke control purposes in Articles 3.2.8.4., 3.2.8.5., 3.2.8.6. and 3.2.8.9. Some of these have been deleted but no similar article to NBC 3.2.8.7 Mechanical Exhaust System added.	2 I support this proposed change as is with comment(s).
3.2.8.11.(1)	3.2.8.11. Testing	The systems for smoke control and venting described in Articles 3.2.8.4., 3.2.8.5., 3.2.8.6. and 3.2.8.9. shall be tested to ensure satisfactory operation.	The systems for smoke control and venting described in Articles 3.2.8.4., 3.2.8.5., 3.2.8.6. and 3.2.8.9. shall be tested to ensure satisfactory operation.	N/A	require additional background - this is not redundanct with 3.2.7.9 Emergency Power Requirements as it includes fans in 3.2.8	2 I support this proposed change as is with comment(s).
<u>3.4.3.2.(5.1)</u>	3.4.3.2. Exit Width	N/A	Articles 3.2.8.3. to 3.2.8.8. shall be cumulative, unless (a) the stairs provide not less than 0.3 m <sub>2</sub> of area of treads and landings for each occupant of the interconnected floor space, or (b) protected floor spaces conforming to Article 3.2.8.5. are provided at each floor	The required exit width for exit stairs that serve interconnected floor space designed in accordance with Articles 3.2.8.3. to 3.2.8.8. shall be cumulative, unless (a) the stairs provide not less than 0.3 m <sub>2</sub> of area of treads and landings for each occupant of the interconnected floor space, or (b) protected floor spaces conforming to Article 3.2.8.5. are provided at each floor level and the protected floor space on a floor level has not less than 0.5 m <sub>2</sub> of space for each occupant of that floor level of the interconnected floor space.	Not sure the 0.3 m2 area of tread per occupant is consistent with other areas of the code.	2 I support this proposed change as is with comment(s).
II. MEZZANINES	ļ					
Existing /Proposed Ontario Code Sentence	Existing /Proposed Ontario Code Article Title	Current Ontario Code Provision	Proposed New Ontario Code Provision {with the Tracked Changes}	Proposed New Ontario Code Provision {without the Tracked Changes}	Comments	Rank Status
3.4.2.2.(1)	3.4.2.2. Mezzanine Exiting	Except as permitted by Sentences (2) to (4), a mezzanine shall be provided with exits on the same basis as required for floor areas by this Section.	Except as permitted by Sentences (2) and ( <u>3), the space above</u> a mezzanine shall be provided with <u>served by means of egress leading to</u> exits <u>accessible at the mezzanine level</u> on the same basis as floor areasby this Section.	Except as permitted by Sentences (2) and (3), the space above a mezzanine shall be served by means of egress leading to exits accessible at the mezzanine level on the same basis as floor areas.	Sentence 2 seems to be removed. If sentence 2 remains and is worded to match the NBC this is supportable.	3 I support this proposed change with modification(s).
3.4.2.2.(2)	3.4.2.2. Mezzanine Exiting	A mezzanine need not conform to Sentence (1) provided Article 3.2.8.2. does not require it to terminate at a vertical fire separation.	A mezzanine need not conform to Sentence (1) provi ded Article 3.2.8.2. does not require it to terminate at a vertical fire separation.	N/A	This clause is in the NBC but is worded slightly different - not sure why they are taking it out rather than rewording it. Looks like a mistake	4 I do not support this proposed change for the reason(s) stated to the right.

