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, 16th Floor, 777 Bay Street Toronto, Ontario M7A 2J3

March 11, 2022

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

The Ontario Association of Architects (OAA) continues to closely watch as the harmonization of the Ontario Building Code (OBC) and National Construction Codes (NCC) takes place.

With such extensive change contemplated within very tight deadlines, the OAA will submit comments on the energy efficiency changes at a later point in time (targeting March 21). The OAA strongly cautions the Ministry it must not adopt any energy efficiency provisions of the National Building Code that move Ontario backward in any way. Such harmonization will only hinder the province in meeting its stated greenhouse gas reduction targets.

The OAA has completed a line-by-line review of Part 1 to Part 9 and, in addition to the comments included on the attached spread sheet, some concerns have been flagged for your consideration.

1. **New Occupancy Type G** – The introduction of a new occupancy type Gcreates important coordination issues between multiple pieces of legislation, as well as technical coordination issues within the building code. The OAA recommends the government consider changing the definition of Industrial Occupancy in the building code instead of creating a new occupancy type. If desired harmonization with the NBC/NFC means it is necessary to create an Agricultural Occupancy type, then it will be necessary to review the associated design requirement provisions. They should be the same as the requirements for Industrial Occupancy in existing legislation.

Provided the Architects Act, Engineers Act, and other affected legislation is suitably amended, the OAA would support the inclusion of farm buildings into the OBC except where other specific comments or objections are noted for specific items in the table. If the government is to proceed with the introduction of this new occupancy, then it should examine how to address the change across all affected pieces of legislation.

2. New Occupancy B4 Home-Type Care – The OAA strongly urges the government to maintain the B4 occupancy as a care occupancy that requires the services of architects and engineers to design it. As the global COVID-19 pandemic has unfolded, the long-term care crisis in Ontario has become increasingly visible and the highest standards of design and patient-centred



quality of life outcomes should be mandated in order to begin fixing this ongoing failure.

- 3. Use of Wired Glass The OAA recommends the government remove the use of wired glass throughout the code. Other products perform at least as well without exposing occupants and first responders to injury from exposed jagged wires.
- 4. **Phenolic Bonded Plywood –** The OAA recommends the government consider removing reference to phenolic bonded plywood throughout the code. Singling out specific products, such as phenolic bonded plywood, may deter the use of less-toxic materials with equivalent performance standards.
- 5. Air Leakage and Radon Penetration The OAA noted that many of the proposed code changes focus on an attempt to seal out radon. Such measures by themselves are known to be ineffective. As such, the OAA recommends the government introduce the requirement of radon testing and monitoring to determine the severity of the problem and effective mitigation strategies to address the problem.

Moreover, government should support all low-cost mitigation measures, such as those that are integrated into existing and low cost sub-grade plumbing and drainage, and/or superstructure ventilation strategies. As the capabilities of smart home controls improve, mitigation strategies will become more effective since the ventilation hardware capability is already present.

General Administrative Comments – While the OAA appreciates that these proposed changes are shared with stakeholders in draft form, it is nonetheless important to point out that overall coordination and crossreferencing is needed throughout. Additionally, the use of new terms, such as "universal shower" as it pertains to item 3.2.7.3 Emergency Lighting, must be supported with additional context and/or definitions. Finally, the OAA urges government to include the tables referred to in the NCC into the Code itself.

The OAA would be happy to discuss the contents of this submission with Ministry staff in more detail. The Association is committed to working alongside the provincial government in order to protect the public interest.

Sincerely,

Susan Speigel, Architect OAA, FRAIC

President



The tables below list the Building Code changes expected to be introduced in the 2020 edition of the National Construction Codes, which the Ministry of Municipal Affairs and Housing is proposing to adopt. The nature of the proposed changes may have substantial impact on building design, construction practices and enforcement. As part of Ontario's harmonization effort, some of the existing Ontario Sentences may be removed or replaced by the corresponding National Construction Code provisions.

The first three columns of the tables list Ontario's current Building Code requirements,

The fourth and fifth columns are their National Construction Code equivalent.

The **sixth column** is a "tracked change" version of the proposed changes, comparing the text of the current Ontario requirements with the proposed requirements being introduced. The red strikethroughs indicate text that is being deleted and the green underlines indicate new text that is being added into the requirements. The **seventh column** lists the corresponding National proposed change form (PCF) that provides additional information on the rationale, justification, and analysis of the code changes.

Columns 8, 9, 10 and 11 are for the committee to add there comments and rate the proposed changes. Refer to Ranking legend tab.

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 sixth column. This may result in Ontario's numbering of Articles and Sentences to remain different, though the requirements themselves may be the same

Division A Compliance, Objectives and Functional Statements

Part 1 Compliance and General

Division B Acceptable Solution

- Part 2 Farm Buildings
- Part 3 Fire Protection, Occupant Safety and Accessibility
- Accessibility
- o Encapsulated Mass Timber Construction
- o Building Fire Safety
- o Penetrations
- o Combustion Construction (Mid Rise Wood Provisions)
- o Fire Alarm and Detections System
- o Fire Protection System Sprinkler System
- o Safety Glazing o Use and Egress o Other Subjects o Miscellaneous
- Part 4 Structural Design
- Part 5 Environmental Separation
- Part 6 Heating, Ventilating and Air-Conditioning
- Part 7 Plumbing
- Part 9 Housing and Small Buildings

Energy Efficiency-related changes

- Part 12 Resource Conservation and Environmental Integrity
- National Energy Code for Buildings
- Section 9.36 Energy Efficiency

* Please refer to the tab named Table 2-Section 9.36

Subject	Current Ontario Code Subsection / Article	Current Ontario Code Provision(s)	Proposed National Code Subsection /Article	Proposed National Code Provision(s)	Proposed Ontario Code Provision(s)	Link to the National PCF	Rank	Status	Comments
Home-type care occupancies	1.1.2.4. Application of Part 9	(1) Subject to Articles 1.1.2.6. and 1.3.1.2., Part 9 of Division B applies to all buildings, (a) of three or fewer storeys in building height, (b) having a building area not exceeding 600 m2, and (c) used for major occupancies classified as, (i) Group C, residential occupancies other than buildings used for retirement homes, (ii) Group D, business and personal services occupancies, (iii) Group E, mercantile occupancies, or (iv) Group F, Divisions 2 and 3, medium hazard industrial occupancies and low hazard industrial occupancies.		(1) Subject to Articles 1.1.2.6. and 1.3.1.2., Part 9 of Division E t applies to all buildings, (a) of three or fewer storeys in building height, (b) having a building area not exceeding 600 m2, and (c) used for major occupancies classified as, (0.i) Group B, Division 4, home-type care occupancies, (i) Group C, residential occupancies other than buildings used for retirement homes, (ii) Group D, business and personal services occupancies, (iii) Group E, mercantile occupancies, or (iv) Group F, Divisions 2 and 3, medium hazard industrial occupancies and low hazard industrial occupancies.	(1) Subject to Articles 1.1.2.6. and 1.3.1.2., Part 9 of Division B applies to all buildings, (a) of three or fewer storeys in building height, (b) having a building area not exceeding 600 m2, and (c) used for major occupancies classified as, (0.) Group B, Division 4, home-type care occupancies, (i) Group C, residential occupancies other than buildings used for retirement homes, (ii) Group D, business and personal services occupancies, (iii) Group E, mercantile occupancies, or (iv) Group F, Divisions 2 and 3, medium hazard industrial occupancies and low hazard industrial occupancies.	https://www.dropbox.e om/s/cf91y4g4g108nz7 /Proposed_Change_131_3. pdf?dl=0	3	I support this proposed change with modification(s).	The proposed home care occupancy should be considered a Group B care occupancy and NOT a residential occupancy. [1.4.1.2.]1.4.1.2. Defined Terms [1]1) The words and terms in italics in this Code shall have the following meanings: Care occupancy means the occupancyor use of a building or part thereof otherthan a home type care occupancy where care is provided to residents. (See Appendix A.) Home-type care occupancy (Group B, Division 4) means the occupancy or use of a building consisting of a single detached housekeeping unit where care is provided to residents and may include the living space of the caregiver and their family. (See Note A-1.4.1.2.(1).)

Large farm buildings	1.1.2.6.A. (new)	N/A	1.3.3.5. Application of Part 2	(1) Part 2 of Division B applies to all buildings that are t (a) more than 600 m2 in building area or more than 3 storeys in building height used for major occupancies classified as Group G, Division 1, 2 or 3 agricultural occupancies, or (b) used for major occupancies classified as Group G, Division 4, agricultural occupancies with no human occupants.	storeys in building height used for major occupancies classified as Group G, Division 1, 2 or 3 agricultural occupancies, or	https://www.dropbox.c om/s/am8alwkwx9wqb 5q/Proposed_Change_1 018.pdf?dl=0	3	I support this proposed change with modification(s).	The requirements for General Review are to be updatd to include *Agricultural Occupancies* on the same basis as *Industrial Ocupancies*: Table 1.2.2.1.(4), General Review Forming Part of Sentence 1.2.2.1.(1) Item Building Classification by Major Occupancy Building Description General Review by: 15. Agricultural occupancy only and where there are no subsidiary occupancies; Every building that exceeds 600 m2 in gross area or 3 storeys in building height; Architect or professional engineer(3) 16. Agricultural occupancy and one or more other major occupancies where the portion of the area occupied by one of the other major or subsidiary occupancies exceeds 600 m2; The non-industrial portion of every building; Architect and professional engineer(1) The industrial portion of every building; Architect or professional engineer(3) 17. Agricultural occupancy and one or more other major occupancies where no portion of the area occupied by one of the other major or subsidiary occupancies exceeds 600 m2; Every building that exceeds 600 m2 in gross area or 3 storeys in building height; Architect or professional engineer(3)
Farm buildings	1.1.2.6.B. (new)	N/A	1.3.3.6. Classification of Buildings Containing Agricultural Occupancies	(1) Buildings or parts of buildings containing an agricultural occupancy that has an occupant load of not more than one person per 40 m2 shall be classified according to their major occupancy as belonging to Group G, Division 1, 2, 3 or 4. (2) Buildings or parts of buildings containing an agricultural occupancy that has an occupant load of	(2) Buildings or parts of buildings containing an agricultural occupancy that has an occupant load of not more than one person per 40 m2 shall be classified according to their major occupancy as belonging to Group G, Division 1, 2, 3 or 4, (2) Buildings or parts of buildings containing an agricultural occupancy that has an occupant load of	https://www.dropbox.c om/s/am8alwkwx9wqb 5q/Proposed_Change_1 018.pdf?dl=0	1	I support this proposed change as is.	See line 67 comments
				more than one person per 40 m² shall be classified according to their major occupancy as belonging to one of the Groups and Divisions listed in Table 3.1.2.1. of Division B. (3) For the purposes of Sentences (1) and (2), the occupant load shall be determined based on the floor area or the part of the floor area that contains the agricultural occupancy. (4) A building intended for use by more than one major occupancy shall be classified according to all the major occupancies for which it is used or intended to be used.	according to their <i>major occupancy</i> as belonging to one of the Groups and Divisions listed in Table 3.1.2.1. of Division B. (3) For the purposes of Sentences (1) and (2), the		1	I support this proposed change as is.	See line 67 comments
Small farm buildings	1.3.1.2. 1.1.1.1. Farm Buildin gs	(1) Except as provided in Sentences (2) to (7), farm buildings shall conform to the requirements in the CCBFC NRCC 38732, "National Farm Building Code of Canada". 1.1.1.2.	1.1.1.3. Application of this Code	(1) Except as provided in Sentences (2) to (7), farm buildings	(1) Except as provided in Sentences (2) to (7), farm buildings not more than 3 storeys in building height and not more than 600 m² in building area used for major occupancies classified as Group G, Division 1, 2, or 3 agricultural occupancies shall conform to the requirements inof the CCBFC NRCC 38732, "National Farm Building Code of Canada".	https://www.dropbox.c om/s/f358kklvewntebk/ Proposed_Change_101_6, pdf?dl=0	2	I support this proposed change as is with comment(s	Ensure that this sentence is maintained: (4) A farm building of low human occupancy having a building area not exceeding 600 m2 and not more than three storeys in building height is deemed to comply with the structural requirements of the CCBFC NRCC 38732, "National Farm Building Code of Canada" if it is designed and constructed in conformance with MMAH Supplementary Standard SB-11, "Construction of Farm Buildings".
Agricultural occupancy	Defined Terms	(1) Each of the words and terms in italics in this Code	1.4.1.2. Defined Terms	(1) Each of the words and terms in italics in this Code Agricultural occupancy means the occupancy of a building or part thereof that is located on land that is	(1) Each of the words and terms in italics in this Code Agricultural occupancy means the occupancy of a building or part thereof that is located on land that is	https://www.dropbox.c om/s/xao0h9r7q3aq6rm /Proposed Change 101 5. pdf?dl=0	3	I support this proposed change with modification(s).	This comment applies to all the proposed changes related to the proposed incorporation of farm buildings into the OBC. It is unnecessary to create a new Agricultural Occupancy type to regulate farm occupancies under the Architects Act. The current definition of Industrial Occupancy in the Architects Act is broader than that in the OBC. In the Architects Act, "industrial occupancy" means occupancy for assembling, fabricating, manufacturing, processing, repairing or storing of goods or materials or for producing, converting, processing or storing of energy, waste or natural resources; ("établissement industriel") It would be simpler to change the definition of Industrial Occupancy in the building code than create a new occupancy type, however if for harmonization with the NBC/NFC it has been decided to create an Agricultural Occupancy type, then it will be necessary to amend the Architects Act to encompass the new occupancy type at the same time. It is recommended that the design requirement provisions for a new Agricultural Occupancy type be the same as for the current Architects Act requirements for Industrial Occupancy. Provided the Architects Act, Engineers Act, and other affected legislation is suitably amended, the OAA would support the inclusion of farm buildings into the OBC unless other specific comments or objections are noted for specific items.
Home-type care occupancies	1.4.1.2. Defined Terms	(1) Each of the words and terms in italics in this Code	1.4.1.2. Defined Terms	(1) Each of the words and terms in italics in this Code Home-type care occupancy (Group B, Division 4) means the occupancy or use of a building consisting of a single detached housekeeping unit where care is provided to residents and may include the living space of the caregiver and their family.	(1) Each of the words and terms in italics in this Code Home-type care occupancy (Group B, Division 4) means the occupancy or use of a building consisting of a single detached housekeeping unit where care is provided to residents and may include the living space of the caregiver and their family.	https://www.dropbox.c om/s/cf91y4g4g108nz7 /Proposed_Change_13_13_ pdf?dl=0	3	I support this proposed change with modification(s).	[1.4.1.2.]1.4.1.2.

