

## Submit a comment

**Proposed Change 2054**

<b>Code Reference(s):</b>	<b>NBC25 Div.B 3.8.3.8.(1) (first printing)</b>
Subject:	Accessibility
Title:	Clarification of Installation Location for Accessible Controls
Description:	This proposed change clarifies that the prescribed height range for accessible controls should be determined in relation to the finished floor and the centre line of the controls.

This change could potentially affect the following topic areas:

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|--|---|
| <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 type="checkbox"/> Fire Protection                           | <input checked="" type="checkbox"/> Occupant safety in use  |
| <input checked="" 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**

Subclause 3.8.3.8.(1)(a)(ii) of Division B of the National Building Code of Canada (NBC) requires that controls (such as light switches and door opening and closing hardware) in buildings required to be barrier-free be installed 400 mm to 1 200 mm above the floor, so that the controls are accessible from a standing position or a seated position in a wheelchair or scooter.

However, the language is unclear as to which part of the accessible control (i.e. the top, centre or bottom) should be used to determine the height range. The lack of clarity could result in certain components of controls being installed in locations outside the prescribed height range. This could lead to people not being able to access and use the building's facilities. In some cases, not being able to reach the controls in buildings could also lead to delays notifying emergency responders in an emergency situation, potentially impacting the safety of the occupants who initiated the notification and others in the building.

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## Justification

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The proposed change clarifies that the prescribed height range for accessible controls in Subclause 3.8.3.8.(1)(a)(ii) applies to the centre line of the control. This clarification should facilitate enforcement and provide more consistent guidelines for electricians, who may not know the exact device to be installed.

By providing clarity on the application of the prescribed height range for accessible controls, the proposed change is expected to forestall confusion among designers, builders, building officials and other Code users, and allow for a more consistent application of the requirements.

The proposed change also clarifies that the height is measured from the finished floor, as inspectors typically check the height of elements once the floor is finished. It is understood that at the rough-in stage the flooring may not be determined yet and is not finished. A range specified in this Subclause could minimize the impact of flooring thickness.

There are also proposed changes to the attribution and intent statements to clarify the intent of the requirement, which is to facilitate the use of the building's facilities by persons with physical or sensory limitations in order to notify emergency responders in a timely manner.

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## PROPOSED CHANGE

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### **[3.8.3.8.] 3.8.3.8. Controls**

- [1] 1)** Controls described in this Section shall
- [a] a) where located in a *storey* where a *barrier-free* path of travel is required and unless otherwise stated,
    - [i] i) be in or adjacent to the *barrier-free* path of travel,
    - [ii] ii) be mounted **with the centre line between** ~~at~~ 400 mm **and** ~~to~~ 1 200 mm above the **finished** floor, and
    - [iii] iii) be adjacent to and centred on either the length or the width of a clear floor space of 1 350 mm by 800 mm,
  - [b] b) be operable
    - [i] i) with one hand in a closed fist position, without requiring tight grasping, pinching with fingers, or twisting of the wrist, and
    - [ii] ii) unless otherwise stated, with a force not more than 22 N, and
  - [c] c) where controls provide a feedback signal to the user, it shall be both audible and visible (see Note A-3.8.3.8.(1)(c)).

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## Impact analysis

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This proposed change is expected to simplify Code use and interpretation by providing clarity on the intended application of existing requirements for the installation height of accessible controls. It is not expected to have significant implications for cost or ease of installation because it is a clarification of an existing requirement.

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## Enforcement implications

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This proposed change could be enforced using existing methods for evaluating compliance with installation height requirements. The proposed change is expected to simplify enforcement by clarifying how the prescribed accessible height range should be interpreted and applied.

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## Who is affected

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Building officials' efforts to interpret the NBC requirements for the accessible height of controls would be simplified.

Designers and builders would need to be aware of the proposed clarification and apply the requirements to their work.

Persons with disabilities may benefit from clarity that the centre line of controls needs to be installed in an accessible range where Subclause 3.8.3.8.(1)(a)(ii) applies.

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## OBJECTIVE-BASED ANALYSIS OF NEW OR CHANGED PROVISIONS

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**[3.8.3.8.] 3.8.3.8. ([1] 1) [F74-OA2]**

**[3.8.3.8.] 3.8.3.8. ([1] 1) [~~F10,F13-OS3.7~~,OA2]**