Existing Ontario Code Sentence	Existing Ontario Code Article Title	Current Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Tracked Changes}	Proposed New Ontario Code Provision { <i>without</i> the Tracked Changes}	Comments	Rank	Status
5.4.1.1.(1)	5.4.1.1. Required Resistance to Air Leakage	Where a building component or assembly separates interior conditioned space from exterior space, interior space from the ground, or environmentally dissimilar interior spaces, the properties and position of the materials and components in those components or assemblies shall be such that they control air leakage or permit venting to the exterior so as to, (a) provide acceptable conditions for the building occupants, (b) maintain	interior conditioned space from exterior space, interior space from the ground, or environmentally dissimilar interior spaces, the properties and position of the materials and components in those components or assemblies shall be such that they control air leakage or permit venting to the exterior so as to, (a) provide acceptable conditions for the building	Where a building component or assembly separates interior conditioned space from exterior space, interior space from the ground, or environmentally dissimilar interior spaces, the properties and position of the materials and components in those components or assemblies shall be such that they control air leakage or permit venting to the exterior so as to, (a) provide acceptable conditions for the building occupants, (b) maintain	matches NBC. Please consider adding Radon table. Otherwise may be a requirement to mitigate something that's not there	2	I support this proposed change as is with comment(s).
		the building component or assembly, (d) control heat transfer to roofs where ice damming can occur, and (e) not compromise the operation of building	condensation in and the penetration of precipitation into the building component or assembly, (d) control	appropriate conditions for the intended use of the building, (c) minimize the accumulation of condensation in and the penetration of precipitation into the building component or assembly, (d) control heat transfer to roofs where ice damming can occur, (e) minimize the ingress of airborne radon from the ground with an aim to controlling the indoor radon concentration to an acceptable level, and (f) not compromise the operation of building services.	Matches NBC. Please consider adding Radon table. Otherwise may be a requirement to mitigate something that's not there	2	I support this proposed change as is with comment(s).
PLUMBING							
7.2.1.3.(2)	7.2.1.3. Identification and Certification	be produced by the person proposing to install or have installed the component, and without such proof the component shall not be installed as a permanent part of any plumbing system.	ced by the person proposing to install or have installe d the component, and without such proof the compon ent shall not be installed as a permanent part of any p lumbing system.		This requirement for visibility is redundant with the end of sentence 1 already.	2	I support this proposed change as is with comment(s).
7.5.6.5.(4)	7565 Terminals	above or not less than 3.5 m in any other direction	the terminal shall be located, (a) not less than 1 000 mmm above or <u>and</u> not less than 3.5 m in any oth er direction from every air inlet, openable window or d	Except for a fresh air inlet, where a vent pipe is terminated in outside air, the terminal shall be located, (a) not less than 1 m above and not less than 3.5 m in any other direction from every air inlet, openable window or door, (b) not less than 2 m above and not less than 3.5 m in any other direction from a roof that supports an occupancy,	Why are they leaving (c) as mm vs m ?		I support this proposed change as is with comment(s).
			(c) not less than 2 000 mm above ground <u>, and</u> (d) not less than 1.8 m from every property line.	(c) not less than 2 000 mm above ground, and (d) not less than 1.8 m from every property line.		1	