Part 2 changes are mainly to address the large Farm building provisions which are new in the National Building Code and therefore there are many new articles added to the Building Code.
 Establishing a new occupancy group may consequentially result in many editorial changes in other parts of the Building Code.

				as well as processes and operations carried out therein that involve a risk of explosion, high flammability or related conditions that create a hazard to life safety.	carried out therein that involve a risk of explosion, high flammability or related conditions that create a hazard to life safety.	h/Proposed_Change_14 17. pdf?dl=0			
Large Farm Buildings - N/A Fire	1	N/A	2.2.1. General	(1) Except as permitted by Sentence (2) and required by Sentence (3), fuel-fired <i>appliances</i> shall be	(1) Except as permitted by Sentence (2) and required by Sentence (3), fuel- fired appliances shall be	https://www.dropbox.c om/s/5whijqx63htoqef/	4		This will not function in a G3 greenhouse. There are also problems with fire separations. Architects Act will require amendment to address the new occupancy type issue
Protection and Occupant Safety			2.2.1.9. Additional Fire Separations	installed in service rooms separated from the remainder of the farm building by (a) a fire separation having a fire-resistance rating not less than 45 min in a floor area that is not sprinklered throughout, or (b) a fire separation not required to have a fire- resistance rating in a floor area that is sprinklered throughout. (2) A fuel-fired appliance that serves only one room is not required to be installed in a service room separated from the remainder of the farm building. (3) Incinerators shall be installed in service rooms that a) do not contain other fuel-fired appliances, and b) are separated from the remainder of the farm building by a fire separation having a fire-resistance rating not less than (i) 2 h, where the service room is adjacent to a Group G, Division 1 major occupancy in a floor area that is not sprinklered throughout, (iii) 1 h, where the service room is adjacent to a Group G, Division 2 or 3 major occupancy in a floor area that is sprinklered throughout, or (iv) 30 min, where the service room is adjacent to a Group G, Division 2 or 3 major occupancy in a floor area that is not sprinklered throughout, or (iv) 30 min, where the service room is adjacent to a Group G, Division 2 or 3 major occupancy in a floor area that is not sprinklered throughout, or (iv) 30 min, where the service room is adjacent to a Group G, Division 2 or 3 major occupancy in a floor area that is not sprinklered throughout, or (iv) 3 min, where the service room is adjacent to a Group G, Division 2 or 3 major occupancy in a floor area that is not sprinklered throughout. (4) A room containing a device that produces open flames, heat or sparks and used for crop drying shall be separated from the remainder of the farm building by a fire separation having a fire-resistance rating not less than 45 min in a floor area that is not sprinklered throughout, or (b) a fire separation having a fire-resistance rating not less than (a) I h, in a floor area that is not sprinklered throughout, or (b) 30 min, in a floor area th	installed in service rooms separated from the remainder of the farm building by (a) a fire separation having a fire-resistance rating not less than 45 min in a floor area that is not sprinklered throughout, or (b) a fire separation not required to have a fire- resistance rating in a floor area that is sprinklered throughout. (2) A fuel-fired appliance that serves only one room is not required to be installed in a service room separated from the remainder of the farm building. (3) Incinerators shall be installed in service rooms that a) do not contain other fuel- fired appliances, and b) are separated from the remainder of the farm building by a fire separation having a fire-resistance rating not less than (i) 2 h, where the service room is adjacent to a Group G, Division 1 major occupancy in a floor area that is not sprinklered throughout. (ii) 1 h, where the service room is adjacent to a Group G, Division 2 or 3 major occupancy in a floor area that is sprinklered throughout, (iii) 1 h, where the service room is adjacent to a Group G, Division 2 or 3 major occupancy in a floor area that is not sprinklered throughout, or (iv) 30 min, where the service room is adjacent to a Group G, Division 2 or 3 major occupancy in a floor area that is not sprinklered throughout, or (iv) 30 min, where the service room is adjacent to a Group G, Division 2 or 3 major occupancy in a floor area that is sprinklered throughout. (4) A room containing a device that produces open flames, heat or sparks and used for crop drying shall be separated from the remainder of the farm building by (a) a fire separation having a fire-resistance rating not less than 45 min in a floor area that is sprinklered throughout. (5) A room intended to be used for repairing farm machinery shall be separated from the remainder of the farm building by a fire separation having a fire-resistance rating not less than (a) 1 h, in a floor area that is not sprinklered throughout. (b) 30 min, in a floor area that is sprinklered throughout. (c) Storage areas for dang	Proposed_Change_141.8. pdf?dl=0	4	I do not support this proposed change for the reason(s) stated to the right.	Sentence (2) conflicts with item 2.4.3.1. (line 171)

Large Farm Buildings - N/A Fire Protection and	N/A	2.2.1. General 2.2.1.14. Fabrics		(1) Fabrics and films used in connection with tents and air- supported structures shall conform to CAN/ULC-	https://www.dropbox.c om/s/5whijqx63htoqef/	4	I do not support this proposed change for the reason(s) stated such as polyethylene sheeting to also be regulated as a tent?
Occupant Safety		and Films	"Standard Method for Flame Tests of Flame-Resistant Fabrics and Films."	S109, "Standard Method for Flame Tests of Flame-ResistantFabricsandFilms."	Proposed_Change_141 8. pdf?dl=0		to the right.
Large Farm Buildings - N/A Fire	N/A	2.2.1. General 2.2.1.15. Electrical	(1) The installation of electrical wiring and electrical equipment shall conform to the requirements of	(1) The installation of electrical wiring and electrical equipment shall conform to the requirements of	https://www.dropbox.c om/s/5whijqx63htoqef/	4	I do not support this proposed change for the reason(s) stated to the right. This will create confusion amongst architects, engineers and authorities having jurisdiction as there would be 2 inconsistent codes to follow. Which one governs in case of inconsistency?
Protection and Occupant Safety		Detection Systems 2.2.3.3. Design of Fire Alarm Systems	I storey, and (b) a manual station shall be installed in every floor area near every exit.	(a) the air-handling system, where provided, shall be designed to prevent the circulation of smoke upon a signal from a duct-type smoke detector if the air-handling system serves more than 1 storey, and (b) a manual station shall be installed in every floor area near every exit.	Proposed_Change_141.8. pdf?dl=0	4	I do not support this proposed change for the reason(s) stated to the right. Clarification required - what is difference between air-handling system and line 82 - fuel fired appliance with respect to air ducts?
Large Farm Buildings - N/A Fire Protection and Occupant Safety	N/A	2.2.4. Provisions for Firefighting 2.2.4.1. Fire Department Access to Buildings	(1) Access for fire department equipment shall be provided to each farm building by means of a street, private roadway or yard. (2) Where access to a farm building as required in Sentence (1) is provided by means of a roadway or yard, the design and location of such roadway or yard shall take into account connection with public thoroughfares, weight of firefighting equipment, width of roadway, radius of curves, overhead clearance, location of fire hydrants, location of fire department connections and vehicular parking.	(1) Access for fire department equipment shall be provided to each farm building by means of a street, private roadway or yard. (2) Where access to a farm building as required in Sentence (1) is provided by means of a roadway or yard, the design and location of such roadway or yard shall take into account connection with public thoroughfares, weight of firefighting equipment, width of roadway, radius of curves, overhead clearance, location of fire hydrants, location of fire department connections and vehicular parking.	https://www.dropbox.c om/s/5whijqx63htoqef/ Proposed_Change_141_8. pdf?dl=0	4	I do not support this proposed change for the reason(s) stated to the right. This will decimate rural farms and greenhouses by requiring farmers to add their own water supply tanks or ponds that will far exceed \$250,000 in cost.
Large Farm Buildings - N/A Fire Protection and Occupant Safety	N/A	2.2.4. Provisions for Firefighting 2.2.4.2. Automatic Sprinkler System	shall be equipped with waterflow- detecting devices that are (a) installed in accordance with Sentence 3.2.4.17.(1), and (b) connected to (i) the fire alarm system, where provided, so that, upon its actuation, an <i>alert signal</i> or an <i>alarm signal</i> is initiated, or (ii) an audible signal device, where a fire alarm system is not provided.	(1), it shall conform to Article 3.2.5.19. (3) The automatic sprinkler system referred to in Sentence (1) shall be equipped with waterflow- detecting devices that are (a) installed in accordance with Sentence 3.2.4.17.(1), and (b) connected to (i) the fire alarm system, where provided, so that, upon its actuation, an <i>alert signal</i> or an <i>alarm signal</i> is initiated, or (ii) an audible signal device, where a fire alarm system is not provided.	https://www.dropbox.e om/s/5whijqx63htoqef/ Proposed_Change_141_8. pdf?dl=0	4	I do not support this proposed change for the reason(s) stated to the right. This may only be possible in urban areas or for very large expensive buildings - whose owners have the ability and budget to provide for all the sprinkler items, outside piping, outside water supply and emergency power generator to power all this equipment.
Large Farm Buildings - N/A Fire Protection and Occupant Safety	N/A	2.2.4. Provisions for Firefighting 2.2.4.3. Portable Fire Extinguishe	(1) Portable extinguishers shall be provided and installed in accordance with the provisions of Part 6 of Division B of the Fire Code made under the <i>Fire Protection and Prevention Act</i> , 1997.	(1) Portable extinguishers shall be provided and installed in accordance with the provisions of Part 6 of Division B of the Fire Code made under the Fire Protection and Prevention Act, 1997.	https://www.dropbox.c om/s/5whijqx63htoqef/ Proposed_Change_141_8, pdf?dl=0	4	I do not support this proposed change for the reason(s) stated to the right. How is this to be applied to a G3 plastic greenhouse that is unheated in winter?
Large Farm Buildings - N/A Fire Protection and Occupant Safety	N/A	2.2.5. Emergency Lighting 2.2.5.1. Minimum Lighting Requirements	(1) Where lighting is provided in a farm building, emergency lighting shall be provided to an average level of illumination not less than 10 lx at floor or tread level in (a) exits, and (b) principal routes providing access to exit in open floor areas and in service rooms. (2) The minimum value of the illumination required by Sentence (1) shall be 1 lx. (3) An emergency power supply shall be (a) provided to maintain the emergency lighting required by Sentence (1) from a power source such as batteries or generators that will continue to supply power in the event that the regular power supply to the farm building is interrupted, and (b) designed and installed such that, upon failure of the regular power, it will assume the electrical load automatically for a period of 30 min.	(1) Where lighting is provided in a <i>farm building</i> , emergency lighting shall be provided to an average level of illumination not less than 10 lx at floor or tread level in (a) exits, and (b) principal routes providing access to exit in open floor areas and in service rooms. (2) The minimum value of the illumination required by Sentence (1) shall be 1 lx. (3) An emergency power supply shall be (a) provided to maintain the emergency lighting required by Sentence (1) from a power source such as batteries or generators that will continue to supply power in the event that the regular power supply to the <i>farm building</i> is interrupted, and (b) designed and installed such that, upon failure of the regular power, it will assume the electrical load automatically for a period of 30 min.	https://www.dropbox.e om/s/5whijqx63htoqef/ Proposed_Change_141.8. pdf?dl=0	4	I do not support this proposed change for the reason(s) stated to the right. How is this to be applied if no lighting is provided in a G3 plastic greenhouse or if the only lighting consistes of special purpose "grow" lights rather than general illumination? This clause requires co-ordination to ther parts of the OBC, before implementation.
Large Farm Buildings - N/A Fire Protection and Occupant Safety	N/A	2.2.6. Safety within Farm Buildings 2.2.6.1. Means o Egress	(1) Means of egress complying with this Subsection shall be provided from every floor area containing a Group G, Division 1, 2 or 3 major occupancy.	Group G, Division 1, 2 or 3 major occupancy. (2) If a platform or contained open space is provided, egress requirements shall conform to the appropriate requirements of Article 2.2.6.2. for rooms.	https://www.dropbox.c om/s/5whijqx63htoqef/ Proposed Change_141 8. pdf?dl=0	3	I support this proposed change with modification(s). Requires clarification for 2.2.6.2
Large Farm Buildings - N/A Fire Protection and Occupant Safety	N/A	2.2.6. Safety within Farm Buildings 2.2.6.2. Egress Doorways	(1) Except as provided in Sentence (2), at least one egress doorway shall be provided from every room. (2) A minimum of 2 egress doorways located so that one doorway could provide egress from the room as required by Article 2.2.6.3. if the other doorway becomes inaccessible to the occupants due to a fire originating in the room, shall be provided for every room (a) that is used for a Group G, Division 1 major occupancy, other than one housing livestock with a below-floor storage area for liquid manure, where the area of the room is more than (i) 15 m2, in a floor area that is not sprinklered throughout, or	(1) Except as provided in Sentence (2), at least one egress doorway shall be provided from every room. (2) A minimum of 2 egress doorways located so that one doorway could provide egress from the room as required by Article 2.2.6.3. if the other doorway becomes inaccessible to the occupants due to a fire originating in the room, shall be provided for every room (a) that is used for a Group G, Division 1 major occupancy, other than one housing livestock with a below-	https://www.dropbox.c om/s/5whijqx63htoqef/ Proposed_Change_141 8. pdf?dl=0	3	I support this proposed change with modification(s). This conflicts with item 2.2.7.6.

