

Proposed Change 2192

Code Reference(s):	NBC25 Div.B 3.3.1.19.(1) (first printing) NBC25 Div.B 3.8.2.10. (first printing) NBC25 Div.B 3.8.3.1. (first printing) NBC25 Div.B 3.8.3.3. (first printing) NBC25 Div.B 3.8.3.9. (first printing)
Subject:	Accessibility
Title:	Updating References to CSA B651 to the 2023 Edition and Simplifying the Framework in NBC Subsection 3.8.3. on the Design Requirements for Accessibility in Buildings Intended for Public Use
Description:	This proposed change updates references to CSA B651 in the NBC to the 2023 edition and simplifies the framework in NBC Subsection 3.8.3. to provide one set of minimum requirements for the design of Part 3 and Part 9 public buildings.

This change could potentially affect the following topic areas:

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|--|---|
| ☐ Division A | ☒ Division B |
| ☐ Division C | ☒ Design and Construction |
| ☐ Building operations | ☐ Housing |
| ☒ Small Buildings | ☒ Large Buildings |
| ☐ Fire Protection | ☐ Occupant safety in use |
| ☒ Accessibility | ☐ Structural Requirements |
| ☐ Building Envelope | ☐ Energy Efficiency |
| ☐ Heating, Ventilating and Air Conditioning | ☐ Plumbing |
| | ☐ Construction and Demolition Sites |

Problem

In the context of public buildings, there is a desire to update the edition of the CSA B651 standard, "Accessible design of the built environment" (CSA B651-18), referenced in the National Building Code of Canada (NBC) from 2018 to 2023, as well as to update the minimum requirements in the NBC in Subsection 3.8.3.

A barrier to processing these updates is founded in the current structure of NBC Subsection 3.8.3., which gives designers the option to comply with either the requirements in the NBC or certain requirements in CSA B651-18. This "dual pathway"

structure was introduced to NBC 2015 and focuses mostly on buildings intended for use by the general public. In its current form (NBC 2025), both pathways are essentially equivalent in performance level, with some minor differences.

However, the introduction of the dual pathway has presented unintended consequences for updating the minimum requirements in Subsection 3.8.3., especially as the overall landscape of accessibility standards for the built environment in Canada has grown more complex in recent years. Amid this increasingly complex and rapidly evolving accessibility landscape, challenges related to the dual pathway that have recently arisen include:

- **Aligning the NBC with updates to this standard in a targeted and expedient way.** CSA Group has requested that the edition of this referenced standard in the NBC be updated from 2018 to 2023. When the edition of a referenced standard is updated in the NBC, the update applies in its entirety (i.e., the NBC will not usually reference different editions of a standard). However, some updated provisions in CSA/ASC B651:23 could more easily be considered to be referenced as NBC requirements than others (e.g., updates to the luminance contrast of tactile walking surface indicators, which already align with industry practice, are simpler to evaluate for reference in the NBC than updates to minimum space requirements, which require further analysis for their feasibility in small buildings and their defensibility as “minimum” requirements). At present, there is a delay in proposing that the NBC reference the more straightforward updates to CSA/ASC B651:23 because further evaluation is required for the more complex requirements in this standard.
- **Maintaining consistent minimum requirements in each pathway, as the NBC and this standard are updated.** Since both pathways are intended to be minimum requirements in the NBC, it is important for their performance level and scope to be consistent; challenges arise related to compliance and enforcement when the pathways diverge. For example, since Codes technical committees are developing new requirements on topics where the performance in certain areas may exceed that in CSA B651-18 or CSA/ASC B651:23 (e.g., installation requirements for menstrual product dispensers), a mismatch in performance between the two pathways is being created and is likely to cause confusion about the minimum requirements in the NBC. Similar issues may arise with the update from CSA B651-18 to CSA/ASC B651:23 (discussed above).
- **Addressing other relevant accessibility standards.** The volume and breadth of relevant accessibility standards is growing rapidly, especially considering the standards being developed by Accessibility Standards Canada (ASC) and other organizations. The dual pathway framework complicates the consideration, and possible introduction, of emerging standards, such as CAN-ASC 2.4., “Wayfinding and Signage”.

To address these challenges and facilitate targeted updates to the NBC related to the accessible design of public buildings, this proposed change updates the edition of CSA B651 referenced in the NBC and simplifies the framework of Subsection 3.8.3.

Justification

The proposed change:

1. simplifies the NBC Subsection 3.8.3. framework by removing the CSA B651 pathway option in Article 3.8.3.1. (while preserving the existing NBC pathway option), and
2. updates the remaining references in the NBC from CSA B651-18 to CSA/ASC B651:23.