7.5.9.2.(2)	7500 1	the flood level rim of the fixture it serves, (b) within the maximum developed length permitted for the vent, (c) not less than 150 mm above insulation materials, and (d) installed in a location not subject to back pressure.	e it serves, <u>drain being vented</u> , (b) within the maxim maked by the fixtue of the fix	Air admittance valves shall be located not less than 100 nm above the fixture drain being vented, b) within the maximum developed length permitted for he vent, and c) not less than 150 mm above insulation materials.	(a) is missing	4 I do not support this proposed change for the reason(s) stated to the right.
SECONDARY S	SUITES					
Current/ Proposed Ontario Code Sentence	Current/ Proposed Ontario Code Article Title	Existing Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Redline Changes}	Proposed New Ontario Code Provision { <i>without</i> the Redline Changes}	Comments	Rank Status
9.5.3.1.(2)	9.5.3.1. Ceiling Heights of Rooms or Spaces	Areas in rooms or spaces over which ceiling height is not less than the minimum specified in Table 9.5.3.1.	Areas in rooms or spaces over which ceiling height is <u>and-clear height are</u> not less than the minimum spe <del>cified in</del>	Areas in rooms or spaces over which ceiling height and clear height are not less than the minimum specified in	Changes are fine. "Area in rooms or spaces shall be contiguous with the entry" seems to change the meaning of the sentence, which is unrelated to ceiling height.	2 I support this proposed change as is with comment(s).
		shall be contiguous with the entry or entries to those rooms or spaces.	Table 9.5.3.1.or Sentence (2) or (3)shall be contiguous with the entry or entries to thoserooms or spaces.	Table 9.5.3.1. or Sentence (2) or (3) shall be contiguous with the entry or entries to those rooms or spaces.		
9.8.9.6.(2)	9.8.9.6. Finish for Treads, Landings and Ramps (See Appendix A)	The finish for treads, landings and ramps within a house or an individual dwelling unit, including those from an attached garage serving a house or an individual dwelling unit, shall be deemed to comply with Sentence (1) where these treads, landings or ramps are finished with,(a) hardwood, (b) vertical grain softwood, (c) resilient flooring, (d) low-pile carpet, (e) mat finish ceramic	The finish for treads, <u>and</u> landings and ramps within a house or an individual <u>of interior st</u> <u>airs in</u> dwelling unit, including those from an attached garage serving a house or an individual dwelling unit <u>units, other than stairs to unfinished</u> <u>basements</u> , shall- be deemed to comply with Sentence (1) where these reads, landings or ramps are finished with,(a) <u>consistor</u>	The finish for treads and landings of interior stairs in dwelling units, other than stairs to unfinished basements, shall consist of hardwood, vertical grain softwood, resilient flooring or other material providing equivalent performance.	Do not agree with the deletion of specific finish materials. Provide justification.	4 I do not support this proposed change for the reason(s) stated to the right.
		tile, (f) concrete, or (g) for stairs to unfinished basements and to garages, plywood.	grain softwood, <del>(c) resilient flooring, (d) low-pile- carpet, (e) mat finish ceramic tile, (f) concrete, or (g) for stairs to unfinished basements and to garages, -plywoodor other material providing equivalent perf ormance.</del>		·	
9.10.14.4.(7)			unprotectedglazed openings <u>stated in Sentence (10)</u> need not apply to the exposing building face of a deta ched garage or accessory building facing a housedwe lling unit, where, (a) the detached garage or accessor	building facing a dwelling unit, where (a) the detached garage or accessory building serves only one dwelling unit, (b) the detached garage or accessory building is located on the same property as that dwelling unit, and (c) the dwelling unit served by the detached garage or accessory building is the only major	Recommend not to replace "unprotected openings" with "glazed openings" because "unprotected openings" is referenced throughout this Article. "stated in Sentence (10)" is removed, but it's not in the original sentence.	3 I support this proposed change with modification(s).
9.10.19.1.(1)	9.10.19.1. Required Smoke Alarms (See Appendix A.)	alarms conforming to CAN/ULC- S531, "Smoke Alarms", shall be installed in,(a) each dwelling unit,	Except as permitted <u>inby Article 9.10.19.8.</u> , smoke alarms conforming to <u>ULC</u> CAN/ULC-S531, ""Smoke Alarms", <u>,</u> shall be installed in,( <u>(</u> a) each	Alarms," shall be installed in (a) each dwelling	Why adding "ULC" in front of "CAN/ULC-S531"?	3 I support this proposed change with modification(s).
		each sleeping room not within a dwelling unit, and (c) each interior shared means of egress and common area in a house.	dwelling unit, (b) each sleeping room not within a dwelling unit, and (c) <del>each interior shared means of egress<u>ancillary spaces</u> and common area<u>spaces not</u> <u>in dwelling units</u> in a house. <u>with a secondary suite.</u></del>	unit, (b) each sleeping room not within a dwelling unit, and (c) ancillary spaces and common spaces not in dwelling units in a house with a secondary suite.		