			(ii) 30 m2, in a floor area that is sprinklered	(ii) 30 m2, in a <i>floor area</i> that is <i>sprinklered</i> throughout,				
			throughout,	(b) in a <i>floor area</i> that is not <i>sprinklered</i> throughout and contains a Group G,				
			(b) in a <i>floor area</i> that is not <i>sprinklered</i> throughout and contains a Group G, Division 1 <i>major occupancy</i> housing	Division 1 <i>major occupancy</i> housing livestock with a below-floor storage area for liquid manure or a Group G, Division 2 or 3 <i>major occupancy</i> , where				
			livestock with a below-floor storage area for liquid manure or					
			Group G, Division 2 or 3 major occupancy, where	(ii) the travel distance within the room to the nearest egress doorway is more than				
			(i) the area of the room is more than 200 m2, or	15 m, or				
			(ii) the travel distance within the room to the nearest egress	(c) in a floor area that is sprinklered throughout				
			doorway is more than 15 m, or	and contains a Group G, Division 1 major				
			(c) in a <i>floor area</i> that is <i>sprinklered</i> throughout and contains a					
			Group G, Division 1 major occupancy housing livestock with					
			below- floor storage area for liquid manure or a Group G,	(i) the area of the room is more than 300 m2, or				
			Division 2 or 3 <i>major occupancy</i> , where (i) the area of the room is more than 300 m2, or	(ii) the travel distance within the room to the nearest egress doorway is more than 25 m.				
			(ii) the travel distance within the room to the nearest egress	(3) Where 2 egress doorways are required by				
			doorway is more than 25 m.	Sentence (2), they shall be placed at a distance from				
			(3) Where 2 egress doorways are required by Sentence (2), the					
			shall be placed at a distance from one another equal to or	maximum overall diagonal dimension of the area to				
			greater than one third of the maximum overall diagonal	be served, measured as the shortest distance that				
			dimension of the area to be served, measured as the shortest	smoke would have to travel between the nearest required egress doorways.				
			distance that smoke would have to travel between the nearest					
Large Farm Buildings - N/A	N/A	2.2.6. Safety	required egress doorways.	(1) If more than one egress doorway is required from	https://www.draphay.a	2	Leunnart this proposed	Conflicts with item 2.2.7.5.
Fire Protection and	19/73	within Farm	(1) If more than one egress doorway is required from a room referred to in Sentence 2.2.6.2.(2), the travel distance within the	(1) If more than one egress doorway is required from	https://www.dropbox.c om/s/5whijqx63htoqef/	3	I support this proposed change with modification(s).	Commets with RCIII 2.2.7.3.
Occupant Safety		Buildings	room to the nearest egress doorway shall not exceed the	distance within the room to the nearest egress	Proposed Change 141 8.		change with mounteation(s).	
- Tupun Surviy		2.2.6.3. Travel	maximum travel distance specified in Article 2.2.7.5. for <i>exits</i> .	doorway shall not exceed the maximum travel	pdf?dl=0			
		Distance		distance specified in Article 2.2.7.5. for exits.	-			
Large Farm Buildings - N/A	N/A	2.2.6. Safety	(1) The minimum width of an access to exit, including	(1) The minimum width of an access to exit, including obstructions, shall be 750 mm.	https://www.dropbox.c	4	I do not support this proposed	This confleits with OBC 3.8 - which clause governs?
Fire Protection and		within Farm	obstructions, shall be 750 mm.	(2) A fuel-fired appliance shall not be installed in a	om/s/5whijqx63htoqef/		change for the reason(s) stated	
Occupant Safety		Buildings	(2) A fuel-fired <i>appliance</i> shall not be installed in a corridor	corridor serving as an access to exit.	Proposed_Change_141 8.		to the right.	
			serving as an access to exit.		pdf?dl=0			
Large Farm Buildings - N/A	N/A	2.2.6. Safety	(1) Except as provided in Sentence (2), a door that provides	(1) Except as provided in Sentence (2), a door that	https://www.dropbox.c	4		Sliding door conflicts with other requirements.
Fire Protection and Occupant Safety		within Farm Buildings	access to exit from a room shall (a) be a sliding door, or	provides access to exit from a room shall	om/s/5whijqx63htoqef/		change for the reason(s) stated to the right.	
Occupant Safety		2.2.6.6. Door	(b) swing on a vertical axis.	(a) be a sliding door, or (b) swing on a vertical axis.	Proposed_Change_141 8. pdf?dl=0		to the right.	
		Swing	(2) A door that opens into a facility providing <i>access to exit</i>	(2) A door that opens into a facility providing <i>access</i>	par:ar o			
		5 mig	from a room that is used for a Group G, Division 1 <i>major</i>	to exit from a room that is used for a Group G,				
			occupancy, other than one housing livestock with a below-floo	Division 1 major occupancy, other than one housing livestock with a below-				
			storage area for liquid manure, shall swing on a vertical axis in	floor storage area for liquid manure, shall swing on a vertical axis in the direction				
			the direction of travel to the exit.	of travel to the exit.				
Large Farm Buildings - N/A	N/A	2.2.6. Safety	(1) A door that provides access to exit from a room shall	(1) A door that provides access to exit from a room shall	https://www.dropbox.c	3	I support this proposed	Conflicts with items 2.2.7.7. & 2.2.7.8.
Fire Protection and		within Farm	(a) provide a clear opening of not less than 750 mm if there is	(a) provide a clear opening of not less than 750 mm if there is only one door leaf.	om/s/5whijqx63htoqef/		change with modification(s).	
Occupant Safety		Buildings	only one door leaf, d (b) in a doorway with multiple leaves, have the active leaf	(b) in a doorway with multiple leaves, have the	Proposed_Change_141 8. pdf?dl=0			
		Door Hardware	providing a clear opening of not less than 750 mm,	active leaf providing a clear opening of not less than 750 mm, (c) not open onto a step, and	parrai-o			
		Door Hardware	(c) not open onto a step, and	(d) except as provided in Sentence (2), have a				
			(d) except as provided in Sentence (2), have a threshold not	threshold not more than 13 mm higher than the surrounding finished floor surface.				
			more than 13 mm higher than the surrounding finished floor	(2) The door referred to in Sentence (1) is permitted				
			surface.	to have a threshold not more than 100 mm higher				
			(2) The door referred to in Sentence (1) is permitted to have a	than the surrounding finished floor surface, where the threshold is used to confine				
			threshold not more than 100 mm higher than the surrounding	(a) the spillage of liquids classified as				
			finished floor surface, where the threshold is used to confine (a) the spillage of liquids classified as	dangerous goods within a room, or				
			dangerous goods within a room, or	(b) animal litter within an animal containment area. (3) Door release hardware shall conform to Article 2.2.7.8.				
			(b) animal litter within an animal containment area.	(5) Door release nardware sharr comorni to Article 2.2.7.8.				
			(3) Door release hardware shall conform to Article 2.2.7.8.					
Large Farm Buildings - N/A	N/A	2.2.6. Safety	(1) Except as permitted by Sentence (3), ramps and stairways	(1) Except as permitted by Sentence (3), ramps and	https://www.dropbox.c	2	I support this proposed	Agricultural Occupancies added to 3.8 exemptions .
Fire Protection and		within Farm	that do not serve as exits shall	stairways that do not serve as exits shall	om/s/5whijqx63htoqef/		change as is with comment(s).	
Occupant Safety		Buildings	(a) be not less than 750 mm wide, and	(a) be not less than 750 mm wide, and	Proposed_Change_141 8.			This conflicts with OBC part 3.8; Clause (c) should allow exemption for
		2.2.6.8. Ramps	(b) conform to Articles 3.3.1.15., 3.4.3.5.,	(b) conform to Articles 3.3.1.15., 3.4.3.5., 3.4.6.1. to 3.4.6.3., 3.4.6.8. and 3.4.6.9.	pdf?dl=0			Agricultural Occupancies with occupant loads less than 40 persons - 3.8.1.1.
		and Stairways	3.4.6.1. to 3.4.6.3., 3.4.6.8. and 3.4.6.9. (2) Except as permitted by Sentence (3), the maximum slope o	(2) Except as permitted by Sentence (3), the				Application (1) The requirements of this Section apply to all buildings except
			a ramp shall be 1 in 6.	(3) Ramps and stairways need not comply with Sentences (1) and (2), provided				(1) The requirements of this Section apply to all buildings except, (a) houses, triplexes and boarding or rooming houses with fewer than
			(3) Ramps and stairways need not comply with Sentences (1)	(a) they are intended only				8 boarders or roomers.
			and (2), provided	<u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>				(b) buildings of Group F, Division 1 major occupancy,
			(a) they are intended only					(c) buildings that are not intended to be occupied on a daily or full
			(i) for occasional use for servicing equipment and machinery,	(i) for occasional use for servicing equipment and machinery, or				time basis, including automatic telephone exchanges, pumphouses and
			or	(ii) for use as animal handling ramps, and (b) they do not serve as exits.				substations, Agricultural Occupancies and
			(ii) for use as animal handling ramps, and					(d) camps for housing of workers.
			(b) they do not serve as <i>exits</i> .					
-			•		•			1

Post of in the last	100057	(c) 20 m in . (1)	(c) 20 m in a flat contains a C	Decree 1 Class 141 0		The control of the Control of the 22.62
Protection and Occupant Safety	2.2.7.5. Location of Exits	(a) 30 m, in a floor area that contains a Group G, Division 1 major occupancy, other than one housing livestock with a below-floor storage area for liquid manure, (b) 60 m, in a floor area that contains a Group G, Division 1 major occupancy housing livestock with a below-floor storage area for liquid manure, (c) 60 m, in a floor area that contains a Group G, Division 2 or 3 major occupancy and that is not sprinklered throughout, and (d) 90 m, in a floor area that contains a Group G, Division 2 or 3 major occupancy and that is sprinklered throughout, and (2) A floor area containing a Group G, Division 3 major occupancy need not comply with Sentence (1), provided (a) exits are placed not more than 60 m apart along the perimeter of the floor area, and (b) eachmain aisle in the floor area (i) leads directly to an exit in at least two opposite directions, and (ii) has a minimum width of 750 mm. (3) Exits shall be located and arranged in conformance with	(a) 30 m, in a floor area that contains a Group G, Division 1 major occupancy, other than one housing livestock with a below- floor storage area for liquid manure, (b) 60 m, in a floor area that contains a Group G, Division 1 major occupancy housing livestock with a below-floor storage area for liquid manure, (c) 60 m, in a floor area that contains a Group G, Division 2 or 3 major occupancy and that is not sprinklered throughout, and (d) 90 m, in a floor area that contains a Group G, Division 2 or 3 major occupancy and that is sprinklered throughout. (2) A floor area containing a Group G, Division 3 major occupancy need not comply with Sentence (1), provided (a) exits are placed not more than 60 m apart along the perimeter of the floor area, and (b) eachmain aisle in the floor area (i) leads directly to an exit in at least two opposite directions, and (ii) has a minimum width of 750 mm. (3) Exits shall be located and arranged in conformance with Sentence 3.4.2.5.(3).	Proposed_Change_141 8. pdf?dl=0	2	I support this proposed change as is with comment(s). Conflicts with item 2.2.6.3.
Large Farm Buildings - N/A N/A Fire Protection and Occupant Safety		Sentence 3.4.2.5.(3). (1) The minimum clear width of an exterior doorway used as an exit shall be 750 mm. (2) Except as provided in Sentence (3), the minimum headroom clearance in every exit shall conform to Article 3.4.3.5. (3) An openable window or panel used as an exit shall have (a) an opening not less than 900 mm by 550 mm, and (b) a fire escape or stair, where required by Article 2.2.7.9.	used as an exit shall be 750 mm.	https://www.dropbox.e om/s/5whijqx63htoqef/ Proposed_Change_141 8, pdf?dl=0	4	I do not support this proposed change for the reason(s) stated to the right. Clarification required for consistency with other OBC clauses related to fire escape details, open stairs, enclosed stairs, and stair details. Which provisions will take precedence?
Large Farm Buildings - N/A N/A Fire Protection and Occupant Safety	2.2.7. Exits 2.2.7.7. Direction of Exit Door Swing	(1) Except as permitted by Sentence (2), every <i>exit</i> door shall (a) open in the direction of <i>exit</i> travel, and (b) swing on its vertical axis. (2) <i>Exit</i> doors that serve a Group G, Division 2 <i>major</i> occupancy housing animals need not conform to Clause (1)(a).	(1) Except as permitted by Sentence (2), every exit door shall (a) open in the direction of exit travel, and (b) swing on its vertical axis. (2) Exit doors that serve a Group G, Division 2 major occupancy housing animals need not conform to Clause (1)(a).	https://www.dropbox.c om/s/5whijqx63htoqef/ Proposed_Change_141 8, pdf?dl=0	4	I do not support this proposed change for the reason(s) stated to the right. Conflicts with 2.2.6.7.
Large Farm Buildings - Fire Protection and Occupant Safety	2.2.7. Exits 2.2.7.8. Exit Door Hardware	(1) Door release hardware on exit doors shall (a) be operable with one hand, (b) permit the door to be readily opened from the inside with not more than one releasing operation and without requiring keys, special devices or specialized knowledge of the door- opening mechanism, and (c) be installed not more than 1 200 mm above the finished floor.	(1) Door release hardware on exit doors shall (a) be operable with one hand, (b) permit the door to be readily opened from the inside with not more than one releasing operation and without requiring keys, special devices or specialized knowledge of the door- opening mechanism, and (c) be installed not more than 1 200 mm above the finished floor.	https://www.dropbox.c om/s/5whijqx63htoqef/ Proposed_Change_141 8. pdf?dl=0	4	I do not support this proposed change for the reason(s) stated to the right.
Large Farm Buildings - Fire Protection and Occupant Safety	2.2.8. Hazardous Substances, Processes and Equipment 2.2.8.1. General	(1) Except as provided in Sentences (2) to (4), the storage, handling and use of hazardous substances shall be in conformance with (a) the Fire Code made under the Fire Protection and Prevention Act, 1997, or (b) the CCBFC NRCC 56912, "National Fire Code of Canada", in the absence of regulations referred to in Clause (a). (2) Farm buildings or parts of farm buildings used for the storage, handling, use and processing of dangerous goods shall comply with Articles 3.3.6.1. to 3.3.6.7. (3) The production, handling, storage and utilization of biogas shall be in conformance with ANSI/CSA-B149.6, "Code for digester gas, landfill gas, and biogas generation and utilization." (4) Where the Fire Code made under the Fire Protection and Prevention Act, 1997 applies due to	of biogas shall be in conformance with ANSI/CSA- B149. 6, "Code for digester gas, landfill gas, and biogas generation and utilization." (4) Where the Fire Code made under the Fire Protection and Prevention Act, 1997 applies due to	https://www.dropbox.c om/s/5whijqx63htoqef/ Proposed_Change_141 8, pdf?dl=0	4	I do not support this proposed change for the reason(s) stated to the right. Architect Act amendment issue. Potential conflicts with Ministry of Agriculture regulations. Who determines FPPA issues for a building permit? - the applicant, the CBO, the Fire Chief, or some other authority in rural areas?
		the quantity and nature of the stored product, <i>farm buildings</i> used for the storage of ammonium nitrate shall	the quantity and nature of the stored product, farm buildings used for the storage of ammonium nitrate shall (a) be classified as Group G, Division 2 major occupancies, and (b) comply with Article 3.3.6.6. (5) Systems for the ventilation of cooking equipment that is used in processes producing grease-laden vapours shall be designed and installed in conformance with Articles 3.6.3.5. and 6.2.2.6.			
Large Farm Buildings - N/A N/A Fire Protection and Occupant Safety	2.2.8. Hazardous Substances, Processes and Equipment 2.2.8.7. Dangerous Goods Storage	(1) The storage of dangerous goods in packages or containers in farm buildings or parts of farm buildings shall comply with Parts 3 and 4 of Division B of the CCBFC NRCC 56192, "National Fire Code of Canada".	(1) The storage of dangerous goods in packages or containers in farm buildings or parts of farm buildings shall comply with Parts 3 and 4 of Division B of the CCBFC NRCC 56192, "National Fire Code of Canada".	https://www.dropbox.c om/s/5whijqx63htoqef/ Proposed_Change_141 8. pdf?dl=0	2	I support this proposed change as is with comment(s). Why NFC and not the FPPA in Ontario ?
Large Farm Buildings Technical Provisions -		(1) Fuel-fired heating <i>appliances</i> shall be located and separated from the remainder of the <i>farm building</i> in conformance with Article 2.2.1.9.	(1) Fuel-fired heating <i>appliances</i> shall be located and separated from the remainder of the <i>farm building</i> in conformance with Article 2.2.1.9.	https://www.dropbox.c om/s/tqun1ctl4t3i4j5/P roposed_Change_1419 .pdf?dl=0	4	I do not support this proposed change for the reason(s) stated to the right. Conflicts with item 2.2.1.9.(5) (line 82)

	Current		Proposed			Link(s) to the
	Ontario		National			National PCF(s)
Subject	Code	Current Ontario Code Provision(s)	Code	Proposed National Code Provision(s)	Proposed Ontario Code Provision(s)	
	Subsection/		Subsection/			
	Article		Article			

