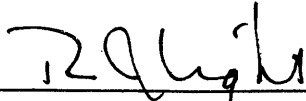


BC BUILDING CODE INTERPRETATION COMMITTEE
AIBC, APEGBC, BOABC, POABC

File No: 06-0028	INTERPRETATION	Page 1 of 2
Interpretation Date:	February 19, 2008	
Building Code Edition:	BC Building Code 2006	
Subject:	Fall hazard from hot tub rim – required guards	
Keywords:	Fall hazard, hot tub, guards, occupied floor surface	
Building Code Reference(s):	3.3.1.18.(1)(c), 9.8.8.1.(1)	
Question:		
<p>1. For the purposes of guard requirements under Sentences 3.3.1.18.(1)(c) and 9.8.8.1.(1), would the raised rim of an open hot tub and / or a raised hot tub with seasonal rigid cover and access stairs be considered a "surface to which access is provided"?</p> <p>2. For the purposes of guard requirements under Sentences 3.3.1.18.(1)(c) and 9.8.8.1.(1), is a hot tub hardwired to a house considered an integral part of the base structure when installed prior to an occupancy permit being granted, or a portable fixture and therefore exempt from the building code application?</p>		
Interpretation:		
<p>1.</p> <p>Considered on its own, a typical privately owned hot tub, similar to a bathtub is not normally contemplated by the building code for guard requirements. The building code addresses certain safety risks in buildings but is not intended to address every conceivable risk. There are often some risks to safety that are deemed acceptable. However hot tubs could conceivably be built into or onto decks in such a way that unacceptable fall hazards can be created, depending on the configuration. If the raised rim of a hot tub forms a climbable surface or surface to which access is provided, in sufficiently close proximity to a deck guard such that the effective guard height is reduced, there would obviously be an unacceptable fall hazard created for occupants. There can be situations where a prudent judgement is called for, in respect to provision of guards to mitigate fall hazards.</p> <p>It is noted that the Vancouver Building Bylaw 2007 Division B Appendix A - A-3.4.6.5.(7) provides some guidance for situations where climbable components or raised surfaces are in close proximity to required guards (see attached excerpts).</p>		
 <hr style="width: 30%; margin: auto;"/>		
R. J. Light, Committee Chair		

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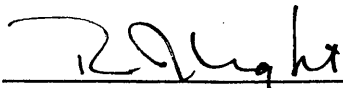
INTERPRETATION

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2.

From most aspects a hot tub is considered a fixture added to the base structure of the building, similar to bathtubs or whirlpools, however the effect of the hot tub in relation to the building needs to be considered; for example in its imposed environmental separation, structural, plumbing and electrical loads. Similarly its implications in relation to surrounding surfaces needs to be considered in the design of guards for the building, even though a hot tub is considered a fixture to the building. Although the Building Code does not explicitly define the hot tub as part of the building for the purposes of applying guard requirements, there could be certain design configurations calling for prudence by considering the hot tub as part of the building structure. Certain design situations can therefore require application of guard requirements.

For hot tubs used by the public, applicable regulations under the Provincial Pools Regulations needs to be reviewed as well.



R. J. Light, Committee Chair