[		Except as permitted in Article 9.10.19.8., smoke	Except as permitted inby Article-9.10.19.8., smoke	Except as permitted by Article 9.10.19.8., smoke	Why adding "ULC" in fror
9.10.19.1.(1) 9.10.19.1. Required Alarms Smoke Alarms (b) each (c) each		alarms conforming to CAN/ULC- S531, "Smoke Alarms", shall be installed in,(a) each dwelling unit,	alarms conforming to <u>ULC</u> CAN/ULC-S531, "Smoke Alarms", shall be installed in,(a) each dwelling unit, (b) each sleeping room not within a dwelling unit, and (c) each interior shared means of egress <u>ancillary</u> <u>spaces</u> and common- <u>areaspaces not in dwelling</u>	alarms conforming to ULC CAN/ULC-S531, "Smoke Alarms," shall be installed in (a) each dwelling unit, (b)	
			<u>units</u> in a house. <u>with a secondary suite.</u>		
9.19.2.1.(1)	9.19.2.1. Access	Every attic or roof space shall be provided with an access hatch where the attic or roof space, (a) measures not less than, (i) 10 m <sub>2</sub> in area, (ii) 1 000 mm in length or width, and (iii) 600 mm in height over at least the area describe	Every attic or roof space shall be provided with an access hatch where the <u>open space in the</u> attic or roof space, (a) measures not less than, (i) 10 <u>a) 3</u> m <sub>2</sub> or more in a ad ea,	Every attic or roof space shall be provided with an access hatch where the open space in the attic or roof space measures (a) 3 m <sub>2</sub> or more in area, (b) 1 m or more in length or width, and	Reduction in area from 1
9.33.1.1.(1)	9.33.1.1. Design and Installation Requirements	d The design and installation of central heating systems, including requirements for combustion air, shall conform to Part 6 and this Section.	The design and installation of central heating systems, including requirements for combustion air, and air- conditioning Sentence (1) shall conform to Part 6	The design and installation of heating systems, including requirements for combustion air, and air- conditioning systems other than those described in Sentence (1) shall conform to Part 6.	The exception references
systems other that	an those described in				
9.33.3.1.(1)	9.33.3.1. Indoor Design Temperatures	At the outside design temperature, required heating facilities shall be capable of maintaining an indoor a temperature of not less than,(a) 22 °C in all living spaces, (b) 22 °C in unfinished basements, and (c) 15 °C in heated crawl spaces.		At the outside winter design temperature, required heating facilities shall be capable of maintaining an indoor air temperature of not less than (a) 22°C in all living spaces, (b) 18°C in unfinished basements, (c) 18°C in common service rooms, ancillary spaces and exits in houses with a secondary suite, and (d) 15°C in heated crawl spaces.	Do not support changing from 22C to 18C because converted to finished bas facilities should be capab potential living spaces.
STANDPIPE S	SYSTEMS				
Current Ontario Code Sentence	Code Article	Current Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Redline Changes}	Proposed New Ontario Code Provision { <i>without</i> the Redline Changes}	Comments
	Title				
9.10.1.3.(9)	Under Part 3	Standpipe and hose systems shall be designed, constructed and installed in conformance with Article 3.2.5.18. and Subsection 3.2.9.	Standpipe and hose systems shall be designed, constructed and installed in conformance with <u>ArticleArticles 3.2.9.1 18. to 3.2.9.1.</u> and <u>Subsection</u> 3.2. <u>95.18</u> .	Standpipe and hose systems shall be designed, constructed and installed in conformance with Articles 3.2.9.1 to 3.2.9.4. and 3.2.5.18.	This should reference 3.2 3.2.9.7 have been moved
FIRE SPRINKI	LERS, FIRE ALARM	I 1 SYSTEMS AND CARBON MONOXIDE ALAF	RMS		
Current Ontario Code Sentence		Current Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Redline Changes}	Proposed New Ontario Code Provision { <i>without</i> the Redline Changes}	Comments
9.10.19.3.(7)		Smoke alarms required in Sentences (1) and (2) shall be installed on or near the ceiling.	Sentences (1) and (2) shall be installed on or near	Smoke alarms required in Article 9.10.19.1. and Sentences (1) and (2) shall be installed on or near the ceiling.	Smoke alarms installed o carbon monoxide alarms
PLUMBING					
Current Ontario Code Sentence		Current Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Redline Changes}	Proposed New Ontario Code Provision { <i>without</i> the Redline Changes}	Comments
9.31.2.1.(1)	9.31.2.1. General	The construction of plumbing systems shall conform to Part 7.	The construction <u>, extension, alteration, renewal or</u> repair of plumbing systems <u>and sewage disposal</u> systems shall conform to Part 7.	The construction, extension, alteration, renewal or repair of plumbing systems and sewage disposal systems shall conform to Part 7.	Only issue is that every p requires a building permi
<b>MEZZANINES</b>					