Rank Status Comments	
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Accessibility - Inclusive signage	3.4.6.19. Floor Numbering	(1) Arabic numerals indicating the assigned floor number shall, (a) be mounted permanently on each side of doors to exit stair shafts, (b) be not less than 60 mm high, raised approximately 0.7 mm above the surface, (c) be located 1 500 mm from the finished floor, and (d) be contrasting in colour with the surface to which they are applied. (2) Upper case letters indicating the designation assigned to each exit stair shaft shall be mounted permanently on each side of doors to the exit stair shaft and shall, (a) be not less than 60 mm high, raised approximately 0.7 mm above the surface, (b) be located 1 500 mm from the finished floor, and (c) be contrasting in colour with the surface on which they are applied.		(1) Arabic numerals indicating the assigned floor number in both visual and tactile forms in accordance with Subsection 3.8.3. shall be mounted permanently on the wall on the stair side and on the floor side at the latch side of doors to exit stair shafts. (2) Upper case letters indicating the designation assigned to each exit stair shaft in both visual and tactile forms in accordance with Subsection 3.8.3. shall be mounted permanently on the wall on the stair side and on the floor side at the latch side of doors to exit stair shafts.	(1) Arabic numerals indicating the assigned floor number in both visual and tactile forms in accordance with Subsection 3.8.3. shall, (a) be mounted permanently on each the wall on the stair side and on the floor side at the latch side of doors to exit stair shafts; (b) be not less than 60 mm high, raised approximately 0.7 mm above the surface, (c) be located 1 500 mm from the finished floor, and (d) be contrasting in colour with the surface to which they are applied. (2) Upper case letters indicating the designation assigned to each exit stair shaft in both visual and tactile forms in accordance with Subsection 3.8.3, shall be mounted permanently on each the wall on the stair side and on the floor side at the latch side of doors to the exit stair shaft and shall, (a) be not less than 60 mm high, raised approximately 0.7 mm above the surface,	https://www.dropbox.c om/s/ptc0nyfpxkme8z8 /Proposed_Change_15 61. pdf?dl=0	4		This proposed change to meet NBC requirements, reduces the level of AODA/Barrier Free measures in Ontario OBC. Do not recommend deleting all the subclauses, retain Ontario-specific subclauses.
Accessibility	3.2.7.3. Emergency Lighting	N/A	3.2.7.3. Emergency Lighting	(1) Emergency lighting shall be provided to an average level of illumination not less than 10 lx at floor or tread level in, (o) universal washrooms, universal shower rooms and accessible change spaces required by Article 3.8.2.3.	(1) Emergency lighting shall be provided to an average level of illumination not less than 10 lx at floor or tread level in, (o) universal washrooms, universal shower rooms and accessible change spaces required by Article 3.8.2.3.	https://www.dropbox.c om/s/59imwavxieibbvh /Proposed_Change_155_3. pdf?dl=0	2	I support this proposed change as is with comment(s).	Provide definition for "universal shower" as it is a new term and the minimum requirements are undefined. Clarify where and when a universal shower is required rather than simply an accessible shower.
Accessibility	3.4.6.7. Ramp Slope	(1) Except as required for aisles by Article 3.3.2.4., the maximum slope of a ramp shall be, (a) 1 in 10 in any assembly, care, care and treatment, detention or residential occupancy, (b) 1 in 6 in rooms or floor areas classified as mercantile occupancy or industrial occupancy, (c) 1 in 8 in any other floor area, and (d) 1 in 10 for an exterior ramp.	3.4.6.7. Ramp Slope	(1) Except as provided in Sentence (2) and as provided for aisles in Article 3,3.2.4., ramps shall have a uniform slope along their length and a maximum slope of 1 in 12. (2) Except as provided in Section 3.8., ramps in <i>industrial occupancies</i> shall have a uniform slope along their length and a maximum slope of (a) 1 in 6 for interior ramps, and (b) 1 in 10 for exterior ramps.	(1) Except as requiredprovided in Sentence (2) and as provided for aisles by in Article 3.3.2.4., they amps shall have a uniform slope along their length and a maximum slope of a ramp's hall be, in 12. (a) I in 10 in any assembly, care, care and treatment, detention or residential occupancy; (b) I in 6 in rooms or floor areas classified as mercantile occupancy or industrial occupancy; (c) I in 8 in any other floor area (2) Except as provided in Section 3.8., ramps in industrial occupancies shall have a uniform slope along their length and a maximum slope of (a) I in 6 for interior ramps, and (db) I in 10 for an exterior rampsamps.	https://www.dropbox.c om/s/zc715fa6xnfj9w9 /Proposed_Change_15 03. pdf?dl=0	3	I support this proposed change with modification(s).	State what the permissable tolerances for a "uniform slope" are. See clauses that define uniform rise and run, etc., for stairs. OBC should recognize normal construction tolerances such as for flat floors and apply tolerances to uniformity of slope, both along and perpendicular to the direction of travel, and allow for limited drainage slopes as well.
Subject	Current Ontario Code Subsection/ Article	Current Ontario Code Provision(s)	Proposed National Code Subsection/ Article	Proposed National Code Provision(s)	Proposed Ontario Code Provision(s)	Link to the National PCF	Rank	Status	Comments
ЕМТС	3.1.11.7. Fire Blocks Material	(4) In a <i>building</i> permitted to be of <i>combustible construction</i> , in a <i>combustible</i> roof system permitted by Sentence 3.1.5.3.(2), and in a raised platform permitted by Sentence 3.1.5.8.(2), <i>fire blocks</i> are permitted to be, (a) solid lumber or a structural composite lumber product conforming to ASTM D5456,	3.1.11.7. Fire Blocks Material	(3.1) In a building or part of a building permitted to be of encapsulated mass timber construction, wood nailing elements referred to in Article 3.1.6.11. need not be tested in conformance with Sentence (1). (4) In a building permitted to be of combustible construction, in a combustible roof system permitted by Sentence 3.1.5.3.(2), and in a raised platform permitted by	(3.1) In a building or part of a building permitted to be of encapsulated mass timber construction, wood nailing elements referred to in Article 3.1.6.11. need not be tested in conformance with Sentence (1). (4) In a building permitted to be of combustible construction, in a combustible roof system permitted by Sentence 3.1.5.3.(2), and in a raised platform permitted by	https://www.drop box. com/s/klh637 rv983nm2i/Propo sed_Change_103 6.pdf? dl=0	2	I support this proposed change as is with comment(s).	Why is phenolic bonded plywood singled out and not other types of plywood? Consider removing phenolic bonded plywood throughout the code. We would like to raise a concern with singling out specific products, such as phenolic plywood, that may be comprise of formaldehyde or other harmful resins. The Committee's concern is that singling out products such as phenolic plywood will deter the use of less toxic materials with equivalent performance standards.
		"Evaluation of Structural Composite Lumber Products", not less than 38 mm thick, (b) phenolic bonded plywood, OSB or waferboard not less than 12.5 mm thick with joints supported, or (c) two thicknesses of lumber or a structural composite lumber product conforming to ASTM D5456, "Evaluation of Structural Composite Lumber Products", each not less than 19 mm thick with joints staggered, where the width or height of the concealed space requires more than one piece of lumber or structural composite lumber product not less than 38 mm thick to block off the space.		Sentence 3.1.5.8.(2) and 3.1.6.12.(1), fire blocks are permitted to be, (a) solid lumber or a structural composite lumber product conforming to ASTM D5456, "Evaluation of Structural Composite Lumber Products", not less than 38 mm thick, (b) phenolic bonded plywood, OSB or waferboard not less than 12.5 mm thick with joints supported, or (c) two thicknesses of lumber or a structural composite lumber product conforming to ASTM D5456, "Evaluation of Structural Composite Lumber Products", each not less than 19 mm thick with joints staggered, where the width or height of the concealed space requires more than one piece of lumber or structural composite lumber product not less than 38 mm thick to block off the space.	Sentence 3.1.5.8.(2) and 3.1.6.12.(1), fire blocks are permitted to be, (a) solid lumber or a structural composite lumber product conforming to ASTM D5456, "Evaluation of Structural Composite Lumber Products", not less than 38 mm thick, (b) phenolic bonded plywood, OSB or waferboard not less than 12.5 mm thick with joints supported, or (c) two thicknesses of lumber or a structural composite lumber product conforming to ASTM D5456, "Evaluation of Structural Composite Lumber Products", each not less than 19 mm thick with joints staggered, where the width or height of the concealed space requires more than one piece of lumber or structural composite lumber product not less than 38 mm thick to block off the space.				
Subject	Current Ontario Code Subsection/ Article	Current Ontario Code Provision(s)	Proposed National Code Subsection/ Article	Proposed National Code Provision(s)	Proposed Ontario Code Provision(s)	Link to the National PCF	Rank	Status	Comments

Subject	Current Ontario Code Subsection/ Article	Current Ontario Code Provision(s)	Proposed National Code Subsection/ Article	Proposed National Code Provision(s)	Proposed Ontario Code Provision(s)	Link to the National PCF	Rank	Status	Comments
Penetrations	3.1.9.3. Penetration by Wires, Cables	(1) Optical fibre cables and electrical wires and cables in totally enclosed noncombustible raceways are permitted to penetrate an assembly required to have a fire-resistance rating without being incorporated in the assembly at the time of testing as required by Article 3.1.9.2. (2) Except as permitted by Sentence (3), totally enclosed nonmetallic raceways conforming to Article	3.1.9.3.2. Service- Equipment Penetra tions	raceways, optical fibre cables, electrical wires and cables, and	(1) Optical fibre cables and Ducts, electrical wires and cables in outlet boxes, pipes, totall y enclosed noncombustible raceways are permitted to penetrate an assembly required to have a fire-resistance rating without being incorporated in the assembly at the time of testing as required by Article 3.1.9.2. (2) Except as permitted by Sentence (3), totally enclosed nonmetallic raceways conforming to Article 3.1.5.20.;	sed_Change_149 9.pdf?	3	I support this proposed change with modification(s).	Committee decision on ranking. This caluse pemits outlets boxes, yet the next clause limits the type and size of boxes, as commented by SCOBCAR in 2020. Although the following refers to numbering from NBC Public Consultation of 2020, the essence of the notes may apply: Same of the proposed changes may be helpful they don't resolve the ambiguity and apparent inconsistency between 3.1.9.3. 5) and 3.1.9.4. Several issues arise: 1) Why is 3.1.9.3. 5) still in 3.1.9.3.4.? Why hasn't it been moved to 3.1.9.4. to consolidate the information about outlet boxes? 2) Confusion seems to stem from trying to classify 3 distinct items (non-combustible, combustible, and combustible but fire rated outlet boxes) by using only 2 categories (non-combustible, and combustible outlet boxes limited in area and aggregate area, but combustible ones are not? 4) Why would a fire rated combustible outlet box require a rated fire stop? 5) 3.1.9.4. 3) would seem to override 3.1.9.3. 5) and disallow the use of combustible outlet boxes on opposite sides of a vertical fire separation because of the reference back to 3.1.9.4. 2). This doesn't seem appropriate. 6) A fire rated combustible outlet box would appear to be superior to a non-combustible outlet box in restricting the spread of smoke and flame, yet is prohibited when used on opposite sides of a vertical fire separation. 7) As noted in the justification for Change 1517 "Combustible outlet boxes that are tested and listed for use in fire-resistance rated (FRR) assemblies exist."
		3.1.5.20., optical fibre cables, and electrical wires and cables, single or grouped, with combustible insulation, jackets or sheathes that conform to the requirements of Clause 3.1.5.18.(1)(a) and that are not installed in totally enclosed noncombustible raceways are permitted to penetrate an assembly required to have a fire-resistance rating without being incorporated in the assembly at the time of testing as required by Article 3.1.9.2., provided the overall diameter of the single or grouped wires or cables, or the raceways is not more than 25 mm. (3) Single conductor metal sheathed cables with combustible jacketing that are more than 25 mm. (3) Single conductor metal sheathed cables with combustible jacketing that are more than 25 mm in overall diameter are permitted to penetrate a fire separation required to have a fire-resistance rating without being incorporated in the assembly at the time of testing as required by Article 3.1.9.2., provided the cables are not grouped and are spaced a minimum of 300 mm apart. (4) Combustible totally enclosed raceways that are embedded in a concrete floor slab are permitted in an assembly required to have a fire-resistance rating without being incorporated in the assembly at the time of testing as required by Article 3.1.9.2., provided the concrete cover between the raceway and the bottom of the slab is not less than 50 mm. (5) Combustible electrical outlet boxes are permitted in an assembly required to have a fire-resistance rating without being incorporated in the assembly at the time of testing as required by Article 3.1.9.2., provided the opening through the membrane into the box is not more than 160 cm2.		(2) Combustible totally enclosed raceways that are embedded in a concrete floor slab are permitted in an assembly required to have a fire-resistance rating, provided the concrete cover between the raceway and the bottom of the slab is not less than 50 mm.	and electrical wires and cables, single or grouped, with combustible insulation, jacket sor sheathes that conform to the requirements of Clause 3.1.5.18.(1) (a) and that are not installed in totally enclosed noncombustible raceways are permitted to penetrate and other similar service equipment are permitted to penetrate a fire se paration or a membrane forming part of an assembly required to have a fire-resistance rating without being incorporated in the assembly at the time of testing as required by Article 3.1.9.2., provided the overall diameter of the single or grouped wires or cables, or the raceways is not more than 25 mm. they are protected at the penetration with a firestop conforming to Sentence 3.1.9.1. (1) Single conductor metal sheathed cables with combustible jacketing that are more than 25 mm in overall diameter are permitted to penetrate a fire separation required to have a fire-resistance rating without being incorporated in the assembly at the time of testing as required by Article 3.1.9.2., provided the cables are not grouped and are spaced a min imum of 300 mm apart. (4) Combustible totally enclosed raceways that are embedded in a concrete floor slab are permitted in an assembly required to have a fire-resistance rating without being incorporated in the assembly at the time of testing as required by Article 3.1.9.2., provided the concrete cover between the raceway and the bottom of the slab is not less than 50 mm. (5) Combustible electrical outlet boxes are permitted in an assembly required to have a fire-resistance rating without being incorporated in the assembly at the time of testing as required by Article 3.1.9.2., provided the concrete cover between the raceway and the bottom of the slab is not less than 50 mm. (5) Combustible electrical outlet boxes are permitted in an assembly required to have a fire-resistance rating without being incorporated in the assembly at the time of testing as required by Article 3.1.9.2., provided the opening through the membrane into the box is not mor	lucjhy9v54/Proposed Change 15 15.pdf? dl=0 https://www.dropbox.com/s/yfjd49 ve95nv5cu/Proposed Change 151 7.pdf? dl=0			
Penetrations	3.1.9.3A. Penetration by Outlet Boxes	(1) Except as provided in Sentences (2) and (3), outlet boxes are permitted to penetrate the membrane of an assembly required to have a <i>fire-resistance rating</i> , provided they are sealed at the penetration by a <i>fire stop</i> that has an FT rating not less than the <i>fire- resistance rating</i> of the <i>fire separation</i> when subjected to the fire test method in CAN/ULC-S115, "Fire Tests of Firestop Systems". (2) Except as provided in Sentences 3.1.9.1.(2) and (3), <i>noncombustible</i> outlet boxes that penetrate a vertical <i>fire separation</i> or a membrane forming part of an assembly required to have a <i>fire-resistance rating</i> need not conform to Sentence (1), provided, (a) they do not exceed, (i) 160 cm² in area, and (ii) an aggregate area of 650 cm² in any 9.3 m² of surface area, and		have a <i>fire-resistance rating</i> , provided they are sealed at the penetration by a <i>firestop</i> that has an FT rating not less than the <i>fire-resistance rating</i> of the <i>fire separation</i> when subjected to the fire test method in CAN/ULC-S115, "Standard Method of Fire Tests of Firestop Systems." (2) <i>Combustible</i> outlet boxes are permitted to penetrate the membrane of an assembly required to have a <i>fire-resistance rating</i> , provided they are sealed at the penetration by a <i>firestop</i>	(1) Except as provided in Sentences (2) and Sentences (2), outlet boxes are permitted to penetrate the membrane of an assembly required to have a fire-resistance rating, provided they are sealed at the penetration by a fire stopfirestop that thas an FT rating not less than the fire-resistance rating of the fire separation when subjected to the fire test method in CAN/ULC-S115, "Standard Method of Fire Tests of Firestop Systems"." (2) Combustible outlet boxes are permitted to penetrate the membrane of an assembly required to have a fire-resistance rating, provided they are sealed at the penetration by a firestop that, when subjected to the fire test method in CAN/ULC-S115, "StandardMethodofFire TestsofFirestopSystems," hasanFT rating not less than the fire-resistance rating for the fire separation. (3) Except as provided in Sentences 3.1.9.1.(2) and (3), noncombustible outlet boxes that penetrate a vertical fire separation or a membrane forming part of an assembly		3	I support this proposed change with modification(s).	Refer to comments that relates to 3.1.9.3 above

