



National Research Council Canada

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Comment received

Thank you for submitting a comment on one of the Fall 2019 public review proposed changes. Your submission was successful. Please print this page for your records.

Your Comment

Proposed change: 1582

Support: I do not support this proposed change for the reason(s) stated below.

Reason:

This PCF does not address protection against water ingress, which could result in moisture damage and health issues related to the development of mould.

CHBA BC shares the concerns expressed in the submission from CIPH and PMI regarding warranty: most manufactured bathtubs, bathtub/shower combinations and showers are not designed for grab bar installations. Installing grab bars into manufactured bathtubs, bathtub/shower combinations or showers not designed for grab bars would void the manufacturer's warranty. These warranty issues need to be addressed before this proposed change moves forward. Furthermore, the proposed requirements for grab bars would require significant design changes for manufactured bathtubs and showers enclosures in order to meet the 1.3 kN load requirement, new grab bar dimensions, and protection against water ingress. This will severely limit choice in the market and inflate the cost of eligible models in the immediate future. Sufficient transition time for the industry should be considered in establishing an effective date of this proposed change.

Our members have expressed concerns with the universal 'one-size-fits-all' approach to grab bar placement and finds the proposed change too restrictive. In order to be considered effective design, grab bars need to be installed in locations specific to the actual user and account for how the occupants engage with the built environment. For instance, vertical stanchions may pose as an obstruction for persons with disabilities when transferring to the bathtub. Additionally, for homes designed to meet accessibility needs, grab bar requirements should not conflict with accessibility requirements. For instance, requirements should not conflict with shower control placement so that it does not obstruct the use of the grab bars. More design flexibility is required.

Builders have indicated that clients will not necessarily want grab bars and/or stanchions in their bathrooms. There is a concern that homeowners, particularly for custom homes where design details are scrutinized, would remove grab bars and/or stanchions after occupancy, which would be counterproductive to this proposed change.

Alternatively, CHBA BC proposes a requirement only for blocking to be installed (to resist 1.3 kN load) for accommodating future grab bar installation. This would be a logical first step towards a future possible requirement for grab bars. Further investigation would be required to assess the types of blocking, as well as address bar mounting blocking in manufactured bathtubs, bathtub/shower combinations and showers needs.

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