MEZZANINES

in front of "CAN/ULC-S531"?	3	I support this proposed change with modification(s).
rom 10 to 3 square metres is arbitrary.	4	I do not support this proposed change for the reason(s) stated to the right.
rences to itself.	4	I do not support this proposed change for the reason(s) stated to the right.
nging temperature for unfinished basement ecause unfinished basement often gets ed basement or secondary suites. Heating capable of supporting this conversion for ses.	4	I do not support this proposed change for the reason(s) stated to the right.
	Pank	Status
ce 3.2.5.8 and 3.2.5.18. Sentences 3.2.9.1 noved or deleted. See Rows 102 - 139	3	I support this proposed change with modification(s).
	Rank	Status
alled on or near ceiling, yet in other parts larms must be mechanically fixed to ceiling ?	3	I support this proposed change with modification(s).
	Rank	Status
very plumbing revision of any nature	4	I do not support this proposed
permit. Sewage disposal Part 8 ?		change for the reason(s) stated to the right.

Current /Proposed Ontario Code Sentence	Current Ontario Code Article Title	Current Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Redline Changes}	Proposed New Ontario Code Provision { <i>without</i> the Redline Changes}	Comments	Rank	( Status
9.10.4.1.(2)	9.10.4.1. Mezzanine Not Considered as Storeys	s floor has no visual obstructions more than 1 070 mm	e purpose of determining building height where they o ccupyThe space above a mezzanine conforming to <u>S</u> entence (2) is permitted to include an aggregateenclo sed space whose area does not exceeding 40exceed	area does not exceed 10% of the open area of the room in which the mezzanine is located, provided the enclosed space does not obstruct visual communication between the open space above the mezzanine and the room in which it is located.		4	I do not support this proposed change for the reason(s) stated to the right.

# TABLE 3: LOW-IMPACT CODE CHANGES

The table below lists approximately 150 Building Code change proposals that have been identified as Low-Impact Existing Variations. Making changes to these requirements in Ontario's Building Code would support Ontario's commitment to increase cross-country Building Code harmonization and better reflect the language and approach of the National Construction Codes. The nature of the proposed changes are straightforward and address issues such as: providing additional clarity, or removing duplication of requirements that are already addressed in referenced standards. The proposed changes are expected to have minimal impact on building design and construction practices.

The first three columns of the tables list Ontario's current Building Code requirements, while the fourth column is a "red-lined" version of the proposed changes, comparing the text of the current Ontario requirements with the proposed requirement based on the corresponding National Construction Code requirements. The red strikethroughs indicate text that is being deleted and the green underlines indicate new text that is being added into the requirements. The fifth column lists the proposed requirements shown in the fourth column in plain text.