		(b) the annular space between the membrane and noncombustible electrical outlet boxes does not exceed 3 mm. (3) In addition to the requirements of Sentence (2), outlet boxes on opposite sides of a vertical fire separation having a fireresistance rating shall be separated by, (a) a horizontal distance of not less than 600 mm, or (b) a fire block conforming to Article 3.1.11.7.		required to have a <i>fire-resistance rating</i> need not conform to Sentence (1), provided (a) they do not exceed, (i) 160 cm² in area, and (ii) an aggregate area of 650 cm² in any 9.3 m² of surface area, and (b) the annular space between the membrane and the <i>noncombustible</i> electrical outlet boxes does not exceed 3 mm. (4) Outlet boxes on opposite sides of a vertical <i>fire separation</i> having a <i>fire-resistance rating</i> shall be separated by (a) a horizontal distance of not less than 600 mm, (b) a <i>fire block</i> conforming to Article 3.1.11.7, or (c) a <i>firestop</i> installed on each outlet box that has an FT rating not less than the <i>fire-resistance rating</i> of the <i>fire separation</i> when subjected to the fire test method in CAN/ULC-S115, "Standard Method of Fire Tests of Firestop Systems."	required to have a <i>fire-resistance rating</i> need not conform to Sentence (1), provided, (a) they do not exceed, (i) 160 cm² in area, and (ii) an aggregate area of 650 cm² in any 9.3 m² of surface area, and (b) the annular space between the membrane and the <i>noncombustible</i> electrical outlet boxes does not exceed 3 mm. (3) In addition to the requirements of Sentence (2), outlet (4) Outlet boxes on opposite sides of a vertical <i>fire separation</i> having a <i>fire-resistance rating</i> shall be separated by; (a) a horizontal distance of not less than 600 mm, or (b) a <i>fire block</i> conforming to Article 3.1.11.7., or (c) a <i>firestop</i> installed on each outlet box that has an FT rating not less than the <i>fire-resistance rating</i> of the <i>fire separation</i> when subjected to the fire test method in CAN/ULC-S115, "StandardMethodof Fire Tests of Firestop Systems."			#N/A	
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Subject	Current Ontario Code Subsection/ Article	Current Ontario Code Provision(s)	Proposed National Code Subsection/ Article	Proposed National Code Provision(s)	Proposed Ontario Code Provision(s)	Link to the National PCF	Rank	Status	Comments
Fire Alarm and Detection System	3.2.4.1. Determination of Requirement for a Fire Alarm System	(3) If each dwelling unit has direct access to an exterior exit facility leading to ground level, a fire alarm system is not required in an apartment building, (a) in which not more than four dwelling units share a common means of egress, or (b) that is not more than 3 storeys in building height. (4) A fire alarm system is not required in a hotel 3 storeys or less in building height provided each suite has direct access to an exterior exit facility leading to ground level.	3.2.4.1. Determination of Requirement for a Fire Alarm System	(3) A fire alarm system is not required in a residential occupancy that is not sprinklered, where (a) not more than 4 suites share a common means of egress, or (b) each suite has direct access to an exterior exit facility leading to ground level.	(3) If each dwelling unit has direct access to an exterior exit facility leading to groun d level, a fire alarm system is not required in an apartment building; (a) in which not more than four dwelling units share aeommon means of egress, or (b) that is not more than 3 storeys in building height. (4 (2) A fire alarm system is not required in a hotel 3 storeys or less in building height provided residential occupancy that is not sprinkler ed, where (a) not more than 4 suites share a common means of egress, or (b) each suite has direct access to an exterior exit facility leading to ground level.	https://www.drop.box. com/s/2f35z5 g85z8h4z3/Propo sed_Change_134.5.pdf? dl=0	3	I support this proposed change with modification(s).	(3) A fire alarm system is not required in a residential occupancy where (a) not more than 4 suites share a common means of egress, or (b) each suite has direct access to an exterior exit facility leading to ground level , and (c) each suite is completely segregated from the remainder of the building, with no suite above another suite.
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Fire Protection Systems	3.2.5.12. Automatic Sprinkler	(3) Except as required by Sentence (9), NFPA 13D, "Installation of Sprinkler Systems in One- and Two- Family	3.2.5.12. Automatic Sprinkler Systems	(3) Instead of the requirements of Sentence (1), NFPA 13D, "Standard for the Installation of Sprinkler Systems in One- and Two-Family Dwellings and Manufactured Homes," is permitted	(3) Except as required by Instead of the requirements of Sentence (91), NFPA 13D, "Standard for the Installation of Sprinkler Systems in One- and Two-	https://www.drop box. com/s/mb0m 4mht7wq9d50/Pr	3	I support this proposed change with modification(s).	Cannot refute this change due to the increase in life safety, but it may add a disproportionately large cost to this type of building. If the pupose is to substute a less onreous NFPA sprinkler standard for small
	Systems	Dwellings and Manufactured Homes", is permitted to be used for the design, construction, installation and testing of an automatic sprinkler system installed in a building of residential occupancy that contains not more than two dwelling units.	1	to be used for the design, construction and installation of an automatic sprinkler system installed (a) in a building of residential occupancy throughout that contains not more than 2 dwelling units, (b) in a building of residential occupancy throughout that contains more than 2 dwelling units, provided (i) except for a secondary suite, no dwelling unit is located above another dwelling unit, (ii) all suites are separated by a vertical fire separation having a fire-resistance rating of not less than 1 h that provides continuous protection from the top of the footing to the underside of the roof deck, with any space between the top of the wall and the roof deck tightly filled with mineral wool or noncombustible material, (iii) each dwelling unit has its own sprinkler water supply provided in accordance with NFPA 13D, "Standard for the Installation of Sprinkler Systems in One- and Two-Family Dwellings and Manufactured Homes," (iv) a passive purge sprinkler system design is used as described in NFPA 13D, "Standard for the installation of Sprinkler Systems in One- and Two-Family Dwellings and Manufactured Homes," and (v) where the sprinkler system is taken into consideration for the reduction of limiting distance, all rooms, including closets, bathrooms and attached garages, that adjoin an exposing building face are sprinklered, notwithstanding any exemption stated in NFPA 13D, "Standard	(ii) all suites are separated by a vertical fire separation having a fire-resistance rating of not less than 1 h that provides continuous protection from the top of the footing to the underside of the roof deck, with any space between the top of the wall and the roof deck tightly filled with mineral wool or noncombustible material, (iii) each dwelling unit has its own sprinkler water supply provided in accordance with NFPA 13D, "Standard for the Installation of Sprinkler Systems in One- and Two-Family Dwellings and Manufactured Homes," (iv) a passive purge sprinkler system design is used as described in NFPA 13D, "Standard for the installation of Sprinkler Systems in One- and Two-Family Dwellings and Manufactured Homes," and (v) where the sprinkler system is taken into consideration for the reduction of limiting distance, all rooms, including closets, bathrooms and attached garages, that adjoin	oposed Change 539.pdf? dl=0 https://www.drop.box. com/s/tho6dh. vkvxlma4d/Propo. sed Change 128.4.pdf? dl=0			residential buildings where a sprinkler system is installed, please clarify. Suggest deleting the word THROUGHOUT in reference to the Occupancy, as typically a garage is included in these building typologies and could be an F (3) issue. (a) in a building of residential occupancy throughout that contains not more than two 2 dwelling units., (b) in a building of residential occupancy-throughout that contains more than 2 dwelling units, provided

Fire Protection Systems	3.2.8.2. Exceptions to Special Protection	(5) Except as permitted by Sentence (6), openings for stairways, escalators and inclined moving walks need 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 does not exceed 10 m2, (b) the building is sprinklered throughout, and (c) the interconnected floor space contains only Group A, Division 1, 2 or 3, Group D or Group E occupancies.	, 3.2.8.2. Exceptions to Special Protection	(a) the opening for each escalator or walk does not exceed 10 m2, (b) the building is sprinklered throughout, (c) closely spaced sprinklers and associateddraft stops are installed around the openings in conformance with NFPA 13, "Standard for the Installation of Sprinkler Systems," and (d) the interconnected floor space contains only Group A,	stairways, escalators and inclined moving walks need not conform to the requirement s in Articles 3.2.8.3. to 3.2.8.118. provided, (a) the opening for each stairway, escalator or walk does not exceed 10 m2; (b) the building is sprinklered throughout, (c) closely spaced sprinklers and associateddraft stops are installed around the openings in conformance withNFPA13, "Standard for the Installation of Sprinkler Systems," and (ed) the interconnected floor space contains only Group A, Division 1, 2 or 3, Group-	https://www.drop box. com/s/mb0m 4mht/3wq9d50/Pr_ oposed_Change_539.pdf? dl=0	3	I support this proposed change with modification(s).	Stairways should not be removed from this exclusion. The proposed change and justification indicate stairways were always part of this exclusion historically and no justification has been given to remove them.
Fire Protection Systems	3.2.8.3. Configuration Sprinklers (New)	N/A	3.2.8.3. Sprinklers	Division 1, 2 or 3, Group D or Group E major occupancies. (1) A building containing an interconnected floor space shall be sprinklered throughout. (2) Except for large floor openings as defined in NFPA 13, "Standard for the Installation of Sprinkler Systems," closely spaced sprinklers and associated draft stops shall be installed around floor openings in conformance with NFPA 13.	Dor Group E major occupancies: (1) A building containing an interconnected floor space shall be sprinklered throughout. (2) Except for large floor openings as defined in NFPA 13, "Standard for the Installation of Sprinkler Systems," closely spaced sprinklers and associated draft stops shall be installed around floor openings in conformance with NFPA 13.	https://www.drop box. com/s/mb0m 4mht7wq9d50/Pr_ oposed_Change_539.pdf? dl=0	4		d (1) If the purpose of this is to change the requirement for sprinklers in a building that has an interconnected floor space to be required for the entire building in lieu of what is prescribed in 3.2.8.7.(1) then it should be reviewed separately, and 3.2.8.7.(1) should be deleted. This increases the sprinklering requirement from the storeys with the interconnected floor space and storeys below to ALL storerys. This does not appear to be the intent of PCF 539. (2) This appears to eliminate the OBC minimum size requirement for an unprotected opening, (except as described in 3.2.8.2) but openings less than 93 m2 (per NFPA 23) will require closely spaced sprinklers and draft stops. OBC currently allows openings between 65 m2 and 93 m2 without closely spaced sprinklers and draft stops. Is change the intent of this sentence? It is not described in PCF 539.
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Safety Glazing	3.1.8.14. Wired Glass and Glass Block	(1) Except as permitted by Articles 3.1.8.16. and 3.1.8.17. for the separation of <i>exits</i> , an opening in a <i>fire separation</i> having a <i>fire-resistance rating</i> not more than 1 h is permitted to be protected with fixed wired glass assemblies or glass blocks installed in conformance with NFPA 80, "Fire Doors and Other Opening Protectives".	3.1.8.16. Wired Glass and Glass Block	(1) Except as permitted by Articles 3.1.8.18. and 3.1.8.19. for the separation of exits, an opening in a fire separation having a fire-resistance rating not more than 1 h is permitted to be protected with fixed wired glass assemblies or glass blocks installed in conformance with NFPA 80, "Standard for Fire Doors and Other Opening Protectives."	(1) Except as permitted by Articles 3.1.8.1618. and 3.1.8.1719. for the separation of exits, an opening in a fire separation having a fire resistance rating not more than 1 h is permitted to be protected with fixed wired glas a assemblies or glass blocks installed in conformance with NFPA 80, "Standard for Fire Doors and Other Opening Protectives".	https://www.drop box. com/s/23czta z4vdfaq2y/Propos cd_Change_1444.pdf?dl=0	3	I support this proposed change with modification(s).	The OAA recommends removing the use of wired glass throughout the code. Other products perform at least as well without exposing occupants and first responders to from exposed jagged wires.
Safety Glazing	3.1.8.16. Area Limits for Wired Glass and Glass Block	(1) Except as permitted by Article 3.1.8.17., the maximum area of wired glass in a door used in the locations shown in Table 3.1.8.15. shall conform to the Table. (2) Except as permitted by Article 3.1.8.17., the maximum area of glass block and wired glass panels not in a door, used in the locations shown in Table 3.1.8.15., shall conform to the Table.	Limits for Wired Glass, Glass	(1) Except as permitted by Article 3.1.8.17., the maximum aggregate area of wired glass or safety glazing in a door used in the locations shown in Table 3.1.8.15. shall conform to the Table. (2) Except as permitted by Article 3.1.8.17., the maximum aggregate area of glass block, wired glass or safety glazing panels not in a door used in the locations shown in Table 3.1.8.15. shall conform to the Table.	(1) Except as permitted by Article 3.1.8.17., the maximum <u>aggregate</u> area of wired glass <u>or safety glazing</u> in a door used in the locations shown in Table 3.1.8.15. shall conform to the Table. (2) Except as permitted by Article 3.1.8.17., the maximum <u>aggregate</u> area of glass block and, wired glass <u>or safety glazing panels not in a door, used in the locations shown in Table 3.1.8.15., shall conform to the Table.</u>	https://www.drop box. com/s/23czta z4vdfaq2y/Propos ed_Change_1444.pdf?dl=0	3	I support this proposed change with modification(s).	The OAA recommends removing the use of wired glass throughout the code. Other products perform at least as well without exposing occupants and first responders to from exposed jagged wires.
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Subject	Current Ontario Code Subsection/ Article	Current Ontario Code Provision(s)	Proposed National Code Subsection/ Article	Proposed National Code Provision(s)	Proposed Ontario Code Provision(s)	Link to the National PCF	Rank	Status	Comments
Subject	Current Ontario Code Subsection/ Article	Current Ontario Code Provision(s)	Current National Code Subsection/ Article	Current National Code Provision(s)	Proposed Changes to the Code Provision(s)	Note	Rank	Status	Comments

