Notes to Part 1

Compliance

A-1.1.1.1.(1) Application of this Code. This Code applies to buildings and facilities, whether occupied or vacant. For the purposes of Sentence 1.1.1.1.(1), the term "facilities" is used in its broadest sense to include all premises that are not included in the definition of "building" in this Code, such as outdoor and underground areas, structures and equipment. Such "facilities" are often associated with storage, distribution and manufacturing activities.

The BCFC contains references to the British Columbia Building Code (BCBC) for the design, construction and installation of many fire protection features. Some BCBC requirements are most readily applied to new buildings and their retroactive application to existing situations as prescribed by this Code could result in some difficulty in achieving compliance. It is the intent of the BCFC that an equivalent level of safety be achieved rather than necessarily achieving strict conformance to the BCBC. The application of this Code to the upgrading of existing facilities should be based on the judgment of the enforcement authority, who must deal with each case on its own merits.

The BCFC states that the owner or the owner's authorized agent is responsible for carrying out the provisions of the Code (see Article 2.2.1.1. of Division C). However, the owner is expected to communicate with the authority having jurisdiction, who is in a position to assess the relative significance of variances from the BCBC requirements. Such authority may then determine that upgrading measures are not necessary, on the basis that the existing arrangement represents an equivalent level of fire and life safety. The BCFC presumes that the adopting legislation provides for the exercise of the necessary discretionary judgment on the part of the enforcing officials, along with appropriate rights to appeal (see Note A-2.2. of Division C). See also Note A-2.1.3.1.(1) of Division B and Note A-1.1.1.1.(1) of Division A of the BCBC.

A-1.2.1.1.(1)(a) Code Compliance via Acceptable Solutions. If a building design (e.g. material, component, assembly or system) can be shown to meet all provisions of the applicable acceptable solutions in Division B (e.g. it complies with the applicable provisions of a referenced standard), it is deemed to have satisfied the objectives and functional statements linked to those provisions and thus to have complied with that part of the Code. In fact, if it can be determined that a design meets all the applicable acceptable solutions in Division B, there is no need to consult the objectives and functional statements in Division A to determine its compliance.

A-1.2.1.1.(1)(b) Code Compliance via Alternative Solutions. Where a design differs from the acceptable solutions in Division B, then it should be treated as an "alternative solution." A proponent of an alternative solution must demonstrate that the alternative solution addresses the same issues as the applicable acceptable solutions in Division B and their attributed objectives and functional statements. However, because the objectives and functional statements are entirely qualitative, demonstrating compliance with them in isolation is not possible. Therefore, Clause 1.2.1.1.(1)(b) identifies the principle that Division B establishes the quantitative performance targets that alternative solutions must meet. In many cases, these targets are not defined very precisely by the acceptable solutions – certainly far less precisely than would be the case with a true performance code, which would have quantitative performance targets and prescribed methods of performance measurement for all aspects of building performance. Nevertheless, Clause 1.2.1.1.(1)(b) makes it clear that an effort must be made to demonstrate that an alternative solution will perform as well as a design that would satisfy the applicable acceptable solutions in Division B – not "well enough" but "as well as."

In this sense, it is Division B that defines the boundaries between acceptable risks and the "unacceptable" risks referred to in the statements of the Code's objectives, i.e. the risk remaining once the applicable acceptable solutions in Division B have been implemented represents the residual level of risk deemed to be acceptable by the broad base of Canadians who have taken part in the consensus process used to develop the Code.

Level of Performance

Where Division B offers a choice between several possible designs, it is likely that these designs may not all provide exactly the same level of performance. Among a number of possible designs satisfying acceptable solutions in Division B, the design providing the lowest level of performance should generally be considered to establish the minimum acceptable level of performance to be used in evaluating alternative solutions for compliance with the Code.

Sometimes a single design will be used as an alternative solution to several sets of acceptable solutions in Division B. In this case, the level of performance required of the alternative solution should be at least equivalent to the overall level of performance established by all the applicable sets of acceptable solutions taken as a whole.

Each provision in Division B has been analyzed to determine what it is intended to achieve. The resultant intent statements clarify what undesirable results each provision seeks to preclude. These statements are not a legal component of the Code, but are advisory in nature, and can help Code users establish performance targets for alternative solutions. They are published as part of the online Code subscriptions and as a separate electronic document entitled "Supplement to the NFC 2015: Intent Statements," which is available on NRC's Web site.