It is important to note that these tables contain only the Sentences that are proposed to be changed, all other Sentences will remain unchanged. Furthermore, only the changes captured in the fifth column will be proceeding and all cross-references maintained, unless otherwise marked in the fourth and fifth columns. This may result in Ontario's Articles and Sentences numbering to remain different, though the requirements themselves may be the same.

Please provide your comments and feedback using the following link: https://forms.office.com/r/2tgFLg9WFQ. If you wish to submit any attachments in support of your comments, please email <u>buildingcode.consultation@ontario.ca</u> with the Sentence or Article in the subject area of the email.

### **Div. A Compliance, Objectives and Functional Statements**

### Part 1 Compliance and General

### **Div. B Acceptable Solution**

- Part 3 Fire Protection, Occupant Safety and Accessibility
- Part 4 Structural Design
- Part 5 Environmental Separation
- Part 6 Heating, Ventilating and Air-Conditioning
- Part 7 Plumbing
- Part 9 Housing and Small Buildings

## **Note for MMAH:**

Unless otherwise specified, the proposed codes changes under "Ontario-Only Building Code Changes" were accepted "as-is" or where the OAA had "no comments" were deleted from the list. What remains are the area where OAA had questions or comments.

		12345678901234567890123456789012345678901234567890123456	12345678901234567890123456789012345678901234567890123456	12345678901234567890123456789012345678901234567890123456	
Current Ontario Code Sentence	Ontario Code Section Title	Current Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Tracked Changes}	Proposed New Ontario Code Provision { <i>without</i> the Tracked Changes}	OAA Comments
N/A	Section 1.1. Organization and Application	N/A	Parts 1, 2 and 3 of Division A apply to all buildings covered in this Code.	Parts 1, 2 and 3 of Division A apply to all buildings covered in this Code.	The proposed change deemed unnecessary
N/A	Section 1.1. Organization and Application	N/A	Division C apply to all buildings covered in this Code.	Division C apply to all buildings covered in this Code.	The proposed change deemed unnecessary
3.4.2.3.(1)	3.4.2.3. Distance Between Exits	shall be, (a) one- half the maximum diagonal dimension of the floor area, but need not be more than 9 m for a floor area having a public corridor, or	(2), the least distance between two requiredtwo exits- from a floor area shall be, (a) one- half the maximum diagonal dimension of the floor are a, but need not be more than 9 m for a floor area having a public corridor, or	half the maximum diagonal dimension of the floor area, but need not be more than 9 m for a floor area having a public corridor, or (b) one half the maximum diagonal dimension of the floor area, but not less than 9 m for all other floor	If a floor area only require exit but a second door is provided as a convenienc would it be considered an and then would it required separated? The spacing : only apply to REQUIRED

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nts		Status
changed is cessary.	4	I do not support this proposed change for the reason(s) stated to the right.
changed is cessary.	4	I do not support this proposed change for the reason(s) stated to the right.
y requires ONE door is tvenience, dered an exit required to be spacing should QUIRED exits.	4	I do not support this proposed change for the reason(s) stated to the right.