Number and Location of Exits from Floor Areas	3.4.2.2. Mezzanine Exiting	N/A	3.4.2.2. Means of Egress from Mezzanines	(2) The means of egress from a mezzanine need not conform to Sentence (1), provided (a) the mezzanine is not required to terminate at a vertical fire separation, as permitted in Sentence 3.2.8.2.(1), (b) the occupant load of the mezzanine is not more than 60, (c) the area of the mezzanine does not exceed the area limits stated in Table 3.4.2.2., and (d) the distance limits stated in Table 3.4.2.2. measured along the path of travel are not exceeded from any point on the mezzanine to (i) an egress door serving the space that the mezzanine overlooks, if the space is served by a single egress door, or (ii) the egress stairway leading to an access to exit in the space below if that space is required to be served by 2 or more egress doorways in conformance with Sentence 3.3.1.5.(1).	conform to Sentence (1), provided (a) the mezzanine is not required to terminate at a vertical fire separation, as permitted in Sentence 3.2.8.2.(1), (b) the occupant load of the mezzanine is not more than 60, (c) the area of the mezzanine does not exceed the area limits stated in Table 3.4.2.2, and (d) the distance limits stated in Table 3.4.2.2. measured along the path of travel are not exceeded from any point on the mezzanine to (i) an egress door serving the space that the mezzanine overlooks, if the space is served by a single egress door, or (ii) the egress stairway leading to an access to exit	Remaining item from Phase 1 of the Consultation	4		Proposed sentence (2.1) references to Table 3.4.2.2, but the table is not in current OBC, and is not added as a proposed change. The egress requirements from mezzanines are already covered by Sentence 3.3.1.5.(3)(4)(5) - and are substantially as per the proposed Sentence (2.1). The intent here seems to be requiring Mezzanines to have the same exit requirement as floor areas, which could be a major issue for a Mezzanine that is not adjacent to an exterior wall. Please clarify.
Number and Location of Exits from Floor Areas	3.4.2.2. Mezzanine Exiting	N/A	3.4.2.2. Means of Egress from Mezzanines	(3) At least half of the required <i>means of egress</i> from a <i>mezzanine</i> shall comply with Sentence (1) if the <i>mezzanine</i> is not required to terminate at a <i>fire separation</i> as permitted by Sentence 3.2.8.2.(1).	(3.1) At least half of the required means of egress from a mezzanine shall comply with Sentence (1) if the mezzanine is not required to terminate at a fire separation as permitted by Sentence 3.2.8.2.(1).	Remaining item from Phase 1 of the Consultation	4		We can sumise from this Sentence that at least 2 egresses are required and I that this Sentence will require at least one egress to be constructed as an exit - same issue as above.
High Buildings	3.1.13.7. High Buildings	N/A	3.1.13.7. High Buildings	(4) A door serving an exit stairway, a vestibule to an exit stairway, a lobby described in Sentence 3.4.4.2.(2), or a corridor not within a suite need not conform to the flame-spread rating and smoke developed classification requirements of Sentence (1) provided (a) it has a flame-spread rating not more than 200, (b) it has a smoke developed classification not more than 300, and (c) the aggregate area of all doors is not more than 10% of the area of the wall in which they are located.	(4.1) A door serving an <i>exit</i> stairway, a vestibule to an <i>exit</i> stairway, a lobby described in Sentence 3.4.4.2.(2), or a corridor not within a <i>suite</i> need not conform to the <i>flame-spread rating</i> and smoke developed classification requirements of Sentence (1) provided (a) it has a <i>flame-spread rating</i> not more than 200, (b) it has a smoke developed classification not more than 300, and (c) the aggregate area of all doors is not more than 10% of the area of the wall in which they are located.	Remaining item from Phase 1 of the Consultation	2	I support this proposed change as is with comment(s)	Support the change, but what will happen to current OBC provisions (4) to (7) related to plumbing fixtures? The referenced Sentence is (4.1), so presumably the remainder of the Sentences remain as is.
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Subject	Current Ontario Code Subsection / Article	Current Ontario Code Provision(s)	Proposed National Code Subsection /Article	Proposed National Code Provision(s)	Proposed Ontario Code Provision(s)	Link(s) to National the PCF (s)	Rank	Status	Comments
Importance Categories	4.1.2.1. Loads and Effects	(Table 4.1.2.1.B. Importance Categories for Buildings)	4.1.2.1. Loads and Effects	(Table 4.1.2.1. Importance Categories for Buildings)	(Refer to the National PCF for the changes in the tables)	https://www.dropbox.c om/s/16dgix1tl6ezq8j/ Proposed Change.pdf? dl=0	3	I support this proposed change with modification(s).	The revised NBC table is going to create confusion between architects, CBOs and other authorities having jurisdiction. The NBC proposes to delete the specific list and leave it generic TBD. See dropbox for final NBC revision.
								<u> </u>	
Subject	Current Ontario Code Subsection / Article	Current Ontario Code Provision(s)	Proposed National Code Subsection /Article	Proposed National Code Provision(s)	Proposed Ontario Code Provision(s)	Link to the National PCF	Rank	Status	Comments
Air Leakage	5.4.1.1. Required Resistance to Air Leakage	(1) 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 appropriate conditions for the intended use of the building, (c) minimize the accumulation of condensation in and penetration of precipitation into the building component or assembly, (d) control heat transfer to roofs where ice damming can occur, and (e) not compromise the operation of building services. (2) Except as provided in Sentence (3), an air barrier system shall be installed to provide the principal resistance to air leakage. (3) An air barrier system is not required where it can be shown that uncontrolled air leakage will not adversely affect any of, (a) the health or safety of building users, (b) the intended use of the building, or (c) the operation of building services.	Required Resistance to Air Leakage	(1) 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 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 and other soil gases from the ground with an aim to controlling the indoor radon concentrations of these gases to an acceptable level, and (f) not compromise the operation of building services. (2) Except as provided in Sentence (7), an air barrier system shall be designed and constructed to provide the principal resistance to air leakage to meet the requirements of Sentence (1). (3) The air barrier system shall incorporate air barrier assemblies that meet the appropriate Performance Class as defined in Table 5.4.1.1. (4) The air barrier system shall be designed and constructed to be continuous	(1) 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 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 and other soil gases from the ground with an aim to the feed to the indoor radon concentrations of these gases to an acceptable level, and (f) not compromise the operation of building services. (2) Except as provided in Sentence (37), an air barrier system shall be installed designed and constructed to provide the principal resistance to air leakage, to meet the requirements of Sentence (1). (3) The air barrier system shall incorporate air barrier assemblies that meet the appropriate Performance Class as defined in Table 5.4.1.1. (4) The air barrier system shall be designed and constructed to be continuous	t.	3	I support this proposed change with modification(s).	This is fundamentally correct but is virtually impossible to do with sealing and barriers alone. If the building is not tested for radon after construction you have no idea if the mitigation measures were effective. Current building science indicates that for radon control, foundation sealing is more about increasing efficacy of the active soil depressurization system as opposed to trying to seal radon out. Such a system to assess post-construction radon does not exist. It is not possible to predict indoor radon levels pre- construction. Important to note that the lion's share of radon entry is mass transport and not diffusion through the barrier or sealant.

Air Leakage	5.4.1.2. Air Barrier System Properties	(1) Except as provided in Sentence (2), materials intended to provide the principal resistance to air leakage shall, (a) have an air leakage characteristic not greater than 0.02 L/(s•m²) measured at an air pressure difference of 75 Pa when tested in accordance with ASTM E2178, "Air Permeance of Building Materials", or	5.4.1.2. Air Barrier Assemblies	(a) across construction, control and expansion joints, (b) across junctions between different building air barrier assemblies, and (c) around penetrations through air barrier assemblies. (5) The structural design of air barrier assemblies, including junctions between air barrier assemblies, subject to air pressure loads shall comply with Article 5.1.4.1. and Subsection 5.2.2. (6) The maximum air leakage rates specified in Table 5.4.1.1. are permitted to be increased where it can be shown that the higher rate will not adversely affect any of (a) the health or safety of the building, or (c) the operation of building services. (7) An air barrier system is not required where it can be shown that uncontrolled air leakage will not adversely affect any of (a) the health or safety of building users, (b) the intended use of the building, or (c) the operation of building services. (Table 5.4.1.1 Maximum Air Leakage Rates for Air Barrier Assemblies) (1) Except as provided in Sentences (2) and (3), air barrier assemblies not in contact with the ground shall conform with CAN/ULC-S742, "Air Barrier Assemblies – Specification" and meet the selected Performance Class of Table 5.4.1.1. (2) Air barrier assemblies not evaluated in accordance with	(a) across construction, control and expansion joints, (b) across junctions between different building air barrier assemblies, and (c) around penetrations through air barrier assemblies. (5) The structural design of air barrier assemblies, including junctions between air barrier assemblies, including junctions between air barrier assemblies, subject to air pressure loads shall comply with Article 5.1.4.1. and Subsection 5.2.2. (6) The maximum air leakage rates specified in Table 5.4.1.1. are permitted to be increased where it can be shown that the higher rate will not adversely affect any of (a) the health or safety of the building users, (b) the intended use of the building, or (c) the operation of building services. 3 (7) An air barrier system is not required where it can be shown that uncontrolled air leakage will not adversely affect any of, (a) the health or safety of building users, (b) the intended use of the building, or (c) the operation of building services. (See the National pcf for Table 5.4.1.1 Maximum Air Leakage Rates for Air Barrier Assemblies) (1) Except as provided in Sentence Sentences (2), materials) and (3), air barrier assemblies not in contact with the ground shall conform with CAN/ULC- S742. "Air Barrier Assemblies — Specification" and meet the selected Performance Class of Table 5.4.1.1. (2) Air barrier assemblies not evaluated in accordance with CAN/ULC-S742,	https://www.dropbox.e om/s/i4shkfql54rlj8g/Pr oposed Change 1335. pdf?dl=0	3	I support this proposed change with modification(s).	(4) Below-grade air barrier assemblies in contact with the ground shall minimize the ingress of airborne radon and other soil gases. This Clause should be vetted for implications of requireing Radom mitigation in ALL buildings. Reference should be made to SB-9 and SB-9 should be enhanced to provide more definitive direction as to the actual mitigation
		(b) conform to CAN/ULC-S741, "Air Barrier Materials – Specification". (2) The air leakage limit specified in Sentence (1) is permitted to be increased where it can be shown that the higher rate of leakage will not adversely affect any of, (a) the health or safety of building users, (b) the intended use of the building, or		CAN/ULC-S742, "Air Barrier Assemblies - Specification," shall be designed and constructed (a) to meet or exceed the selected Performance Class of Table 5.4.1.1., and (b) with at least one air barrier material intended to provide the primary resistance to air leakage that meets the requirements of CAN/ULC-S741, "Air Barrier Materials – Specification."	"AirBarrier Assemblies - Specification," shall be designed and constructed (a) to meet or exceed the selected Performance Class of Table 5.4.1.1., and (b) with at least one air barrier material intended to provide the principal primary resistance to air leakage shall, (a) have an air leakage characteristic not greater than 0.02L/(s+m2) measured at an air				design requiremets.
		(c) the operation of <i>building</i> services. (3) The <i>air barrier system</i> shall be continuous, (a) across construction, control and expansion joints, (b) across junctions between different <i>building</i> assemblies, and (c) around penetrations through the <i>building</i> assembly. (4) The structural design of <i>air barrier systems</i> installed in assemblies subject to air pressure loads shall comply with Article 5.1.4.1. and Subsection 5.2.2.		(3) Air barrier assemblies covered in Subsections 5.9.2., 5.9.3. and 5.9.4. shall meet the air barrier performance criteria defined in those Subsections. (4) Below-grade air barrier assemblies in contact with the ground shall minimize the ingress of airborne radon and other soil gases.	pressure difference of 75 Pa when tested in accordance with ASTM E2178, "Air Permeance of Building Materials", or (b) conform tothat meets the requirements of CAN/ULC-S741, "Air Barrier Materials – Specification"" (2) The air leakage limit specified in Sentence (1) is permitted to be increased where it can be shown that the higher rate of leakage will not adversely affect any of, (a) the health or safety of building users, (b) the intended use of the building, or (c) the operation of building services. (3) The (3) Air barrier assemblies covered in Subsections 5.9.25.9.3. and 5.9.4. shall meet the air barrier performance criteria defined in those Subsections. (4) Below-grade air barrier system shall be continuous, (a) across construction, control and expansion joints, (b) across junctions between different building assemblies, and (c) around penetrations through in contact with the building assembly. ground shall minimize the ingress of airborne (4) The structural design of air barrier systems installed in assemblies radon and other soil gases. subject to air pressure loads shall comply with Article 5.1.4.1. and Subsection 5.2.2.				
Environmental Separation Table 5.9.1.1	5.10.1.1. Compliance with Applicable Standards	(Table 5.10.1.1 Standards Applicable to Environmental Separators and Assemblies Exposed to the Exterior)	Table 5.9.1.1.	(Table 5.9.1.1 Standards Applicable to Environmental Separators and Assemblies Exposed to the Exterior)	(See the National PCF's for the proposed changes to the table)	https://www.dropbox.com/s/wjyqup8z8ycv1on/Proposed_Change_11 33.pdf?dl=0https://www.dropbox.com/s/1pn4kyv3m447oh3/Proposed_Change_11 34.pdf?dl=0https://www.dropbox.com/s/r6nqluksqllr4ht/Proposed_Change_1259.pdf?dl=0https://www.dropbox.com/s/r6nqluksqllr4ht/Proposed_Change_1259.pdf?dl=0https://www.dropbox.com/s/u7faq56b8s5kqxr/	3	I support this proposed change with modification(s).	Table should be included directly in the OBC rather than being a reference to an external document.