Simplification of the NBC Subsection 3.8.3. framework

Simplifying the NBC Subsection 3.8.3. framework by removing the CSA B651 pathway creates a single list of minimum technical requirements (i.e., the NBC pathway). This proposed change would make it easier to:

- Add or update requirements in Subsection 3.8.3. (e.g., regarding accessible change spaces for adults) without creating a mismatch in minimum requirements between dual pathways.
- Directly reference CSA/ASC B651:23 in specific NBC provisions where justified and update references to future editions of the standard in a targeted manner.
- Simplify the consideration and possible future introduction of other relevant standards.

Designers could continue to follow the requirements in CSA/ASC B651:23 if they choose to or if required for their projects, while meeting the legislated minimum NBC requirements. A building designed in accordance with CSA/ASC B651:23 will generally meet or surpass the NBC minima.

The Ontario Building Code and the Alberta Building Code have not adopted the “dual pathway” structure, but do contain the requirements of the “NBC pathway”. As harmonization efforts increase between the provinces and territories, it is expected that a simpler NBC framework will make it easier to achieve and maintain harmony in minimum requirements across Canada by allowing for targeted discussions of individual requirements and their implications for each of the provinces and territories before they are introduced in the NBC.

Updating the remaining references from CSA B651-18 to CSA/ASC B651:23

The NBC currently references specific clauses of CSA B651 for requirements for exterior walks, signage and, where provided, tactile direction indicators, outside of the dual pathway. By removing the dual pathway, updates to these references can be given due consideration.

This proposed change specifically:

- **Exterior walks** (NBC Clause 3.8.3.3.(1)(d)): updates general surface requirements, changes in level, gratings, and headroom and protrusions. The 2023 edition of the standard provides more explanatory material and images, and renumbers certain clause numbers. The only apparent change to technical requirements is related to texture- and luminance-contrasted surfaces, which are required in “large open plazas” (2023 edition) instead of “high pedestrian areas” (2018 edition).

- **Signage** (NBC Article 3.8.3.9.): simplifies requirements for visual information signs, where the 2023 edition of the standard removes a requirement that signs be "of uniform design" (but retains a requirement that signs used to convey the same information in the same facility be consistently shaped, coloured and positioned, thereby achieving the same goal via consistency in the delivery of information). The updates also address the provision of Braille on tactile signs by maintaining the requirement for Braille underneath text, but relaxing the requirement for Braille that is specific to raised pictograms (and instead providing guidance in an image and a note on how to address signs with both text and pictograms).
- **Tactile walking surface indicators** (NBC Sentence 3.3.1.19.(1)): applies to the geometry and colour of these indicators; the 2023 edition of the standard largely adds explanatory material. The only apparent change to technical requirements is the removal of the relaxation on luminance contrast with the adjacent surface for these indicators when yellow. Luminance contrast was 40% in the 2018 edition and increases to 50% in the 2023 edition to align with other colours of these indicators. Optional guidance on the optimal colour of yellow to use in these indicators is also provided in the 2023 edition.

As well, the term "luminance (colour) contrast" is used consistently in CSA/ASC B651:23, as opposed to "colour contrast" in CSA B651-18.

Several Code change requests have been received recommending the alignment of the NBC with the 2023 edition of CSA B651. These updates are not yet part of the current proposed change, but can be given greater and more timely consideration with the simplification of the NBC framework.

PROPOSED CHANGE

[3.3.1.19.] 3.3.1.19. Tactile Attention Indicators

- [1] 1)** Except as provided in Sentence (2), tactile attention indicators complying with Clauses 4.43.5.3.1, 4.43.5.3.3 and 4.43.5.3.4 of CSA/ASC B651:23, "Accessible design for the built environment", shall be installed
- [a] a) at the top of *flights* of stairs that are unenclosed, and
 - [b] b) at drop-off edges with a change in elevation greater than 300 mm that are unprotected by a *guard*.
- (See Note A-3.3.1.19.(1).)

[3.8.2.10.] 3.8.2.10. Signs and Indicators

Note A-3.8.2.10.(5) Location of Tactile Direction Indicators.

Designers are encouraged to refer to CSA/ASC B651:23, "Accessible design for the built environment", for recommended locations for tactile direction indicators.