Current Ontario Code Sentence	Ontario Code Section Title	Current Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Tracked Changes}	Proposed New Ontario Code Provision { <i>without</i> the Tracked Changes}	OAA Comments	Rank	Status
9.8.1.1.(1)	9.8.1.1. General	This Section applies to the design and construction o interior and exterior stairs, steps, ramps, landings, handrails and guards.	f This Section applies to the design and construction o interior and exterior stairs, steps, ramps, landings, handrails and guards.	f This Section applies to the design and construction of interior and exterior stairs, steps, ramps, handrails and guards.	Removal of "landings" causes inconsistency with other parts of this Section. "Landings" is referenced in 9.8 title, 9.8.1.2, 9.8.1.3. There is a note in OBC: "On January 1, 2022, Sentence 9.8.1.1(1) of Division B of the Regulation is amended by adding "landings" after "ramps". (See: O.Reg. 88/18, s 195)"	4	I do not support this proposed change for the reason(s) stated to the right.
9.8.7.4.(2)	9.8.7.4. Height of Handrails	Except as provided in Sentence (3), Clause 3.8.3.4.(1)(e) and Sentence 9.8.4.5A.(1), handrails shall be 865 mm to 1 070 mm high.	Except as provided in Sentence (3) and Clause 3.8.3.4.(1)(e) required and Sentence 9.8.4.5A.(1), handrails shall be 865 m m to 1 070 mm high.	Except as provided in Sentence (3) and Clause 3.8.3.4.(1)(e) required handrails shall be 865 mm to 1 070 mm high.	Crosssing out a new amendment in OBC. 9.8.4.5A. Spiral Stairs was added, effective on January 1, 2022. It has specific requirement on handrail height.	4	I do not support this proposed change for the reason(s) stated to the right.
9.10.16.1.(1)	9.10.16.1. Required Fire Blocks in Concealed Spaces	Concealed spaces in interior walls, ceilings, floors and crawl spaces shall be separated by fire blocks from concealed spaces in exterior walls and attic or roof spaces.	Vertical concealed spaces in interior walls and exterior walls shall be separated by fire blocks (a) one from the other, and (b) from horizontal concealed spaces. And horizontal concealed spaces in attics, roof spaces, ceilings, floors, and crawl spaces shall be separated by fire blocks (a) one from the other, and (b) from vertical concealed spaces.	Vertical concealed spaces in interior walls and exterior walls shall be separated by fire blocks (a) one from the other, and (b) from horizontal concealed spaces. And horizontal concealed spaces in attics, roof spaces, ceilings, floors, and crawl spaces shall be separated by fire blocks (a) one from the other, and (b) from vertical concealed spaces.	Recommend breaking up the sentence into two sentences as in NBC for clarity. 1) Vertical concealed spaces 2) Horizontal concealed spaces	3	I support this proposed change with modification(s).
9.14.2.1.(1)	Wall Drainage	Unless it can be shown to be unnecessary, drainage shall be provided at the bottom of every foundation wall that contains the building interior.	Unless it can be shown to be unnecessary, drainage shall be provided at the bottom of every <u>ex</u> erior foundation wall that contains <u>shall be</u> drained by drainage tile or pipe laid around the building interiore <u>xterior of the foundation in conformance with</u> Subsection 9.14.3. or by a layer of gravel or crushed rock in conformance with Subsection 9.14.4.	drained by drainage tile or pipe laid around the	Is it the intent of the Code to permit granular drainage layer in lieu of drainage tile?	4	I do not support this proposed change for the reason(s) stated to the right.
9.27.13.3.(1)	9.27.13.3. Design and Installation	The design of an exterior insulation finish system shall comply with CAN/ULC-S716.3, "Exterior Insulation and Finish Systems (EIFS) ," Design Application".	The design <u>and installation of</u> an exterior insulation finish system <u>EIFS on the substr</u> <u>ate described in Sentence</u> 9.27.13.2.(2) shall comply with <u>a</u> ) CAN/ULC- S716.3, "2_"Exterior Insulation and Finish Systems (E IFS) , <sup>¬"</sup> _ <u>Installation of EIFS Components and Water Resistiv</u> <u>e Barrier," and b) CAN/ULC-</u> <u>S716.3, "Exterior Insulation and Finish System (EIFS</u> <u>- Design Application".</u>	9.27.13.2.(2) shall comply with a) CAN/ULC- S716.2, "Exterior Insulation and Finish Systems (EIFS) - Installation of EIFS Components and Water Resistive Barrier," and b) CAN/ULC- S716.3, "Exterior Insulation and Finish System (EIFS) - Design Application".	Addition of "on the substrate described in Sentence 9.27.13.2.(2)". It can be intepreted as EIFS without substrate per 9.27.13.2.(2) does not need to be comply with CAN/ULC-S716.3. Is this the intent of the change?	4	I do not support this proposed change for the reason(s) stated to the right.

