



Canadian Institute of Plumbing & Heating L'Institut canadien de plomberie et de chauffage

A National Voice With Regional Roots | Une histoire régionale, une voix nationale

February 12, 2021

Mr. James Orr
Director, Building/Fire Codes & Fire Commissioner
Alberta Municipal Affairs
Chair, Provincial Territorial Policy Advisory Committee on Codes (PTPACC)
16th Floor, Commerce Edmonton, Alberta T5J 4L4

SUBJECT: PCF 1581 and PCF 1582 Grab Bars

Dear James,

The Canadian Institute of Plumbing & Heating (CIPH) and Plumbing Manufacturers International (PMI) appreciates this opportunity to share our concerns with PTPACC regarding the development process for the 2020 National Building Code of Canada, specifically proposed changes PCF 1581 and PCF 1582 that would mandate the installation of universal grab bars and/or stanchions for all bathtubs, bathtub/shower combinations and showers in all occupancies.

CIPH and PMI are very opposed to proposed changes PCF 1581 and PCF 1582 going into the 2020 Code for the following reasons:

- The proposed changes will eliminate most of the bathtubs, bathtub/shower combinations and showers in the marketplace, drastically reducing consumer choice. This is because most bathtubs or showers in the marketplace, especially in one- and two-family dwellings, include prefabricated walls that cannot be redesigned due to several factors including wall surface geometry (where the gap between the wall of the fixture and wall framing varies), integrated structural support, or because of the location of features such as built-in shelving.
- Based on data that CIPH and PMI received from manufacturers and wholesalers, the proposed changes could result in an increase of up to 50% in costs to the consumer. This is primarily due to new product needing to be designed, engineered, and certified to meet the new requirements of the proposed changes.
- To CIPH and PMI's knowledge, there is not a bathtub in the marketplace that is designed for the installation of a stanchion into its rim. Installing a stanchion into the rim of a bathtub or bathtub/shower combination in accordance with the proposed changes will void the manufacturer's warranty.
- The proposed changes will break away from all our good works of working together for achieving harmonization under the Canadian Free Trade Agreement. It will create fragmentation as provinces such as Ontario and Nova Scotia currently require for dwelling units that reinforcement be installed for the future installation of grab bars for both bathtubs and showers.
- Many able-bodied people do not need or want unsightly grab bars diminishing the aesthetic appearance of their bathroom. No consumer data has been collected to show that most Canadians are in favor of the proposed changes.
- Industry represented by CIPH and PMI follow the requirements of the Code and make sure that the products manufactured meet or exceed Code requirements. They ensure their products continue to meet any new Code requirements, including these for grab bars. However, this must be done in a meticulous and carefully considered manner through engineering, product development, product standard updates and testing. Of course, this process takes time and, in many cases, it takes years. Therefore, we are very concerned that many manufacturers, especially small to medium-size, will not have the necessary time and resources to make changes to their product lines, especially considering the negative impact that the current pandemic has had on manufacturers.



CIPH and PMI respectfully request that these code changes be considered during the 2025 code cycle.

Thank you for considering our concerns. We look forward to hearing from you. In the meantime, if you have any questions or require additional information, please do not hesitate to contact us.

Yours Sincerely,

Ralph Suppa, CAE
President and General Manager
Canadian Institute of Plumbing & Heating

Matt Sigler
Technical Director
Plumbing Manufacturers International

cc: A. Gribbon Secretary, Canadian Commission on Building and Fire Codes
cc: J. Rogers Building Code Coordinator, Department of Municipal Affairs and Housing



Founded in Montreal in 1933, the CIPH is a not-for-profit trade association that is committed to providing members with the tools for success in today's competitive environment. More than 283 companies are members of this influential Canadian industry association. They are the manufacturers, wholesaler distributors, master distributors, manufacturers' agents, and allied companies who manufacture and distribute plumbing, heating, hydronic, industrial PVF, and waterworks, and other mechanical products. CIPH wholesalers operate more than 700 warehouses and showrooms across Canada. Total industry sales exceed \$6.5 billion annually and CIPH members have more than 20,000 employees from coast to coast.

295 The West Mall, Suite 504, Toronto, ON M9C 4Z4



Plumbing Manufacturers International (PMI) is the trade association of plumbing product manufacturers that produce more than 90 percent of the United States' plumbing products, represent more than 150 iconic brands, and develop safe, reliable and innovative water- efficient plumbing technologies. PMI members contribute more than 464,000 jobs and \$85.5 billion in economic impact to America's economy.

1750 Tysons Boulevard, Suite 1500, McLean, Virginia 22102