Areas of Performance

A subset of the acceptable solutions in Division B may establish criteria for particular types of designs (e.g. certain types of materials, components, assemblies, or systems). Often such subsets of acceptable solutions are all attributed to the same objective: Fire Safety for example. In some cases, the designs that are normally used to satisfy this subset of acceptable solutions might also provide some benefits that could be related to some other objective: Fire Protection of the Building or Facility for example. However, if none of the applicable acceptable solutions are linked to Objective OP1, Fire Protection of the Building or Facility, it is not necessary that alternative solutions proposed to replace these acceptable solutions provide a similar benefit related to Fire Protection of the Building or Facility. In other words, the acceptable solutions in Division B establish acceptable levels of performance for compliance with the Code only in those areas defined by the objectives and functional statements attributed to the acceptable solutions.

Applicable Acceptable Solutions

In demonstrating that an alternative solution will perform as well as a design that would satisfy the applicable acceptable solutions in Division B, its evaluation should not be limited to comparison with the acceptable solutions to which an alternative is proposed. It is possible that acceptable solutions elsewhere in the Code also apply. The proposed alternative solution may be shown to perform as well as the most apparent acceptable solution, which it is replacing, but may not perform as well as other relevant acceptable solutions. For example, the use of sprinklers to protect the exterior wall of a building may permit combustible materials to be stored closer to that wall than otherwise permitted by the Code, but the proximity of the stored materials to the wall may contravene firefighter access provisions elsewhere in the Code. All applicable acceptable solutions should be taken into consideration in demonstrating the compliance of an alternative solution.

A-1.4.1.2.(1) Defined Terms.

Care Occupancy

Support services rendered by or through care facility management refer to services provided by the organization that is responsible for the care for a period exceeding 24 consecutive hours. They do not refer to services provided by residents of dwelling units or suites, or to services arranged directly by residents of dwelling units or suites with outside agencies.

In the context of care occupancies, these services may include a daily assessment of the resident's functioning, awareness of their whereabouts, the making of appointments for residents and reminding them of those appointments, the ability and readiness to intervene if a crisis arises for a resident, supervision in areas of nutrition or medication, and provision of transient medical services. Services may also include activities of daily living such as bathing, dressing, feeding, and assistance in the use of washroom facilities, etc. No actual treatment is provided by or through care facility management.

Dangerous Goods

In previous editions of the BCFC, the terminology used to identify dangerous goods came from TC SOR/2008-34, "Transportation of Dangerous Goods Regulations (TDGR)." The TDGR apply solely to the adequate identification of hazards related to dangerous goods in the contexts of transportation and emergency response.

Dangerous goods in the workplace are identified in accordance with the "Workplace Hazardous Materials Information System (WHMIS)," established in accordance with the Hazardous Products Act. The WHMIS identification system is specifically designed with the users of the product in mind.

This edition of the BCFC identifies dangerous goods as products regulated by the TDGR or classified under the WHMIS. In order to harmonize these two nomenclatures for dangerous goods, class descriptors were developed taking into consideration both the TDGR and WHMIS classification systems. The nomenclature introduces a descriptive approach to classifying dangerous goods, which is similar to the one proposed by the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) developed by the United Nations (UN). Canada has actively participated in the development of the GHS and has committed to its implementation through the TDGR and WHMIS regulations.

The BCFC 2018 nomenclature takes a common sense approach that corresponds more closely to how people refer to dangerous goods on a daily basis, blending TDGR and WHMIS terminology without using non-descript numbers and letters as previously found in the BCFC, TDGR and WHMIS.

Table A-1.4.1.2.(1)
UN, TDGR, WHMIS and BCFC Class Descriptors for Dangerous Goods

UN	TDGR	WHMIS	BCBC
1	Explosives	Explosives	Explosives
2	Gases	Gases under pressure	Compressed gases
2.1	Flammable gases	Flammable gases; Flammable aerosols	Flammable gases; Flammable aerosols
2.2	Non-flammable, non-toxic gases	Gases under pressure	Non-flammable, non-toxic gases
2.2 (5.1)	–	Oxidizing gases	Oxidizing gases
2.3	Toxic gases	–	Toxic gases
3	Flammable liquids	Flammable liquids	Flammable liquids
4.1	Flammable solids	Flammable solids	Flammable solids
4.2	Substances liable to spontaneous combustion	Pyrophoric liquids; Pyrophoric solids	Pyrophoric materials
4.3	Water-reactive substances	Substances and mixtures which, in contact with water, emit flammable gases	Water-reactive substances
5.1	Oxidizing substances	Oxidizing liquids; Oxidizing solids	Oxidizers
5.2	Organic peroxides	Organic peroxides	Organic peroxides
6.1	Toxic substances	(1)	Toxic substances
6.2	Infectious substances	(1)	Infectious materials
7	Radioactive materials	Not covered by GHS	Radioactive materials
8	Corrosives	(2)	Corrosives
9	Miscellaneous products, substances, or organisms	(2)	Miscellaneous dangerous goods
–	–	Previously Class F	Dangerously reactive materials

Notes to Table A-1.4.1.2.(1):

(1) The WHMIS has various descriptors for this Class of products based on their toxicity.