Current Ontario Code Sentence	Ontario Code Section Title	Current Ontario Code Provision	Proposed New Ontario Code Provision { <i>with</i> the Tracked Changes}	Proposed New Ontario Code Provision { <i>without</i> the Tracked Changes}	OAA Comments	Rank	Status
9.32.3.11.(10)	9.32.3.11. Heat Recovery Ventilators	When operating at the rate required in Article 9.32.3.4., the supply and exhaust airflow rates of the heat recovery ventilator shall be balanced so that the value of the lesser flow shall be at least 90% of the value of the greater flow, unless otherwise recommended by the manufacturer.	WhenWith the principal ventilation fan operating at the rate required in Article 9.32.3.4., the supply and- its normal operating exhaust capacity, the airflow rate s ofin the heat recovery ventilatoroutdoor air supply d uct shall be balanced so that the value of the lesser measured and the flow-regulating damper required by Sentence 9.32.3.13.(2) shall be at least 90% of adjusted and permanently fixed so that the airflow in the valueoutdoor air supply duct is within n ±10% of the greater flow, unless otherwise recommended by the manufactureractual normal operating exhaust capacity of the principal ventilation fan they are installed shall indicate the position of the damper.	With the principal ventilation fan operating at its normal operating exhaust capacity, the airflow in the outdoor air supply duct shall be measured and the flow-regulating damper required by Sentence 9.32.3.13.(2) shall be adjusted and permanently fixed so that the airflow in the outdoor air supply duct is within ±10% of the actual normal operating exhaust capacity of the principal ventilation fan.	9.32.3.13.(2) is for installation requirement, not for when damper is required. Is the airflow intended to be within 10% or +/- 10%?	4	I do not support this proposed change for the reason(s) stated to the right.
9.33.4.1.(1)	9.33.4.1. Application	This Subsection applies to every building that, (a) contains a residential occupancy, and (b) contains a fuel- burning appliance or a storage garage.	This Subsection applies to every building that, (a) contains a residential occupancy, and (b) <u>that</u> <u>also</u> contains (a) a fuel-burning appliance, or (b) a storage garage.	This Subsection applies to every building that contains a residential occupancy and that also contains (a) a fuel-burning appliance, or (b) a storage garage.	Changes made here is different from changes made under A Ontario- Only Building Code Changes (row 86, 87)	4	I do not support this proposed change for the reason(s) stated to the right.
9.34.2.7.(1)	9.34.2.7. Public and Service Areas	Every public or service area in buildings, including a recreational camp and a camp for housing of workers, shall have lighting outlets with fixtures controlled by a wall switch or panel to illuminate such areas.	Every public or service area in buildings, including a recreational camp and a camp for housing of workers, shall havebe provided with lighting outlet s with fixtures controlled by a wall switch or panel to illuminate every portion of such areas.	Every public or service area in buildings shall be provided with lighting outlets with fixtures controlled by a wall switch or panel to illuminate every portion of such areas.	What is the intent of deleting "recreational camp and a camp for housing of workers"? These camps are referenced in Table 9.34.2.7. Lighting for Public Areas.	4	I do not support this proposed change for the reason(s) stated to the right.
9.35.3.1.(2)	9.35.3.1. Foundation Required	Detached garages of less than 55 m2 floor area and not more than 1 storey in height that are not of masonry or masonry veneer construction are permitted to be supported on,(a) wood mud sills, or (b) a concrete floor slab having a minimum thickness of not less than 100 mm.	Detached garages of less than 55 m2 floor area and not more than 1 storey in height that are not of masonry or masonry veneer construction are permitted to be supported on ,( a) wood mud sills, or (b) a <u>100 mm thick</u> concrete f loor slab having a minimum thickness of not less than <u>100 mm</u> .		The change seems unnecessary.	2	I support this proposed change as is with comment(s).