

# BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing  
**AIBC, EGBC, BOABC**

**File No: 18-0138**

**INTERPRETATION**

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Interpretation Date:	November 16, 2021
Building Code Edition:	BC Building Code 2018
Subject:	Accessibility to various levels via elevators
Keywords:	Accessibility, levels, elevators
Building Code Reference(s):	3.8.2.1.(1), 3.8.2.3., 9.5.2.1.(1)

## Question:

A Part 9 three-storey non-residential building is constructed on a sloping site, such that the first storey is at grade with a street at the rear, and the second storey is at grade with a street at the front. The first storey has a mezzanine. All levels are less than 600m<sup>2</sup>.

1. Does the building require an elevator for accessibility?
2. If the first storey with mezzanine is a single suite, is elevator access required to the mezzanine level?

## Interpretation:

1. Yes.  
Sentence 9.5.2.1.(1) requires every Part 9 building to be designed to Section 3.8 for accessibility. Sentence 3.8.2.1.(1) requires accessibility for the building and it is not possible to apply the exception in Clause 3.8.2.1.(1)(g). This building has more than 1 storey above the first storey. The Building Accessibility Handbook 2020 confirms: "This exemption applies to buildings with not more than one storey above the first storey. A building with two or more storeys above the first storey must be fully accessible. Mezzanines that are not considered as storeys for the purposes of determining building height are considered storeys for the purposes of applying Clauses 3.8.2.1.(1)(f) and (g)". Accessibility for floor areas at various levels of buildings is typically achieved by means of elevators. This does not preclude other acceptable methods of achieving accessibility.
2. Yes, unless exemption conditions are met.  
For a suite with a mezzanine, accessibility is not required for the mezzanine if the exemption criteria in Clause 3.8.2.1.(1)(f) can be met as follows:
  - i) less than 600 m<sup>2</sup> in floor area,
  - ii) contains only facilities that are also contained on the accessible storey,
  - iii) does not contain an assembly major occupancy with an area more than 100m<sup>2</sup>, and
  - iv) is not served by a passenger-elevating device connecting the storey next above or below the accessible storey.



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