

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.

The Secretary, Canadian Board for Harmonized Construction Codes
1200 Montreal Road, Building M-20
Ottawa, ON K1A 0R6

Sent by email to: CBHCCSecretary-SecretaireCCHCC@nrc-cnrc.gc.ca,
Codes.publicreview@nrc-cnrc.gc.ca

April 25, 2023

Re: CBHCC Consultation on Changes to the National Building Code and National Plumbing Code – Winter 2023

To Whom It May Concern:

The Ontario Association of Architects (OAA) continues to monitor and respond to proposals to harmonize the Ontario Building Code with the National Codes.

The OAA supports the Canadian Board for Harmonized Construction Codes (CBHCC) proposed changes to the National Building Code of Canada (NBC) and National Plumbing Code (Winter 2023 Consultation) as is, with additional notes on two items:

- 3.1.5. Noncombustible Construction: 1786 - Combustible Components in Swimming Pools and Hot Tubs; and
- 9.23.13. Bracing to Resist Lateral Loads Due to Wind and Earthquake: 1475 - Resistance to Lateral Loads.

In both of these cases, while the Association supports the proposed changes, it also offers further comments to strengthen the proposal.

The OAA is particularly interested in the proposed updates related to resistance of lateral loads as referenced in this consultation. The Association notes that proposed change 1475 updates the Part 9 provisions for resistance to lateral loads due to earthquakes and wind. As the regulator of the profession of architecture in Ontario, we continue to work to ensure the continued professional competency and currency of OAA licensed members in order that they maintain their leadership role in the built environment accountable to the public interest. The OAA also supports updates related to emergency lighting in universal washrooms and shower rooms (which would impact 3.8.3.13 Universal Washroom and 3.8.3.17 Showers).



The OAA enjoys a longstanding, collaborative relationship with government and policymakers, and looks forward to continued work with CBHCC to ensure that energy efficiency and accessibility remain key parts of the National Model Codes.

Sincerely,

S. T. Vilardi

Settimo Vilardi, Architect
M.Arch., OAA, MRAIC, LEED AP BD+C
President



OAA's Submission - Winter 2023: Public Review of Proposed Changes to 2020 National Model Codes

Table: Potential Changes To the NBC 2020 and NPC 2020:

Background from CBHCC:

The proposed changes included in this public review address the following topics in the National Building Code of Canada and the National Plumbing Code of Canada: structural design (Part 9) – lateral loads, large farm buildings, building fire safety, fire protection, combustible construction – fire protection and safety, fire alarm and detection systems, encapsulated mass timber construction, spatial separation between buildings, accessibility – inclusive plumbing accommodation, environmental separation, spray-applied polyurethane insulation and drainage systems.

The purpose of this public review is to provide code users and stakeholders with a detailed look at proposed technical changes, and seek comment on each proposed technical change as to whether it should be approved, altered or withdrawn.

Legend for Rankings: 1. I support this proposed change as is. | 2. I support this proposed change as-is with comment(s). | 3. I support this proposed change with modification(s).
| 4. I do not support this proposed change for the reason(s) stated to the right. | 5. I have reviewed this proposed change and I have no opinion on it. | 6. Not Reviewed

