

BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, EGBC, BOABC

File No: 18-0158

INTERPRETATION

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Interpretation Date:	June 14, 2022
Building Code Edition:	BC Building Code 2018
Subject:	Door Clearances Within Universal Washroom and Accessible Washroom Stalls
Keywords:	Accessible, Universal Toilet Room
Building Code Reference(s):	3.8.2.8.(3), 3.8.3.6.(11), 3.8.3.11.(1), 3.8.3.12.(1)

Questions:

1. Are the door clearances stated by Sentence 3.8.3.6.(11) applicable to entry doors of universal washrooms?
2. Can the required clearance under an accessible lavatory be included as part of the required latch-side clearance inside a universal washroom?
3. Interpretation 12-0039 states that clearances are not required for doors to an accessible stall within a multi-stall washroom. However, the Building Accessibility Handbook 2020 shows latch-side clearance at an accessible stall door. Is this now required?

Interpretation:

1. Yes.

Where water closets are required by Subsection 3.7.2, Sentence 3.8.2.8.(3) requires at least one universal washroom conforming to Subsection 3.8.3 either on the entrance storey or in another part of the building with an accessible path of travel, unless the water closets are for dwelling units only.

Sentence 3.8.3.6.(11) states the required clearances at swing doors, which are applicable to doors in an accessible path of travel unless the door has a power operator conforming to Sentence 3.8.3.6.(6). These required clearances include latch-side clearances of at least 600 mm on the pull side of the door and at least 300 mm on the push side of the door.



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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Sentence 3.8.3.12.(1) includes applicable requirements for universal washrooms, including that the door must comply with Article 3.8.3.6. There are no waivers or other requirements stating that the door clearances of Sentence 3.8.3.6.(11) are not applicable to universal washroom doors. The requirements are applicable regardless of whether the door has a self-closing device.

2. No.

Sentence 3.8.3.6.(11) requires the clear and level space of the latch-side clearance to extend the height of the doorway. As a result, protrusions such as a lavatory are not permitted into the required latch-side clearance. This was a new requirement in the BCBC 2018 that was not in previous BCBC editions.

3. No.

On the “pull side” of a door, Sentence 3.8.3.6.(11) requires a clear and level space at least 1500 mm by the width of the door with an additional latch-side space of at least 600 mm. On the “push side”, Sentence 3.8.3.6.(11) requires a clear and level space at least 1200 mm deep by the width of the door with an additional latch-side space of at least 300 mm.

Sentence 3.8.3.11.(1) provides the required dimensions for accessible water closet stalls. The BCBC does not clearly state that these supersede the requirements of Sentence 3.8.3.6.(11) but the clearances required by Sentence 3.8.3.6.(11) exceed some of the dimensions required by Sentence 3.8.3.11.(1), which would make parts of Sentence 3.8.3.11.(1) redundant. For example, Sentence 3.8.3.11.(1) requires a stall to be at least 1500 mm by 1500 mm, but a stall of this dimension is too small to comply with Sentence 3.8.3.6.(11) because the water closet would protrude into the required clear and level space.

Sentence 3.8.3.11.(1) contains specific requirements for a 1500 mm by 1500 mm clear space in front of the accessible stall, and requires the door to be aligned with either the transfer space beside the water closet or with a clear space at least 1500 mm by 1500 mm within the stall. Also, the requirements of Sentence 3.8.3.11.(1) for offset door pulls, which are not a requirement for any other door in an accessible path of travel, allow easier door opening. Figure 3.8.3.11.-B in the Building Accessibility Handbook



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2020 shows how a disabled person can access a water closet, where the water closet protrudes into the clear and level space stated by Sentence 3.8.3.6.(11), and without the interior latch-side clearance required by Sentence 3.8.3.6.(11).

Based on the requirements of Sentence 3.8.3.11.(1), the door clearances stated in Sentence 3.8.3.6.(11) are not required for doors to accessible stalls. Although not required, it is recommended to provide 300 mm latch-side clearance inside the stall, on the push side of the stall door, to improve accessibility.



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