[3.8.3.1.] 3.8.3.1. Design Standards

[1] 1) *Buildings* or parts thereof and facilities that are required to be *barrier-free* shall be designed in accordance with this Subsection. [\(See Note A-3.8.3.1.\(1\)-2030.\)](#)

~~[a] a) this Subsection, or~~

~~[b] b) the provisions of CSA B651, "Accessible design for the built environment", listed in Table 3.8.3.1., in their entirety.~~

~~(See Note A-3.8.3.1.(1).)~~

**Table ~~[3.8.3.1.] 3.8.3.1.~~
Barrier-free Design Provisions
Forming Part of Sentence ~~[3.8.3.1.] 3.8.3.1.([1] 1)~~**

~~Barrier-free Application (Code References)~~	~~Applicable CSA B651 Provisions~~
~~Interior accessible routes (3.8.3.2.)~~	~~4.3 and 5.1~~
~~Exterior accessible routes (3.8.3.3.)~~	~~8.2.1 to 8.2.5 and 8.2.7~~
~~Passenger pickup areas (3.8.3.4.)~~	~~9.3~~
~~Ramps (3.8.3.5.)~~	~~5.3 and 5.5~~
~~Doors and doorways (3.8.3.6.)~~	~~5.2~~
~~Passenger-elevating devices (3.8.3.7.)~~	~~5.6.2~~
~~Operating controls (3.8.3.8.)~~	~~4.2~~
~~Signage (3.8.3.9.)~~	~~4.5 and 9.4.4~~
~~Drinking fountains (3.8.3.10.)~~	~~6.1~~
~~Washroom facilities (3.8.3.12. to 3.8.3.16.)~~	~~6.2 and 6.3~~
~~Bathing facilities (3.8.3.17. and 3.8.3.18.)~~	~~6.5~~
~~Communication (3.8.3.19. and 3.8.3.21.)~~	~~6.6~~
~~Counters (3.8.3.20. and 3.8.3.21.)~~	~~6.7.1~~
~~Spaces in seating areas (3.8.3.22.)~~	~~6.7.3~~

Note A-3.8.3.1.(1)-2030 Barrier-free Design Standards.

[The NBC provisions in Subsection 3.8.3. are minimum requirements. Designers may](#)

wish to consider higher-performance provisions in accessibility standards or guidelines intended for public buildings. ~~Code users who opt to apply the provisions of CSA B651, "Accessible design for the built environment", listed in Table 3.8.3.1, must do so without exception: they cannot randomly select and apply a mix of provisions from the NBC and that standard.~~

[3.8.3.3.] 3.8.3.3. Exterior Walks

- [1] 1)** Exterior walks that form part of a *barrier-free* path of travel shall
- [a] a) have a slip-resistant, continuous and even surface,
 - [b] b) be not less than 1 600 mm wide,
 - [c] c) have a level area conforming to Clause 3.8.3.5.(1)(c) adjacent to an entrance doorway, and
 - [d] d) be designed in accordance with Clause 8.2.1 of CSA/ASC B651:23, "Accessible design for the built environment",

[3.8.3.9.] 3.8.3.9. Accessible Signs

- [1] 1)** Visual information signs required by Subsections 3.4.5., 3.4.6. and 9.9.11., and 3.8.2.10. shall comply with Clauses 4.65.2, 4.65.3 and 4.65.4 of CSA/ASC B651:23, "Accessible design for the built environment". (See Note A-3.8.3.9.(1) and (2).)
- [2] 2)** Tactile information signs required by Subsections 3.4.5., 3.4.6. and 9.9.11., and Article 3.8.2.10. shall
- [a] a) have Braille and tactile characters in accordance with Clauses 4.65.6.2 and 4.65.6.3 of CSA/ASC B651:23, "Accessible design for the built environment",
 - [b] b) be installed on the wall closest to the latch side of the door or on the nearest wall on the right side of the door, where there is no wall at the latch side, and
 - [c] c) be centred 1 500 mm above the finished floor with the edge of the sign located not more than 300 mm from the door.
- (See Note A-3.8.3.9.(1) and (2).)
- [3] 3)** Signs required by Article 3.8.2.10. shall incorporate the International Symbol of Access or the International Symbol of Access for Hearing Loss and appropriate graphical or textual information that clearly indicates the type of facilities available. (See Note A-3.8.3.9.(3).)
- [4] 4)** Tactile direction indicators referred to in Sentence 3.8.2.10.(5) shall comply with Clauses 4.43.5.4.1, 4.43.5.4.3 and 4.43.5.4.4 of CSA/ASC B651:23, "Accessible design for the built environment".

Impact analysis

Simplification of NBC Subsection 3.8.3.

Impact on compliance and enforcement: The proposed change is expected to simplify compliance with and enforcement of Subsection 3.8.3. by providing a single list of minimum requirements. The importance of simplicity and clarity in what constitutes the minimum is expected to increase in future years as accessibility requirements expand in the Codes, which would be facilitated by the simplified NBC framework in Subsection 3.8.3.

