

Proposed 2023 Ontario Fire Code Amendments: Analysis of Regulatory Impact

The following summary is a preliminary analysis of potential costs. The ministry is seeking feedback on potential costs to inform the regulatory impact assessment that is underway.

No Anticipated Costs:

No substantive costs are anticipated for most of the proposed changes to Division B, which do not introduce new requirements.

Low Potential Costs:

Some proposed changes may incur one-time or minor incremental costs:

- Furniture placement: proposed changes related to furniture placement in certain corridors and lobbies would clarify compliance options for multi-unit residential buildings, care occupancies, and retirement homes. Where existing furniture placement does not meet prescribed options, owners may seek discretionary approval from the chief fire official for existing furniture (no-cost), remove existing furniture (low-cost) or replace furniture (discretionary cost).
- Exit sign and egress door additional maintenance requirements: these proposed changes mainly relate to visual checks.

Medium Potential Costs:

The following proposed changes may result in costs for building owners that would vary based on building size/square footage of impacted areas, and/or complexity of systems:

- Carbon monoxide (CO) alarms and smoke alarm requirements:
 - Installation of CO alarms in care occupancy or retirement home buildings, and additional CO alarms in some residential buildings.
 - Maintenance and testing requirements for CO alarms in care occupancies and retirement homes.
 - Installation of smoke alarms in sleeping rooms of Boarding/ Lodging/Rooming houses (BLRs) and in some areas of certain two-unit residential occupancies.
- Reducing flame-spread rating of interior wall/ceiling finishes in certain areas of some BLRs and two-unit residential occupancies. CFOs have discretionary authority to approve existing materials that provide similar protection. Any new costs could be mitigated by extended compliance time frames. Further, building owners may propose an alternative solution to the chief fire official which, if approved, might reduce costs.
- Testing and maintenance of integrated fire protection and life safety systems installed after January 1, 2020: proposed requirement for an initial test and subsequent tests every five years, to ensure that these systems are operating as intended. Costs would depend on building size and system complexity.

High Potential Costs:

- Indoor storage of dangerous goods and aerosols: costs may be incurred to comply with proposed new requirements if building owners do not meet existing NFC standards or similar best practices on a voluntary basis. Extended compliance time-frames and/or alternative solution provisions could be considered to offset or reduce potential costs.

Potential Future Costs:

Some proposed code changes have no immediate compliance costs, but could lead to potential replacement costs in the future (e.g., when old equipment is replaced), including proposed changes related to:

- Flammable and Combustible Liquids.
- Laboratories.
- Combustible dust producing processes.
- OFC compliance for farm buildings built under proposed new OBC requirements (no costs for owners of existing farm buildings).