



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

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

November 13, 2019

Ms. Anne C. Gribbon, P.Eng.  
Secretary, Canadian Commission on Building and Fire Codes  
National Research Council Canada / Government of Canada  
M-20, 2nd Floor, 1200 Montreal Road, Ottawa, ON K1A 0R6

**SUBJECT: 2020–2025 Code Cycle Areas of Strategic Importance**

Dear Anne,

Thank you for the opportunity for providing CIPH to participate in identifying significant high-level strategic areas of interest deserving consideration by the Commission. CIPH through its Plumbing and Mechanical Advisory Council recommends the following strategic areas:

**Policy priorities:**

- Ample notice should be provided for a meeting date to ensure enough time to plan travel and manage schedules.
- All proposals for change should be available on the NRC website to anyone as soon as possible, within a 30-day time limit.
- Prepare a list of all submitted CCR's with the date received and make the list available to the Standing Committee. Ensure that each new CCR is placed before the committee for consideration at its next meeting.
- Provide a listing of CCRs and how they are being managed, i.e. Working or Task Group, and allow non-members at the discretion of the Standing Committee Chair to participate on Task Groups or Working Groups.
- Recommendations of the committee and proposals for public review should be posted in a timely manner.
- Greater co-operation with Province and Territory codes that have different and/or more appropriate requirements.
- Timely adoption of codes by all jurisdictions within 18 months of publication of the National Model Code to be successful, Code development will need to be responsive to the jurisdiction's needs.
- Review the connections and process between Standing Committees to make sure research or changes that affect different Codes are considered by all affected Standing Committees. Recently this process failed in the working of PCF 1581 and PCF 1582.
- Use more Task Groups for Code work or allow observers on the Working Groups thereby providing more transparency in discussion and ensuring buy-in for a proposal.

**Technical Priorities for the 2020-2025 Code:**

- Water use Efficiency
- Water Re-use
- Water Pipe sizing
- Drain line carry



#### **Technical Priorities for the 2020-2025 Code (cont'd)**

- Adding Heating Plumbing to the NBC technical priority on "Grab Bars for Tubs and Showers"
- Adding Heating Plumbing to the NBC technical priority on "Legionella"
- Climate change initiatives – providing revised plumbing and heating designs for greater efficiencies
- Better definition of potable and drinking water
- Sustainability issues around grey water and black water

#### **Maintenance Priorities:**

- Update the referenced standards in Codes two times per Code cycle.
- Reviewing new standards being developed or even the ORD's being proposed. This approach may help minimize the lag between a new standard being issued and its adoption into the code.
- Presently the Code process tends to react to proposed code changes. The code should try to be proactive and envisage the need for new requirements.
- Revising plumbing designs for greater efficiencies.
- Standing Committee -Heating and Plumbing should have a standing Working Group to review all new standards being proposed, as well as revisions to existing standards with appropriate check lists for both reviews.

Thank you again for the opportunity to provide feedback and we look forward to a formal response to our letter.

Yours Sincerely,  
*Canadian Institute of Plumbing & Heating*

Ralph Suppa, CAE  
President & General Manager

Kevin Ernst  
Chairman, PMAC

cc: Plumbing and Mechanical Advisory Council  
cc: CIPH Board of Directors

C-Memo: C.106.19