

BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, EGBC, BOABC

File No: 18-0206

INTERPRETATION

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Interpretation Date: December 13, 2022

Building Code Edition: BC Building Code 2018

Subject: Permanent Label

Keywords: Permanent, Label, Markings, Manufacturer identification

Building Code Reference(s): 9.7.4.2.(1)(b)

Question:

Clause 9.7.4.2.(1)(b) references CSA A440S1, "Canadian Supplement to AAMA/WDMA/CSA 101/I.S.2/A440, NAFS – North American Fenestration Standard/Specification for Windows, Doors, and Skylights". This Supplement has a requirement under reference 6.4.1 for a permanent marking of manufacturer identification. Some manufacturers provide this permanent marking via the National Fenestration Rating Council (NFRC) product labeling requirements as per NFRC 700 Reference 6.

1. What is considered a "permanent" marking or label?
2. Is the NFRC label considered permanent if it is a paper adhesive label that cannot be removed without destroying it?
3. Does the NFRC permanent label (or a temporary removable but not reusable label) provide compliance when the manufacturer identity is included on it?

Interpretation:

1. There are a few documents that can be used for guidance.

Guidelines for the labelling and promotion of Energy Star certified fenestration products sold in Canada for example, states on p 4 and 8: "The permanent label or mark is placed in a location normally hidden from view but easily accessible. On a non-operable product, the permanent label may be made from clear label stock and affixed to a location out of the direct line of view such as the top corner of the glass."

NAFS Labeling Guidelines for Canada by Fenestration Canada

CSA A440S1 Reference 6.4.1 requires that all fenestration products bear a permanent marking indicating the manufacturer's identity in a location that is visible when the product is installed.



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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Reference 6.4.2 further indicates that this requirement is commonly met in either of the following ways:

- An etching or marking on the product frame, hardware or glass
- A label that is not intended for removal without destroying or defacing the label and commonly referred to as a “permanent label”.

The permanent label is intended to be a long-lasting identification of manufacturer and description of the fenestration product. When windows are newly installed, they contain both the temporary label and permanent label. The temporary label is usually a sticker placed on the glass pane. The temporary label is to remain in place until the building inspector has reviewed the content of the label; the contractor can then remove the temporary label.

The permanent labels are usually installed in places not directly visible. For example, the permanent label may be applied on the bottom side of the sash; or on a fixed window, a clear label on the top corners of the glass (out of sight). These permanent labels should be difficult to remove. They are also typically located such that occupants do not normally see the labels.

The guidelines are clear as to the content to be included on the marking or label.

2. Yes.

[NAFS Labeling Guidelines for Canada by Fenestration Canada](#) indicates a label that is not intended for removal without destroying or defacing the label and commonly referred to as a “permanent label”.

3. Yes.

The NFRC permanent label (or a temporary removable but not reusable label) provides compliance when the manufacturer identity is included on it. The guidelines set out other additional information required to be shown on the label. Refer to the guidelines mentioned in item 1.



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