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Subject	Current Ontario Code Subsection / Article	Current Ontario Code Provision(s)	Proposed National Code Subsection /Article	Proposed National Code Provision(s)	Proposed Ontario Code Provision(s)	Link to the National PCF	Rank	Status	Comments
Good Engineering Practice	6.2.1. General	(1) Heating, ventilating and air-conditioning systems, including related mechanical refrigeration systems, shall be designed, constructed and installed to conform to good engineering practice appropriate to the circumstances such as described in, (a) the ASHRAE Handbooks as follows: (i) Fundamentals, (ii) Refrigeration, (iii) HVAC Applications, (iv) HVAC Systems and Equipment, and (v) ANSI/ASHRAE/IESNA 90.1, "Energy Standard for Buildings Except Low-Rise Residential Buildings", (b) CSA F280, "Determining the Required Capacity of Residential Space Heating and Cooling Appliances", and the outside winter design temperatures shall conform to MMAH Supplementary Standard SB-1, "Climatic and Seismic Data", (c) CAN/CSA-F326-M, "Residential Mechanical Ventilation Systems", (d) the NFPA Fire Codes, (e) the HRAI Digest, (f) the Hydronics Institute Manuals, (g) the SMACNA Manuals, (h) ACGIH, "Industrial Ventilation Manual", (i) CAN/CSA-Z317.2, "Special Requirements for Heating, Ventilation, and Air Conditioning (HVAC) Systems in Health Care Facilities", (i) reserved.	6.2.1. General	mechanical refrigeration equipment, shall be designed,	(1) Heating, ventilating and air-conditioning systems, including related mechanical refrigeration systemsequipment, shall be designed, constructed and installed to conform to in conformance with good engineering practice appropriate to the circumstances such as that described in, but not limited to. (a) the ASHRAE Handbooks and Standardsas follows: (i) Fundamentals, (ii) Refrigeration, (iii) HVAC Applications, (iv) HVAC Systems Equipment, and, (v) ANSI/ASHRAE/IESNA90-1, "Energy Standard for Buildings Except Low-Rise Residential Buildings", (b) CSA F280, "Determining the Required Capacity of Residential Space Heating and Cooling Appliances", and the outside winter design temperatures shall conform to MMAH Supplementary Standard SB-1, "Climatic and Seismic Data", (c) CAN/CSA-F326-M, "Residential Mechanical Ventilation Systems", (d) the NFPA Standards, (g) the SMACNA Manuals, (f) ACGIH, "Industrial Ventilation: A Manual", of Recommended Practice for Design." (g) CSA B214, "Installation code for hydronic heating systems," (h) CAN/CSA-Z317.2, "Special Requirements for Heating, Ventilation, and Air Conditioning (HVAC) Systems in Health Care Facilities",	https://www.dropbox.c om/s/zzyyz903vm86z3 i/Proposed_Change_12_70. pdf?dl=0	3	I support this proposed change with modification(s).	Relying on HVAC alone to control radon is a gamble and if it does not work is a very costly mistake It also competes with green energy conservation initiatives. EPA document EPA 625/R-92/016, "Radon Prevention in the Design and Construction of Schools and Other Large Buildings," is old. It works but does not address new science and techniques used as industry best practice. Consider referencing ANSI/AARST CC-1000 2017 "Soil Gas Control Systems In New Construction of Buildings"
		(k) CCBFC NRCC 56191, "National Energy Code of Canada for Buildings", and (1) EPA/625/R-92/016, "Radon Prevention in the Design and Construction of Schools and Other Large Buildings".			(ib) the HRA1 Digest, (j) ASHRAE Guideline 12, "Minimizing the Risk of Legionellosis Associated with Building Water Systems". (k) CCBFC NRCC 56191, "National Energy Code of Canada for Buildings", and (l) EPA/625/R-92/016, "Radon Prevention in the Design and Construction of Schools and Other Large Buildings". (me) the Hydronics Institute Manuals,				
Air Duct System	6.2.4.11. Exhaus t Ducts and Outlets	(1) Where an exhaust duct passes through or is adjacent to unheated space, the duct shall be insulated to prevent moisture or condensation in the duct. (2) Exhaust outlets shall be designed to prevent back draft under wind conditions. (3) Exhaust ducts directly connected to laundry drying equipment shall be independent of other exhaust ducts. (4) Exhaust systems shall discharge directly to the outdoors.	6.3.2.10. Exhaust Ducts and Outlets	(8) Where collective venting of multiple installations of laundry-drying equipment is used, the ventilation system shall (a) be connected to a common <i>exhaust duct</i> that is vented by one central exhaust fan, (b) include an interlock to activate the central exhaust fan when laundry-drying equipment is in use, and (c) be provided with make-up air.	(18) Where an exhaust duct passes through or is adjacent to unheated space, the duct shall be insulated to prevent moisture or condens ation in the duct. (2) Exhaust outlets shall be designed to prevent back draft under wind conditions. (3) Exhaust ducts directly connected to collective venting of multiple installations of laundry drying equipment shall be independent of other exhaust ducts. (4) Exhaust systemsystem shall discharge directly (a) be connected to a common exhaust duct that is vented by one central exhaust fan, (b) include an interlock to activate the outdoorscentral exhaust fan when laundry drying equipment is in use, and (c) be provided with make-up air.	https://www.dropbox.c om/s/7hrj5jp21z31ssv/ Proposed_Change_109_6, pdf?dl=0	4	I do not support this propose change for the reason(s) state to the right.	d 6.3.2.8. (18) addresses shared drying equipment, not 6.3.2.10

	Subject	Current Ontario Code Subsection / Article	Current National Current Ontario Code Provision(s) Code Subsection /Article	Current National Code Provision(s)	Proposed Changes to the Code Provision(s)	Note	Rank	Status	Comments
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Subject Referenced Documents	Referenced Documents	Current Ontario Code Provision(s) (1) Where documents are referenced in this Code, they shall be in the editions designated in Column 2 of Table 1.3.1.2.	Referenced Documents	Proposed National Code Provision(s) (1) Where documents are referenced in this Code, they shall be the editions designated in Column 2 of Table 1.3.1.2.	Proposed Ontario Code Provision(s) (Refer to the National PCF for the changes in the tables)	Link to the National PCF https://www.dropbox.com/s/cvk5iq5ii6yzt7c/Proposed_Change_1640.	Rank	Status I support this proposed change with modification(s).	Comments Needs to be updated with the table or its contents included directly in the OBC.
Piping	1.3.1.2. Applicable Editions 7.2.5.1. Fibrocement Pipe and Fittings (new)	Reserved	1.3.1.2. Applicable Editions 2.2.5.1. Fibrocement Pipe and Fittings	(1) Fibrocement pipe and fittings for use in a drain, waste or vent system shall conform to CAN/CSA-B127.3, "Fibrocement drain, waste, and vent pipe and pipe fittings".	(1) Fibrocement pipe and fittings for use in a drain, waste or vent system shall conform to CAN/CSA-B127. 3. "Fibrocement drain, waste, and vent pipe and pipe fittings".	pdf?dl=0 https://www.dropbox.c om/s/natccbdemb1648/ Proposed_Change_147_1 pdf?dl=0	3	I support this proposed change with modification(s).	Needs coordination with the addition of new Standard: CAN/CSA-B127.3, "Fibrocement drain, waste, and vent pipe and pipe fittings".
Piping and Transfer Systems	7.2.5.16. Polyethylene of Raised Temperature Tube and Fittings (New)	N/A	2.2.5.15. Polyethylene of Raised Temperature Tube and Fittings	(1) Polyethylene of raised temperature (PE-RT) tube and manufacturer-approved fittings used in hot and cold <i>potable water systems</i> shall be certified to CSA B137.18, "Polyethylene of raised temperature resistance (PE-RT) tubing systems for pressure applications". (2) The use of PE-RT tube shall conform to Table 7.2.5.16.	(1) Polyethylene of raised temperature (PE-RT) tube and manufacturer-approved fittings used in hot and cold <i>potable water systems</i> shall be certified to CSA B137. 18, "Polyethylene of raised temperature resistance (PE-RT) tubing systems for pressure applications". (2) The use of PE-RT tube shall conform to Table 7.2.5.16.	https://www.dropbox.c om/s/ztxuh76ccgrxdnp/ Proposed Change 100 7. pdf?dl=0	3	I support this proposed change with modification(s).	Needs to be updated with table included directly in the OBC.
Piping and Transfer Systems	7.4.4.4. Neutralizing and Dilution Tanks	(1) Where a <i>fixture</i> or equipment discharges corrosive or acid waste, it shall discharge into a neutralizing or diluting tank that is connected to the <i>sanitary drainage system</i> through, (a) a <i>trap</i> , or (b) <i>indirect connection</i> .	2.4.4.4. Neutralizing and Dilution Tanks	(1) Where a <i>fixture</i> or equipment discharges corrosive or acid waste, it shall discharge into a neutralizing or diluting tank that is connected to the <i>sanitary drainage system</i> through, (a) a <i>trap</i> , or (b) <i>indirect connection</i> .	(1) Where a fixture or equipment discharges corrosive or acid waste, it shall discharge into a neutralizing or diluting tank that is connected to the sanitary drainage system through, (a) a trap, or (b) indirect connection.	https://www.dropbox.c om/s/rz2q4hfo6a5b7wc /Proposed Change_100_9. pdf?dl=0	4	I do not support this proposed change for the reason(s) states to the right.	Not sure what the change or its intent is.
Water-Use Efficiency	7.7.4.2. Non- Potable Rainwater Harvesting Systems (new)	N/A	2.7.2.1. General 2.7.2.3. Roof Design	(1) For the purposes of this Subsection, rainwater shall mean storm sewage runoff that is collected from a roof or the ground, but not from accessible patios and driveways. (2) For the purposes of this Subsection, a non-potable rainwater harvesting system shall mean a storage tank, a pump, pipes, fittings and other plumbing appurtenances used to collect and distribute rainwater, but shall not include a rain barrel not connected to a plumbing system. (3) Roofing components and conveyance systems in contact with rainwater that is supplied to a non-potable rainwater harvesting system shall be constructed of materials that will not introduce substances into the rainwater that could adversely affect its intended end use.	a roof or the ground, but not from accessible patios and driveways. (2) For the purposes of this Subsection, a non-potable rainwater harvesting system shall mean a storage tank, a pump, pipes, fittings and other plumbing appurtenances used to collect and distribute rainwater, but shall not include a rain barrel not connected to a plumbing system. (3) Roofing components and conveyance systems in	https://www.dropbox.c om/s/ljngorcp616avgr/ Proposed Change 940. pdf?dl=0 https://www.dropbox.c om/s/khb9tng8fcco6tq/ Proposed Change 945. pdf?dl=0	3	I support this proposed change with modification(s).	Delete "but not from accessible patios and driveways." or provide adequate justification for excluding these areas from non-potable water systems. Need to retain ability to use accessible roofs, patios and driveways for site design.

Subject	Current Ontario Code Subsection /Article	Current Ontario Code Provision(s)	Proposed National Code Subsection /Article	Proposed National Code Provision(s)	Proposed Ontario Code Provision(s)	Link(s) to the National PCF(s)
Occupancies	9.10.2.1. Occupancy Classification		9.10.2.1. Occupancy Classification	(Table 9.10.2.1 Occupancy Classifications)	(Refer to the National PCF for changes to the tables).	https://www.dropbox.c om/s/qdbc0papkx3z9ls /Proposed_Change_13 20. pdf?dl=0

Rank	Status	Comments
3	I support this proposed change with modification(s).	See following line note

Iome-Type Care	9.10.2.2. Home-		(1) Children's custodial homes and convalescent homes for	(1) Children's custodial homes and convalescent	https://www.dropbox.c 3	I support this proposed	See earlier comment about such occupancies remaining Group B and not
Occupancies	Type Care	Type Care	ambulatory occupants living as a single housekeeping unit in a	homes for ambulatory occupants living as a single	om/s/qdbc0papkx3z9ls	change with modification(s).	residential occupancy.
	Occupancies	Occupancies	dwelling unit with sleeping accommodation for not more than	housekeeping unit in a dwelling unit with sleeping	Proposed Change 13 20.		
	(New)		10 persons are permitted to be classified as residential	accommodation for not more than 10 persons are	pdf?dl=0		(1) Children's custodial homes and convalescent homes for ambulatory
	,		occupancies	permitted to be classified as residential occupancies			occupants living as a single housekeeping unit in a dwelling unit with sleep
			(Group C).	(Group C).			accommodation for not more than 10 persons are permitted to be classified
			(2) <i>Home-type care occupancies</i> with sleeping accommodation	(2) Home-type care occupancies with sleeping			CARE occupancies
			for not more than 10 persons shall	accommodation for not more than 10 persons shall			(Group B).
			(a) comply with the applicable requirements of Part 9 relating	(a) comply with the applicable requirements of			(3-3-1 _p -)
			to detached houses, and	Part 9 relating to detached houses, and			(2) Home-type care occupancies with sleeping accommodation for not mo
			(b) except as provided in Sentences (3) and (4), be	(b) except as provided in Sentences (3) and (4), be			than 10 persons shall
			(i) sprinklered in conformance with NFPA 13D, "Standard for	(i) sprinklered in conformance with NFPA 13D, "Standard for the Installation of			(a) comply with the applicable requirements of Part 9 relating to detached
			the Installation of Sprinkler Systems in One- and Two- Family	Sprinkler Systems in One- and Two- Family Dwellings and Manufactured			houses, and
			Dwellings and Manufactured Homes," and	Homes," and			(b) except as provided in Sentences (3) and (4), be
			(ii) provided with a minimum 30-minute water supply for the				(i) sprinklered in conformance with NFPA 13D, "Standard for the Installa
				(ii) provided with a minimum 30-minute water supply for the sprinkler system.			
			sprinkler system.	(3) A sprinkler system need not be provided in			of Sprinkler Systems in One- and Two- Family Dwellings and Manufactu
			(3) A sprinkler system need not be provided in accordance with	accordance with Sentence (2) where the building			Homes," and
			Sentence (2) where the building	(a) is 1 storey in building height, without a			(ii) provided with a minimum 30-minute water supply for the sprinkler
			(a) is 1 storey in building height, without a	basement or mezzanine,			system.
			basement or mezzanine,	(b) has sleeping accommodation for not more			
			(b) has sleeping accommodation for not more than 4 residents	than 4 residents receiving care on a floor area served by 2 barrier-			(3) A sprinkler system need not be provided in accordance with Sentence
				free means of egress leading to an exit at ground level that is not			where the building
			egress leading to an exit at ground level that is not more than 30				(a) is 1 storey in building height, without a
			m from any point in the <i>floor area</i> ,	(c) in lieu of having <i>smoke alarms</i> installed as required in Subsection 9.10.19., has a			basement or mezzanine,
			(c) in lieu of having smoke alarms installed as required in	residential fire warning system installed in conformance with CAN/ULC-S540,			(b) has sleeping accommodation for not more than 4 residents receiving ca
			Subsection 9.10.19., has a residential fire warning system				on a floor area served by 2 barrier-free means of egress leading to an exit
			installed in conformance with CAN/ULC-S540,				ground level that is not more than 30 m from any point in the floor area,
			"Standard for Residential Fire and Life Safety Warning	"Standard for Residential Fire and Life Safety			(c) in lieu of having smoke alarms installed as required in Subsection 9.10
			Systems: Installation, Inspection, Testing and Maintenance,"	Warning Systems: Installation, Inspection, Testing and Maintenance,"			has a residential fire warning system installed in conformance with
			(i) with <i>smoke detectors</i> in each sleeping room, in the kitchen,	(i) with <i>smoke detectors</i> in each sleeping room, in the kitchen, and in common			CAN/ULC-S540,
			and in common spaces such as activity rooms, corridors and	spaces such as activity rooms, corridors and hallways,			,
			hallways,	(ii) with <i>heat detectors</i> in each attached <i>storage garage</i> , <i>service room</i> , laundry			
			(ii) with heat detectors in each attached storage garage, service	room and storage room,			
			room, laundry room and storage room,	(iii) capable of sounding audible signals in accordance with Articles 9.10.19.2. and			
			(iii) capable of sounding audible signals in accordance with	9.10.19.5. at a frequency not higher than 520 Hz.			
			Articles 9.10.19.2. and	(iv) powered in accordance with Article 9.10.19.4.			
			9.10.19.5. at a frequency not higher than 520 Hz,	(v) equipped with a silencing device in accordance with Article 9.10.19.6.			
			(iv) powered in accordance with Article 9.10.19.4.,	(vi) equipped with an annunciator panel with			
			(v) equipped with a silencing device in accordance with Article	separate zone indication of the actuation of the alarm-initiating devices, and			
			9.10.19.6.,	(vii) designed to notify the fire department in conformance with Sentence 3.2.4.8.(4)			
			(vi) equipped with an annunciator panel with separate zone	that an alarm signal has been initiated,			
			indication of the actuation of the alarm-initiating devices, and	(d) has emergency lighting in the common <i>means</i>			
				of egress that complies with Sentences 9.9.12.3.(2) to (7), and (e) complies with			
			Sentence 3.2.4.8.(4) that an <i>alarm signal</i> has been initiated,	Section 3.8.			
			(d) has emergency lighting in the common means of egress that	(4) A sprinkler system need not be provided in accordance with Sentence (2) where			
			complies with Sentences 9.9.12.3.(2) to (7), and (e) complies	(a) the <i>building</i> is not more than 2 <i>storeys</i> in			
			with Section 3.8.	building height.			
			(4) A sprinkler system need not be provided in accordance with	(b) the <i>building</i> has sleeping accommodation for			
			Sentence (2) where	not more than 4 residents receiving <i>care</i> only on the <i>first storey</i> ,			
			(a) the <i>building</i> is not more than 2 <i>storeys</i> in	(c) the <i>first storey</i> is served by 2 <i>barrier-free</i>			
			building height,	means of egress leading to an exit at ground			
			(b) the <i>building</i> has sleeping accommodation for not more than	level that is not more than 30 m from any point in the <i>first storey</i> ,			
			4 residents receiving <i>care</i> only on the <i>first storey</i> .	(d) in lieu of having <i>smoke alarms</i> installed as			
			(c) the first storey is served by 2 barrier-free means of egress	required in Subsection 9.10.19., the <i>building</i>			
			leading to an <i>exit</i> at ground level that is not more than 30 m	has a residential fire warning system installed in conformance with CAN/ULC-S540,			
			from any point in the <i>first storey</i> ,	"Standard for Residential Fire and Life Safety Warning			
			(d) in lieu of having <i>smoke alarms</i> installed as required in				
			Subsection 9.10.19., the <i>building</i> has a residential fire warning				
			system installed in conformance with CAN/ULC-S540,				
	1		"Standard for Residential Fire and Life Safety Warning			1	

