

Comment Form for Potential Changes for the 2011 Building Code

Indicate change number and make additional copies of this form for each change

A. Respondent Information

Name: Tim Beckett

Title: President/ Fire Chief

I am responding on behalf of: Myself

Organization (specify): Ontario Association of Fire Chiefs

Function: Building Official Builder/Contractor
 Supplier/Manufacturer Designer
 Property Owner/Public Sewage Hauler/Installer
 Other (specify: Public Safety Provider)

Address: 335 Bailey St W. Suite 206

City: Ajax **Province:** Ontario **Postal Code:** L1S 6M2

B. Potential Code Change

Code Change Number: C-01-03-02

Mark one of the following with an "x":

- I support the potential requirements.
- We would support the potential requirements with modifications (describe modifications below).
- I do not support the potential requirements (provide a reason below).

COMMENTS *(Please attach additional sheets as necessary)*

The OAFC opposes exempting pallet racking from requiring a building permit.

I strongly disagree with this proposal as the introduction of a pallet rack system can have a major negative impact on the fire and life safety systems that were originally designed in the building. Sprinkler systems and other life safety systems (exiting, fire alarm audibility, etc.) can be ineffective if not coordinated with such a change to the combustible loading and content configuration in a building.

Without requiring a building permit to be obtained for this work the sprinkler protection and other life safety systems can not be satisfactorily evaluated to ensure the necessary upgrades are made to protect the building and occupants against the inclusion of rack storage into the structure.

Furthermore, it's an opportunity to ensure adequate aisles for fire department access are accounted for in the design of the pallet rack system configuration and the installation meets the storage requirements of the Ontario Fire Code.

I view the addition of the pallet rack system as having a similar impact as changing the occupancy in the building and should be evaluated for the impact that it has on the existing building structure in terms of fire protection and life safety.

Since the construction of a pallet rack system has a potential negative impact on the fire and life safety capacity of the building, such construction should be reviewed at the design phase.

Personal information provided in response to Building Code Consultation is collected under the authority of subsection 38(2) of the Freedom of Information and Protection of Privacy Act, R.S.O. 1990, F.31 for consultative purposes and for contacting you should we need to clarify your response to this consultation. Responses to the consultation (minus addresses, where provided) may be shared with provincial and national building and fire code development committees. Questions about the collection of personal information may be addressed to James Ross, Policy Coordinator, Ministry of Municipal Affairs and Housing, 777 Bay Street, 2nd Floor, Toronto, Ontario, (416) 585-4243 Fax: (416) 585-7531