National Building Code 2020

Proposed Code Reference and Title	Ranking 1-6	Status	Comments - Ontario Association of Architects
Division B			
Part 1 - General			
1.1.3.1. Climatic and Seismic Values			
1775 - Seismic Hazard Values for the Design of Part 9 Buildings	1	I support this proposed change as is.	
Part 2 - Farm Buildings			
2.2.1.8. Fire Blocks	1		
1793 - Fire Blocks in Concealed Wall Spaces in Farm Buildings	1	I support this proposed change as is.	
Part 3 - Fire Protection, Occupant Safety and Accessibility			
3.1.4.2. Protection of Foamed Plastics	1		
1476 - Testing of Protection for Foamed Plastic Insulation	1	I support this proposed change as is.	
3.1.4.8. Exterior Cladding			
1791 - Combustible Cladding and Street Frontage of Mid-rise Combustible Buildings	1	I support this proposed change as is.	
3.1.5. Noncombustible Construction			
1786 - Combustible Components in Swimming Pools and Hot Tubs	2	I support this proposed change as is with comment(s).	We are curious as to why the new sentence 3.1.5.1.(25) is not listed in the OBJECTIVE-BASED ANALYSIS OF NEW OR CHANGED PROVISIONS Table.
3.1.5.15. Foamed Plastic Insulation			
1476 - Testing of Protection for Foamed Plastic Insulation	1	I support this proposed change as is.	
3.1.8.11. Installation of Smoke Dampers			
1699 - Activation of Smoke Dampers by Smoke Detectors	1	I support this proposed change as is.	
3.2.2.10. Streets			
1791 - Combustible Cladding and Street Frontage of Mid-rise Combustible Buildings	1	I support this proposed change as is.	
3.2.2.48. Group C, up to 12 storeys, Sprinklered			
1792 - Increase of Height Limit for EMTC Buildings in Group C, up to 12 Storeys and Sprinklered	1	I support this proposed change as is.	
3.2.2.57. Group D, up to 12 storeys, Sprinklered			
1794 - Increase of Height Limit for EMTC Buildings in Group D, up to 12 Storeys and Sprinklered	1	I support this proposed change as is.	
3.2.3.1. Limiting Distance and Area of Unprotected Openings			
1680 - Spatial Separation Table Values	1	I support this proposed change as is.	

OAA's Submission - Winter 2023: Public Review of Proposed Changes to 2020 National Model Codes

Table: Potential Changes To the NBC 2020 and NPC 2020:

National Building Code 2020

Proposed Code Reference and Title	Ranking 1-6	Status	Comments - Ontario Association of Architects
3.2.5.6. Access Route Design			
1791 - Combustible Cladding and Street Frontage of Mid-rise Combustible Buildings	1	I support this proposed change as is.	
3.8.3.13. Universal Washrooms			
1763 - Emergency Lighting in Universal Washrooms and Shower Rooms	1	I support this proposed change as is.	
3.8.3.17. Showers			
1763 - Emergency Lighting in Universal Washrooms and Shower Rooms	1	I support this proposed change as is.	
Part 5 - Environmental Separation			
5.9.1.1. Compliance with Applicable Standards			
1801 - Deletion of Reference to Outdated CAN/CGSB Standard	1	I support this proposed change as is.	
1802 - Deletion of Reference to Outdated CAN/CGSB Standard	1	I support this proposed change as is.	
1803 - Introduction of References to New Material and Installation Standards for Light Density, Open Cell Spray-applied Polyurethane Foam	1	I support this proposed change as is.	
Part 9 - Housing and Small Buildings			
9.4.1.1. General			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.4.2. Specified Loads			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.20.1. Application			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.23.1.1. Limitations			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.23.3.1. Standards for Nails and Screws			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.23.3.4. Nailing of Framing			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.23.3.5. Fasteners for Sheathing or Subflooring			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.23.6.1. Anchorage of Building Frames			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.23.11.4. Joints in Top Plates			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.23.13. Bracing to Resist Lateral Loads Due to Wind and Earthquake			
1475 - Resistance to Lateral Loads	2	I support this proposed change as is with comment(s).	This article could benefit from an appendix asterix note that describes the difference between heavy weight construction and normal weight construction. The Appendix table provided is much appreciated.

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Table: Potential Changes To the NBC 2020 and NPC 2020:

National Building Code 2020

Proposed Code Reference and Title	Ranking 1-6	Status	Comments - Ontario Association of Architects
9.23.16.1. Required Roof Sheathing			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.23.16.5. Lumber Roof Sheathing			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.31.6.2. Equipment and Installation			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
9.33.4.7. Structural Movement			
1475 - Resistance to Lateral Loads	1	I support this proposed change as is.	
Appendix C			
1775 - Seismic Hazard Values for the Design of Part 9 Buildings	1	I support this proposed change as is.	

National Plumbing Code 2020

Proposed Code Reference and Title	Ranking Select 1-6	Status	Comments - Ontario Association of Architects
Division B			
Part 2 - Plumbing Systems			
2.4.9.2. Serving Water Closets			
1390 - Size of Drainage Pipes Serving Water Closets	1	I support this proposed change as is.	