(2) The WHMIS has various descriptors for this Class of products based on the nature of the danger presented by the product.

Exit

Exits include doors or doorways leading directly into an exit stair or directly to the outside. In the case of an exit leading to a separate building, exits also include vestibules, walkways, bridges or balconies.

Fire-Resistance Rating

Since it is not practicable to measure the fire resistance of constructions in situ, they must be evaluated under some agreed test conditions. A specified fire-resistance rating is not necessarily the actual time that the assembly would endure in situ in a building fire, but is that which the particular construction must meet under the specified methods of test.

Fire Separation

A fire separation may or may not have a fire-resistance rating.

Grade

Localized depressions that need not be considered in the determination of the elevation of grade include such features as vehicle and pedestrian entrances and other minor depressions that do not affect accessibility for firefighting or evacuation.

Individual Storage Area

The width of subsidiary aisles providing access to stored products within an individual storage area may be determined by material handling methods, or other criteria such as minimum width for access to exits or fire protection equipment.

Service Room

Typical examples of service rooms include boiler rooms, furnace rooms, incinerator rooms, garbage handling rooms and rooms to accommodate air-conditioning or heating appliances, pumps, compressors and electrical equipment. Rooms such as elevator machine rooms and common laundry rooms are not considered to be service rooms.

Suite

Tenancy in the context of the term "suite" applies to both rental and ownership tenure. In a condominium arrangement, for example, dwelling units are considered separate suites even though they are individually owned. In order to be of complementary use, a series of rooms that constitute a suite must be in reasonably close proximity to each other and have access to each other either directly by means of a common doorway or indirectly by a corridor, vestibule or other similar arrangement.

The term "suite" does not apply to rooms such as service rooms, common laundry rooms and common recreational rooms that are not leased or under a separate tenure in the context of the Code. Similarly, the term "suite" is not normally applied in the context of buildings such as schools and hospitals, since the entire building is under a single tenure. However, a room that is individually rented is considered a suite. A warehousing unit in a mini-warehouse is a suite. A rented room in a nursing home could be considered as a suite if the room was under a separate tenure. A hospital bedroom on the other hand is not considered to be under a separate tenure, since the patient has little control of that space, even though he pays the hospital a per diem rate for the privilege of using the hospital facilities, which include the sleeping areas.

For certain requirements in the BCBC, the expression "room or suite" is used (e.g., travel distance). This means that the requirement applies within the rooms of suites as well as to the suite itself and to rooms that may be located outside the suite. In other places the expression "suite, and rooms not located within a suite" is used (e.g., for the installation of smoke and heat detectors). This means that the requirement applies to individual suites as defined, but not to each room within the suite. The rooms "not within a suite" would include common laundry rooms, common recreational rooms and service rooms, which are not considered as tenant-occupied space.

Treatment

The ability to evacuate unassisted implies that a person is capable of recognizing and responding to an emergency given their physical, cognitive and behavioural abilities, and able to move to a safe location without the assistance of another person. For example, such persons must be able to arise and walk, or transfer from a bed or chair to a means of mobility, and leave the building or move to a safe location on their own.

Treatment Occupancy

"Treatments" may include such things as surgery, intensive care, and emergency medical intervention. Treatment services differ from the services provided by care occupancies like personal care assistance or the administration of medication, and from those provided by business and personal services occupancies like dentistry or day procedures.

A-1.5.1.1.(1) Application of Referenced Documents. Documents referenced in the BCFC may contain provisions covering a wide range of issues, including issues that are unrelated to the objectives and functional statements stated in Parts 2 and 3 of Division A respectively; e.g. protection of stored products against damage or loss due to fire. Sentence 1.5.1.1.(1) is intended to make it clear that, whereas referencing these documents in the BCFC generally has the effect of making the provisions of those documents part of the Code, provisions that are unrelated to buildings and facilities or to the objectives and functional statements attributed to the provisions in Division B where the document is referenced are excluded.

Furthermore, many documents referenced in the BCFC contain references to other documents, which may also, in turn, refer to other documents. These secondary and tertiary referenced documents may contain provisions that are unrelated to buildings and facilities or to the objectives and functional statements of the BCFC: such provisions – no matter how far down the chain of references they occur – are not included in the intent of Sentence 1.5.1.1.(1).