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Proposed Change 1919

Code Reference(s):	NFC20 Div.A 2.1.1.2. (first printing)
Subject:	Large Farm Buildings (General)
Title:	Introduction of the OP3 Sub-Objective for Large Farm Buildings in the NFC
Description:	This proposed change facilitates the introduction of the spatial separation sub-objective (OP3) for farm building requirements in the NFC by revising Sentence 2.1.1.2.(2) of Division A.
Related Proposed Change(s):	PCF 1777, PCF 1918, PCF 1935, PCF 1936

This change could potentially affect the following topic areas:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Division A | <input type="checkbox"/> Division B |
| <input type="checkbox"/> Division C | <input type="checkbox"/> Design and Construction |
| <input type="checkbox"/> Building operations | <input type="checkbox"/> Housing |
| <input 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 |

Problem

In the 2015-2020 Code cycle, new technical requirements for large farm buildings were developed for publication in the 2020 editions of the National Building Code of Canada (NBC) and the National Fire Code of Canada (NFC). The new requirements were intended to address the Codes' life safety (OS) objectives, following the initial direction provided by the Canadian Commission on Building and Fire Codes (CCBFC).

In the course of this work, the CCBFC was consulted on whether spatial separation requirements should also be considered for farm buildings. In September 2019, the Executive Committee (EC) of the CCBFC, after consulting with the provinces and territories, requested that the Joint Task Group drafting the provisions "follow the normal Code development process when developing requirements for spatial separation."

Due to time limitations, spatial separation requirements for farm buildings were not included in the 2020 editions of the NBC and NFC, nor were the OP3 sub-objective or intent statements. As such, there is a need to continue this work, which was deferred from the 2015-2020 Code cycle with the intention that these requirements and objectives would be included in the 2025 editions of these Codes.

For the 2020-2025 Code cycle, the Province of Ontario led the work to develop spatial separation requirements for large farm buildings in the NBC. Codes Canada expanded the application of the OP3 sub-objective to existing requirements in the NBC and introduced relevant intent statements where appropriate, as directed by the EC.

However, Sentence 2.1.1.2.(2) of Division A of the NFC 2020 indicates that OP objectives do not apply to farm buildings, which conflicts with the direction provided by the EC in September 2019. This conflict needs to be resolved to allow new and future proposed changes related to the introduction of the OP3 sub-objective to proceed.

Justification

Sentence 2.1.1.2.(2) of Division A should be revised, as it is in conflict with the direction provided by the EC of the CCBFC. The revision will permit the OP3 spatial separation sub-objective and related technical requirements to be considered for farm buildings in the NFC.

PROPOSED CHANGE

[2.1.1.2.] 2.1.1.2. Application of Objectives

- [1] 1) Except as provided in Sentence (2), the objectives described in this Part apply
- [a] a) to all *buildings* and facilities covered in this Code (see Article 1.1.1.1.), and
 - [b] b) only to the extent that they relate to compliance with this Code as required in Article 1.2.1.1.
- [2] 2) Objective OP, Fire Protection of Buildings and Facilities, ~~except for (including Sub-Objectives OP1, Fire Protection of the Building or Facility, and OP3, Protection of Adjacent Buildings or Facilities from Fire),~~ does not apply to *farm buildings*.

Impact analysis

No new costs or technical requirements would be introduced by this proposed change. Rather, the change would allow the OP3 sub-objective to be considered for farm buildings in the NFC.

Future technical requirements related to spatial separation may impact farm building use and construction costs. These requirements would be evaluated separately, with impact analyses that are specific to the proposed technical requirements in question.

Enforcement implications

This proposed change does not on its own introduce any technical requirements that would need to be enforced by authorities having jurisdiction (AHJs), but AHJs should be aware that the OP3 sub-objective now applies to farm buildings in the NFC.

Who is affected

Affected persons would include AHJs, architects, engineers, contractors and building owners, since they should be made aware that the OP3 sub-objective now applies to farm buildings.