



British Columbia Professional Fire Fighters' Association

Fire Chiefs Association of British Columbia



July 24, 2024

Hon. Ravi Kahlon
Minister of Housing and Government House Leader
HOUS.minister@gov.bc.ca

Re: Meeting on Single Egress Stairway

On behalf of the Fire Chiefs Association of BC (FCABC) and the BC Professional Fire Fighters Association (BCPFFA), we would like to thank you for listening to our concerns about the consideration of Single Egress Stairway (SES) in multi-residential buildings.

To capture our discussion, we provided comments on the SES concept, the consultant report, global perspectives, and joint positions among several associations. We particularly focused on the national building code revision process.

The FCABC and BCPFFA agree that affordable housing must be addressed, but not at the expense of fire fighters and occupants' safety. We oppose the introduction of SES in multi-residential buildings and call on federal, provincial, territorial, and municipal governments, as well as the building code community, to ensure that modifying design standards should never compromise fire fighter and public safety.

The FCABC / BCPFFA engaged in a consultation process over two meetings with Jensen Hughes on April 18th and May 17th, 2024.

The FCABC / BCPFFA have both published position papers that express concern that an amendment to the BC Building Code to allow for taller buildings with a single means of egress would hamper fire fighting operations and unnecessarily risk public and fire fighter life safety.

The Jensen Hughes report identifies some of the fire service's concerns. Still, it does not go far enough to highlight the significant risk to life safety if a building code revision were to allow for taller single-use egress buildings in BC.

Summation of our Position

1. The single-egress stairway concept is complex and should be properly evaluated through the **national code change process**.



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2. BC's planned adoption of single-egress stairways is **moving too quickly, does not have supporting data, and does not consider all stakeholder concerns. The latest Canadian data was not considered.** Refer to the [Single Stair Egress Report by Len Garis](#), which is enclosed in our [joint summary](#) of the final consultation report.
3. The **BC Building Code (BCBC)** does not consider or control **other aspects of fire response capacity and building upkeep realities** once a building is completed.
4. **Fires do occur in egress pathways** even with protection systems in place.
5. **BC Fire Code inspections** of apartment buildings show **low compliance rates**.
6. Emerging issues such as **lithium-ion battery fires** make this proposal even riskier.
7. **Human movement research** on evacuations showed a negative impact with a single exit.

Minister Kahlon, we will continue working with the process and provide further feedback on the Building Code discussion document. However, we strongly recommend that this be deferred to the National Building Code revision process with the involvement of the National Research Council.

Yours Truly,

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