



August 7, 2024

Honourable Ravi Kahlon,
Minister of Housing
8350 112 Street ,
Delta, BC

Dear Honourable Minister Kahlon,

On behalf of the Canadian Association of Fire Chiefs (CAFC), the national association representing the fire chiefs from the country's 3200 fire departments either through individual membership or through our National Advisory Council representing all provincial, territorial and national affiliate fire chief related organizations, we are writing in regard to British Columbia's consideration of single egress construction. We would like to offer you our advice to defer consideration of this provincial code change proposal, at least until you have the benefit of the federal consultation promised in Federal Budget 2024.

While it is not usually CAFC's practice to intervene in provincial matters, and that provincial building codes are within provincial jurisdiction, your government is moving faster than any other province or territory on this. If a decision is rendered prior to the federal consultation results, it could render a national or federal consultation moot, deny British Columbians of its benefits, and begin a dangerous legacy, given the intention to harmonize codes across the country.

As such, like our colleagues at the Fire Chiefs Association of British Columbia (FCABC) and the Greater Vancouver Fire Chiefs Association (GVFCA), CAFC has serious concerns about this type of construction. To our knowledge, no member of the CAFC or the fire sector, would be prepared to advise any politician, policy maker, builder, or member of the public, to proceed with or purchase single egress construction, given Canada's current housing, climate, fire operations, and other standards. What applies in Europe does not apply here and is even being reconsidered there. International resources and concerns are summarized here: <https://cafc.ca/page/single-egress>.

We also understand that your government is facing a housing crisis and may be incented to submit innovations involving single egress to benefit from federal funding. To help ensure that BC is not disadvantaged, we will be asking the federal government to consider suspending single egress from the fundable innovations anywhere, at least until the federal consultation is complete and reasonable consultation has taken place.

Finally, while we appreciate the report prepared by Jensen Hughes, there are issues in it. Their reference to fire data from the National Fire Information database, which CAFC co-led, is over ten years old and unsuitable for this analysis. The literature review is on the history of single egress rather than fire safety or operational considerations. There may be others.

In closing, we understand and share in the vision of safe and affordable housing for all Canadians. It is the foundation of fire and life safety in Canada. That said, we concur with your province's fire service leaders. More thought is needed on single egress construction.

Thank you again for hosting this consultation and for considering our views. If you would like to speak with us, you may reach us through our Executive Director, Dr. Tina Saryeddine at 613-324-1078 or tsaryeddine@cafc.ca.

Sincerely,



Ken McMullen
CAFC President
Fire Chief, Red Deer, AB

CC: Honourable Premier David Eby
Honourable Sean Fraser, Federal Minister of Housing,
Honourable Dominic Leblanc, Minister of Public Safety, Democratic Institutions and
Intergovernmental Affairs of Canada
Honourable Minister, François-Philippe Champagne, Minister of Innovation, Science, and
Economic Development
CAFC National Advisory Council Members
Secretary of Canadian Board for Harmonized Construction Codes (CBHCC), Mr. Sefton Hyde
Clarke