March 24, 2026

Chairs, Canadian Board for Harmonized Construction Codes,
Chair, Advisory Council of the Harmonized Construction Codes
Chair, Technical Sub-Group for Single Egress,
1200 Montreal Road, Building M-20
Ottawa, ON K1A 0R6

Dear Chairs, Canadian Board for Harmonized Construction Codes, Advisory Council of the Harmonized Construction Codes and the Technical Sub-Group for Single Egress,

In May 2025, the Canadian Association of Fire Chiefs (CAFC) presented to the single egress task group, outlining the concerns of the fire sector related to single egress construction. With the help of staff, the presentation we gave was analyzed, and we were advised that our presentation contained three categories of information: technical, implementation and policy. We were also advised that the nature of technical, implementation and policy issues needed to be addressed by the appropriate forums.

We are therefore writing to provide each of you with the relevant concerns. It is our advice to the Codes Commission that these issues be considered in tandem to reduce the likelihood of diffuse accountability.

Our presentation identified three problems. The first is the evidence correlating evacuation times and survival. We term this “time is life.” There is extensive literature discussing the relationships between the number of exits, evacuation times, and survival. This is particularly germane in an environment where flashover can occur not only because of the nature of the building but also because of the contents within it. This can include anything from sparklers, which are permitted in Canada, to battery storage systems and electric mobility devices.

The second problem related to fire operations, we term “over-taxing the system.” At this moment in time, there has been a confluence of fire sector pressures, including an increase in climate emergencies, construction fires, complexities of fires and fires in neighbouring buildings, new construction assemblies that have not been tested for fire safety. There are also intersections of risks that have not been considered in single egress, like increased use of lithium-ion batteries, solar panels, hydrogen and green technologies, all of which lead to higher risks of fire.

The third is related to the interpretation of the NFPA standards. Single egress will change the NFPA risk standard of a building, requiring additional firefighters to respond, and training would need to be revised to accommodate single egress, at a time when other risks are emerging. NFPA

standards also provide criteria for the installation of standpipe and hose systems, including size, location and quantity of water needed, which have historically been based on multiple egress stairwells. There has been no known technical review process conducted to analyze the potential impact of adopting the Single Egress approach.

We would like to state upfront that some of the technical concerns that we have are not unique to single egress construction, but would be exacerbated by it. These include flashover, fire behaviour, new construction, combustible materials, deployment, requirements, response time, and NFPA standard interpretation.

Other technical matters unique to single egress include evacuation times, egress behaviour, exit choice, fire in exit, elevators, ingress, and increased risk due to a single point of failure.

In terms of implementation concerns, we would like you to be aware of the effect on municipal resources, firefighter availability, multi-professional response and risk. More details can be found in the attached slides.

Finally, in terms of policy issues we would relate to single egress, we flag for you the training burden that will be imposed by change, intersection of social risks, implications of multi-profession response, and general concerns about where this initiative came from and why the removal of an emergency exit, euphemistically termed as single egress, is being seen as innovation when in our view it is a regression.

There has been little to no evidence presented to us, and we would be interested in better understanding the origin and evidence for considering a change that is viewed as unwelcome, inflammatory and dangerous to first responders and the most vulnerable people in society

We wish to remain on record that this innovation taking place in Canada is unacceptable to the fire sector, and we have made this very clear. We would welcome the opportunity to stand corrected, but have not found a correct interpretation of the evidence that would allow us to do so.

We would invite the opportunity for further conversation and collaboration with you on this in the service of the safety of first responders and all Canadians. We look forward to hearing from you.

Sincerely,

Chief Ken McMullen
CAFC President

Chief Paul Boissonneault
CAFC Building Codes Chair