Impact on accessibility: The proposed change would not substantively impact the current minimum performance level of the current accessibility requirements in Subsection 3.8.3., which are relatively aligned with CSA B651-18. A benefit is that removing this pathway option would make it easier to develop new requirements and update specific requirements in the NBC in a targeted way, without being constrained to aligning with CSA B651 in its entirety and without introducing minimum requirements that do not match in the dual-pathway system. Simplifying the framework to a single set of requirements would also make it easier to consider additional standards as relevant to the NBC, such as the emerging publications by Accessibility Standards Canada.

Designers could continue to voluntarily follow CSA B651:23 and meet or surpass most minimum NBC requirements for accessibility.

Impact on the provinces and territories: The proposed change would align the NBC structure with that of the codes in Alberta and Ontario, which do not include the dual pathway that appears in NBC Subsection 3.8.3. By simplifying the targeted alignment of NBC requirements with specific CSA/ASC B651:23 requirements, it may be easier to harmonize aspects of the codes across Canada because individual requirements can be analyzed for their impacts in individual geographic regions.

Relevant updates to the remaining provisions that specifically reference CSA B651-18

The proposed change also proposes to update the CSA B651-18 edition to CSA/ASC B651:23, where it is directly referenced in the NBC pathway, for some requirements for exterior walks, signage and tactile direction indicators. Most of the differences between the two editions of the standard are related to additional explanatory material and images that will ultimately improve understanding and simplify compliance for designers, manufacturers and builders aiming to comply with the NBC, as well as for building officials in charge of enforcement. There are minor technical differences, largely related to removing redundant requirements for signage, clarifying the application of exterior path requirements to plazas, and improving the luminance contrast requirements for tactile walking surface indicators that are yellow.

Future proposed changes to the NBC may aim to align with CSA/ASC B651:23, where justified, as minimum requirements.

Enforcement implications

By proposing only one “minimum” pathway in NBC Subsection 3.8.3., this proposed change reduces the number of different requirements that building officials need to be aware of and would make it easier for building officials to verify compliance.

Who is affected

Designers and builders would more easily be able to identify and comply with minimum NBC requirements (and continue to voluntarily comply with CSA/ASC B651:23 and/or exceed NBC minimum requirements should they choose to).

Building officials would more easily be able to identify and enforce the minimum requirements in the NBC.

Supporting Document(s)

[Supporting Document for PCF 2192
\(supporting_document_for_pcf_2192_2026-10-14.pdf\)](#)

OBJECTIVE-BASED ANALYSIS OF NEW OR CHANGED PROVISIONS

- [\[3.3.1.19.\]](#) 3.3.1.19. ([\[1\]](#) 1) [F30-OS3.1]
- [\[3.8.2.10.\]](#) 3.8.2.10. ([\[1\]](#) 1) [F74-OA2]
- [\[3.8.2.10.\]](#) 3.8.2.10. ([\[1\]](#) 1) no attributions
- [\[3.8.2.10.\]](#) 3.8.2.10. ([\[2\]](#) 2) [F74-OA2]
- [\[3.8.2.10.\]](#) 3.8.2.10. ([\[3\]](#) 3) [F74-OA2]
- [\[3.8.2.10.\]](#) 3.8.2.10. ([\[3\]](#) 3) no attributions
- [\[3.8.2.10.\]](#) 3.8.2.10. ([\[4\]](#) 4) [F74-OA2]
- [\[3.8.2.10.\]](#) 3.8.2.10. ([\[4\]](#) 4) no attributions
- [\[3.8.2.10.\]](#) 3.8.2.10. ([\[5\]](#) 5) no attributions
- [\[3.8.3.1.\]](#) 3.8.3.1. ([\[1\]](#) 1) no attributions
- [\[3.8.3.3.\]](#) 3.8.3.3. ([\[1\]](#) 1) ([\[a\]](#) a) [F73-OA1]
- [\[3.8.3.3.\]](#) 3.8.3.3. ([\[1\]](#) 1) ([\[a\]](#) a) [F30-OS3.1]
- [\[3.8.3.3.\]](#) 3.8.3.3. ([\[1\]](#) 1) ([\[b\]](#) b) [F73-OA1]

[3.8.3.3.] 3.8.3.3. ([1] 1) ([c] c)

[3.8.3.3.] 3.8.3.3. ([1] 1) ([d] d) [F30-OS3.1]

[3.8.3.9.] 3.8.3.9. ([1] 1) [F74-OA2]

[3.8.3.9.] 3.8.3.9. ([1] 1) [F73-OA1]

[3.8.3.9.] 3.8.3.9. ([2] 2) [F74-OA2]

[3.8.3.9.] 3.8.3.9. ([2] 2) [F73-OA1]

[3.8.3.9.] 3.8.3.9. ([3] 3) [F74-OA2]

[3.8.3.9.] 3.8.3.9. ([3] 3) [F73-OA1]

[3.8.3.9.] 3.8.3.9. ([4] 4) [F74-OA2]