	1	1		Systems: Installation, Inspection, Testing and Maintenance,"	Systems: Installation, Inspection, Testing and Maintenance,"		1	1	1
ı				(i) with <i>smoke detectors</i> in each sleeping room, in the kitchen,	(i) with <i>smoke detectors</i> in each sleeping room, in the kitchen, and in common				
ı				and in common spaces such as activity rooms, corridors and	spaces such as activity rooms, corridors and hallways,				
i				hallways,	(ii) with <i>heat detectors</i> in each attached <i>storage garage</i> , <i>service room</i> , laundry				
ı				(ii) with <i>heat detectors</i> in each attached <i>storage garage</i> , <i>service</i>					
i				room, laundry room and storage room,	(iii) capable of sounding audible signals in accordance with Articles 9.10.19.2. and				
i				(iii) capable of sounding audible signals in accordance with	9.10.19.5. at a frequency not higher than 520 Hz,				
ı				Articles 9.10.19.2. and	(iv) powered in accordance with Article 9.10.19.4.				
ı				9.10.19.5. at a frequency not higher than	(v) equipped with a silencing device in accordance with Article 9.10.19.6.				
ı				520 Hz.	(vi) equipped with an annunciator panel with				
ı				(iv) powered in accordance with Article 9.10.19.4	separate zone indication of the actuation of the alarm-initiating devices, and				
ı				(v) equipped with a silencing device in accordance with Article					
ı				9.10.19.6	that an <i>alarm signal</i> has been initiated,				
ı				(vi) equipped with an annunciator panel with separate zone	(e) all <i>floors</i> of the <i>building</i> have emergency				
ı				indication of the actuation of the alarm-initiating devices, and	lighting in the common <i>means of egress</i> that complies with Sentences 9.9.12.3.				
ı				(vii) designed to notify the fire department in conformance with					
ı				Sentence 3.2.4.8.(4) that an <i>alarm signal</i> has been initiated,	(f) the <i>basement</i> is separated from the remainder				
ı				(e) all <i>floors</i> of the <i>building</i> have emergency lighting in the	of the <i>building</i> by a door that complies with Sentence 9.10.9.3.				
i				common means of egress that complies with Sentences	(2) and by a continuous smoke-tight barrier consisting of not less than				
i				9.9.12.3.(2) to (7),	12.7 mm thick gypsum board installed on				
Ì				(f) the <i>basement</i> is separated from the remainder of the <i>building</i>					
Ì				by a door that complies with Sentence 9.10.9.3.(2) and by a	(ii) the underside of the floor-ceiling framing, (g) an air-				
Ì				continuous smoke-tight barrier consisting of not less than	handling system designed to shut down				
i				12.7 mm thick gypsum board installed on					
i					upon a signal from the residential fire				
ı				(i) both sides of the walls, and	warning system serves the basement and other				
ı				(ii) the underside of the floor-ceiling framing,	storeys, and				
ı				(g) an air-handling system designed to shut down upon a signal					
ı				from the residential fire warning system serves the <i>basement</i>	type care occupancies with sleeping				
ı				and other storeys, and	accommodation for more than 10 persons shall				
ı				(h) the <i>first storey</i> complies with Section 3.8.	comply with the applicable requirements of Part 3 relating to care occupancies.				
ı				(5) Home-type care occupancies with sleeping accommodation					
ı				for more than 10 persons shall comply with the applicable					
D: D :	0 1 .	(T.11.2 F: 10. 1D.: (CF) (C.I. 1	T.11 0 10 2 1 D	requirements of Part 3 relating to care occupancies.	(D.C. et al. N.C. al DOD.C. al. et al	1 // 11	2	T	Dirid (II F d : d ODG d d : : C
Fire Resistance and	Supplementary	(Table 2 - Fire and Sound Resistance of Floors, Ceilings and	Table 9.10.3.1.B	(Table 9.10.3.1.B - Fire and Sound Resistance of Floors,	(Refer to the National PCF for changes to the tables).	https://www.dropbox.c	3	I support this proposed	Publish the tables directly in the OBC rather than requiring reference to yet
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Fire Resistance and	Supplementary	(Table 1 - Fire and Sound Resistance of Walls)	Table 9.10.3.1.A	(Table 9.10.3.1.A - Fire and Sound Resistance of Walls)	(Refer to the National PCF for changes to the tables).	https://www.dropbox.c	3	I support this proposed	Publish the tables directly in the OBC rather than requiring reference to yet
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Fire Resistance and	Supplementary	(Table 1 - Fire and Sound Resistance of Walls)	Table 9.10.3.1.A	(Table 9.10.3.1.A - Fire and Sound Resistance of Walls)	(Refer to the National PCF for changes to the tables).	https://www.dropbox.c	3	I support this proposed	Publish the tables directly in the OBC rather than requiring reference to yet
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ı						Proposed Change 14 96.			
ı						pdf?dl=0			
Penetrations	9.10.9.7.A.	N/A	9.10.9.7.A	(1) Except as provided in Sentences (2) to (5), outlet boxes are	(1) Except as provided in Sentences (2) to (5) outlet	https://www.dropbox.c	3	I support this proposed	SCOBCAR commented on this for 2020 NBC and our propsoed changes were
1	Penetrations by	1	Penetrations by	permitted to penetrate the membrane of an assembly required to		om/s/ngkucu9qng32h0		change with modification(s).	not incorproated - same position remains. Refer also to 3.1.9.3 as well.
ı	Outlet Boxes or		Outlet Boxes or	have a fire-resistance rating,	assembly required to have a fire-resistance rating,	5/Proposed Change 1 576.		change with mounteation(s).	not meorproduced sume position remains. Refer also to 3.1.7.3 as well.
Ì	Service			provided they are sealed at the penetration by a <i>firestop</i> that,	provided they are sealed at the penetration by a	pdf?dl=0			
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1	Equipment in		in Concealed	when subjected to the fire test method in CAN/ULC-S115, "Standard Method of Fire Tests of Fireston Systems," has an	firestop that, when subjected to the fire test method in CAN/ULC-S115, "Standard Method of Fire Tests of Firestop Systems" has an ET rating not less than the				
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9) of Framing of Framing change as is with comment(s). another external document. Om/s/awthfvn3rcbmz1a / Proposed Change 13 03. pdf?dl=0 pdf.dl=0 p								
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Structural Design (Part 9) 23.3.4. Nailing for Framing 10 23.3.4. Nailing for Framing 25.3.3.4. Nailing for Framing 25.3.3. Nailing for Framing				separation conforming to Sentence 9.10.9.10.(2), provided the	(2), provided the penetration is sealed by			
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service equipment is located entirely within the cavity of a wall assembly above and below the horizontal fire separation having a required fire-resistance rating, or (c) a firestop conforming to Clause 9.10.9.6.(1)(a), where the penetration is (i) contained within the concealed space of a floor or ceiling assembly having a fire-resistance rating, or (iii) located above a ceiling membrane providing a horizontal fire separation nor (iii) contained within the concealed space of a floor or ceiling assembly having a fire-resistance rating, or (iii) located above a ceiling membrane providing a horizontal fire separation, or (iii) contained within the concealed space of a floor or ceiling assembly having a fire-resistance rating, or (iii) contained within a horizontal service space conforming to Sentence 9.10.9.10.(2) that is directly above or below a floor or ceiling. Structural Design (Par 9) Structural Design (Par 19) Structural Design (Par								
assembly above and below the horizontal fire separation having a required five-resistance rating, or (c) a firestop conforming to Clause 9,10.9.6.(1)(a), where the penetration is (i) contained within the concealed space of a floor or ceiling assembly having a five-resistance rating, (ii) located above a ceiling membrane providing a horizontal fire separation, or (iii) contained within a horizontal service space conforming to Clause 9,10.9.10.(2) that is directly above or below a floor or ceiling. Structural Design (Part 9) Structural Design (Part 9) Structural Design (Part 19) Structur								
a required fire-resistance rating, or (c) a firestop conforming to Clause 9.10.9.6.1(1/a), where the penetration is (i) contained within the concealed space of a floor or ceiling assembly having a fire-resistance rating, (ii) located above a ceiling membrane providing a horizontal fire separation, or (iii) contained within the concealed space of a floor or ceiling assembly having a fire-resistance rating, (ii) located above a ceiling membrane providing a horizontal fire separation, or (iii) contained within the concealed space of a floor or ceiling. Structural Design (Part 9) Struc				service equipment is located entirely within the cavity of a wall	assembly above and below the horizontal fire separation having a required fire-			
Contained within the concealed space of a floor or ceiling assembly having a fire-restance rating, (i) located above a ceiling membrane providing a horizontal fire separation, or (iii) contained within a horizontal service space conforming to Sentence 9.10.9.10.2 that is directly above or below a floor or ceiling. Sinuctural Design (Part 9,23.3.4. Nailing of Framing) OF Taming								
Perstation is (i) contained within the concealed space of a floor or ceiling assembly having a fire-resistance rating, (ii) contained within a horizontal fire separation, or (iii) contained within a horizontal service space conforming to Sentence 9.10.9.10, (2) that is directly above or below a floor or ceiling. Structural Design (Part 9)								
Ci) contained within the concealed space of a floor or ceiling assembly having a fire-resistance rating, (ii) located above a ceiling membrane providing a horizontal fire separation, or (iii) contained within a horizontal service space conforming to Sentence 9, 10, 9, 10, 2) that is directly above or below a floor or ceiling. Structural Design (Part 9)								
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Basements 9.25.2.3. (4) Insulation on the interior of foundation walls enclosing a loss and space shall be applied so that there is not less than a 50 Thermal Insulation Thermal Insulation Insulation Thermal Insulation Th	9)	of Framing					change as is with comment(s).	
Basements 9.25.2.3. (4) Insulation on the interior of foundation walls enclosing a loss and space shall be applied so that there is not less than a 50 Thermal Insulation Thermal Insulation Insulation Thermal Insulation Th	· .	_				/Proposed_Change_13 03.		
Installation of Thermal Insulation of Insula					<u> </u>			
Installation of Thermal Insulation of Installation of Thermal Insulation of Insulation	Basements							Retain the requirement "and to be a type that will not be damaged by water"
Insulation a type that may be damaged by water. and ance above the crawl space floor if the insulation is of a type that may be damaged by a pdf?dl=0					onshall be installed over the interiorfull height of foundation walls enclosing a basem	om/s/qm405vnti0tskm		
			s of Thermal Insulation		ent or heated crawl space shall be applied so that there is not less than a 50 mm clear	5/Proposed_Change_1 555.		
water	1	Insulation a type that may be damaged by water.				pdf?dl=0		

- Part 12 Resource Conservation and Environmental Integrity
- National Energy Code for Buildings
- Section 9.36 Energy Efficiency

- * Please refer to the tab named Table_2-Section_9.36
- In addition to the revisions below, any requirements that are expired, will be removed (e.g. 12.2.1.1.).
 The National Energy Code of Canada for Buildings 2017 can be viewed at its record in the NRC Publications Archive by clicking here.
 Current Supplementary Standard SB-10 is provided here for comparison.

• Current Supplementary Standard SB-12 is provided here for comparison.

Subject	Ontario Code Article	Current Ontario Code Provision(s)	Proposed Changes to the Code Provision(s)	Proposed Ontario Code Provision(s)	F	Rank	Status	Comments
Peak Electric Demand	Peak Electric	set out in MMA Supplementary Standard SB-10, "Energy Efficiency Requirements".	set out in MMA Supplementary Standard SB-10; "Energy Efficiency Requirements".	(1) Except as provided in Sentence (2), all <i>buildings</i> shall be designed to conform to the peak electric demand requirements by not exceeding the level achieved by complying with Parts 1 to 7 of the 2020 NECB as amended. (2020 NECB has not been released yet - See 2017 NECB and the proposed changes as amended to 2017 NECB which will form the 2020 NECB).		2		Wording is awkward and confusing. Suggest: "all buildings shall be designed to not exceed the peak electric demand achieved by complying with"