

BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, EGBC, BOABC

File No: 18-0077

INTERPRETATION

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Interpretation Date:	January 19, 2021
Building Code Edition:	BC Building Code 2018
Subject:	Application of CSA B651 for Tactile Walking Surfaces
Keywords:	Tactile Walking Surface Indicators
Building Code Reference(s):	3.8.3.1.(1), 3.8.3.1.(2), 3.8.3.2, 3.8.3.9.(3), Table 3.8.3.1, CSA B651, Division A 1.5.1.2.(1)

Question:

Where an interior accessible route will comply with CSA B651 instead of the BCBC, are the tactile walking surfaces required to comply with CSA B651?

Interpretation:

No.

Clause 3.8.3.1.(1)(b) and Table 3.8.3.1 allows specific accessibility requirements to comply with CSA B651 "Accessible Design for the Built Environment" instead of the applicable BCBC requirements. Sentence 3.8.3.1.(2) requires that each accessible application as listed on a specific line in Table 3.8.3.1 must comply entirely with either the BCBC or CSA B651.

However, the BCBC and CSA B651 are not always aligned in the distribution of requirements within their respective documents. In the BCBC, the requirements for interior accessible routes are in Article 3.8.3.2. The applicable CSA B651 provisions are 4.3 and 5.1, as stated in Table 3.8.3.1. There can be some confusion because the BCBC requirements for tactile walking surfaces are in Article 3.8.3.9, but the CSA B651 requirements for tactile walking surfaces are in provision 4.3.5.

Since 4.3.5 is within 4.3 it would also be applicable to interior accessible routes that comply with CSA B651. However, Table 3.8.3.1 has a different line for the signage and indicators that are described in Article 3.8.3.9. The applicable CSA B651 provisions for signage and indicators are 4.3.5, 4.5 and 9.4. This means that a design where the interior accessible



Patrick Shek, P.Eng., CP, FEC, Committee Chair

The views expressed are the consensus of the joint committee with members representing AIBC, EGBC and BOABC, which form the BC Building Code Interpretation Committee. The Building and Safety Standards Branch, Province of BC and the City of Vancouver participate in the committee's proceedings with respect to interpretations of the BC Building Code. The purpose of the committee is to encourage uniform province wide interpretation of the BC Building Code. These views should not be considered as the official interpretation of legislated requirements based on the BC Building Code, as final responsibility for an interpretation rests with the local *Authority Having Jurisdiction*. The views of the joint committee should not be construed as legal advice.

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routes comply with CSA B651 but the signage and indicators comply with the BCBC would require the tactile walking indicator surfaces described in both B651 4.3.5 and BCBC Article 3.8.3.9. These are different requirements and it would not be logical to apply both sets of requirements.

Division A Sentence 1.5.1.2.(1) of the BCBC states "In case of conflict between the provisions of this Code and those of a referenced document, the provisions of this Code shall govern." The differing requirements for tactile walking surfaces, when both sets of requirements may be applicable, are a conflict between the BCBC and CSA B651. Therefore, in that condition, the BCBC requirements will govern.

Clause 3.8.3.1.(1)(b), which permits the use of specific provisions of CSA B651, states that buildings can be designed in accordance with the applicable provisions of CSA B651. In this case, the tactile walking surface requirements of CSA B651 are not applicable, where they conflict with the BCBC requirements.

It is interpreted that, where a specific accessibility application of the BCBC is addressed in Table 3.8.3.1, that application can individually comply with either the BCBC or CSA B651. For example, because tactile walking surfaces are addressed in BCBC Article 3.8.3.9, they are not required to comply with B651 4.3 which is referenced from BCBC Article 3.8.3.2. The designer can choose whether to follow the BCBC or the CSA B651 requirements.



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