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## Proposed Change 1938

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<b>Code Reference(s):</b>	<b>NBC20 Div.B 3.2.3.16.(4) (first printing)</b> <b>NBC20 Div.B 3.2.5.11.(6) (first printing)</b> <b>NBC20 Div.B 3.3.1.17.(6) (first printing)</b> <b>NBC20 Div.B 3.4.2.6.(2) (first printing)</b>
Subject:	Automatic Sprinkler System
Title:	Removal of Redundant Sprinkler References
Description:	This proposed change removes redundant cross-references to Article 3.2.5.12. in Part 3 of Division B of the NBC.

This change could potentially affect the following topic areas:

- |  |   |
|--|---|
| <input type="checkbox"/> Division A                                | <input checked="" type="checkbox"/> Division B              |
| <input type="checkbox"/> Division C                                | <input checked="" type="checkbox"/> Design and Construction |
| <input type="checkbox"/> Building operations                       | <input type="checkbox"/> Housing                            |
| <input checked="" type="checkbox"/> Small Buildings                | <input checked="" type="checkbox"/> Large Buildings         |
| <input checked="" type="checkbox"/> Fire Protection                | <input type="checkbox"/> Occupant safety in use             |
| <input type="checkbox"/> Accessibility                             | <input type="checkbox"/> Structural Requirements            |
| <input type="checkbox"/> Building Envelope                         | <input type="checkbox"/> Energy Efficiency                  |
| <input type="checkbox"/> Heating, Ventilating and Air Conditioning | <input type="checkbox"/> Plumbing                           |
|  | <input type="checkbox"/> Construction and Demolition Sites  |

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## Problem

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Currently, several Sentences in Part 3 of Division B of the National Building Code of Canada (NBC) 2020 include cross-references to the requirements for automatic sprinklers in Article 3.2.5.12. in addition to references to the defined term "sprinklered." These cross-references are seen as being redundant and could be removed.

Article 3.2.5.12. includes provisions that mandate

- when the requirements of a referenced standard apply to a building or part of a building that is required to be sprinklered, and
- which of the following three referenced standards for sprinkler systems applies:
  - NFPA 13, "Standard for the Installation of Sprinkler Systems,"
  - NFPA 13D, "Standard for the Installation of Sprinkler Systems in One- and Two-Family Dwellings and Manufactured Homes," or
  - NFPA 13R, "Standard for the Installation of Sprinkler Systems in Low-

## Rise Residential Occupancies."

This proposed change aims to remove redundant references within the Code wording to clarify and thereby eliminate any potential confusion as to when sprinklers are required in the NBC.

Article 3.2.5.12. also presents specific rules and exceptions that apply beyond the installation and design requirements of the applicable referenced standards.

This proposed change removes redundant cross-references within the Code to eliminate any potential confusion as to when sprinklers are required by the NBC.

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## Justification

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In combination with the defined term "sprinklered," use of the phrase "in accordance with Article 3.2.5.12.", "in conformance with Article 3.2.5.12.", or "in accordance with Sentence 3.2.5.12.(1)" is considered unnecessary. It is seen as repeating the same requirements established by use of the defined term.

Invoking the term as defined, "*Sprinklered* (as applying to a *building* or part thereof) means that the *building* or part thereof is equipped with system of automatic sprinklers," is considered sufficient for Code users to understand the application of the requirement for an automatic sprinkler system.

This proposed change would eliminate any potential confusion as to when sprinklers are required in the NBC by removing redundant cross-references within the Code.

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## PROPOSED CHANGE

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### **[3.2.3.16.] 3.2.3.16. Protection of Soffits**

- [1] 4)** The protection required by Sentence (1) for projections is permitted to be omitted if
- [a] a) the *fire compartments* behind the window and door openings are *sprinklered* ~~in accordance with Article 3.2.5.12.~~, and
  - [b] b) all rooms, including closets and bathrooms, having openings in the wall beneath the soffit are *sprinklered*, notwithstanding exceptions permitted in the standards referenced in Article 3.2.5.12. for the installation of automatic sprinkler systems.

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### **[3.2.5.11.] 3.2.5.11. Hose Stations**

- [1] 6)** Where a *building* or part thereof is used as a *distillery* and the *building* is *sprinklered* ~~in conformance with Article 3.2.5.12.~~, small hose (38 mm) stations are permitted to be supplied from interior sprinkler piping.

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### **[3.3.1.17.] 3.3.1.17. Capacity of Access to Exits**

- [1] 6)** In a *building* that is not *sprinklered* throughout ~~in accordance with~~

~~Sentence 3.2.5.12.(1)~~, an *access to exit* that is part of the principal entrance serving a dance hall or a licensed beverage establishment with an *occupant load* more than 250 shall provide at least one half of the required *exit* width.

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### **[3.4.2.6.] 3.4.2.6. Principal Entrances**

- [1] 2)** In a *building* that is not *sprinklered* throughout ~~in accordance with Sentence 3.2.5.12.(1)~~, the principal entrance serving a dance hall or a licensed beverage establishment with an *occupant load* more than 250 shall provide at least one half of the required *exit* width.
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## **Impact analysis**

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This proposed change clarifies the intent of the Code by using consistent wording. It also removes redundant cross-references to Article 3.2.5.12. to eliminate potential confusion resulting from inconsistent wording. No additional costs are expected.

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## **Enforcement implications**

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This proposed change is intended to clarify the intent of the requirements, which should aid in the understanding and enforcement of the Code.

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## **Who is affected**

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Authorities having jurisdiction, designers and contractors.

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## **OBJECTIVE-BASED ANALYSIS OF NEW OR CHANGED PROVISIONS**

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**[3.2.3.16.] 3.2.3.16. ([1] 4) [F02-OS1.2]**

**[3.2.3.16.] 3.2.3.16. ([1] 4) [F02-OP1.2]**

**[3.2.3.16.] 3.2.3.16. ([1] 4) no attributions**

**[3.2.5.11.] 3.2.5.11. ([1] 6) [F02-OS1.2]**

**[3.2.5.11.] 3.2.5.11. ([1] 6) [F02-OP1.2]**

**[3.3.1.17.] 3.3.1.17. ([1] 6) [F10-OS3.7]**

**[3.4.2.6.] 3.4.2.6. ([1] 2) [F10-OS3.7]**