

# BC BUILDING CODE INTERPRETATION COMMITTEE

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

**File No: 24-0038**

**INTERPRETATION**

**Page 1 of 2**

Interpretation Date: August 13, 2024

Building Code Edition: BC Building Code 2024

Subject: Separation of Suites in a House having a Suite without a Kitchen

Keywords: Secondary Suite, house, suite separation

Building Code Reference(s): 9.10.9.16.(1), (2) and (4)

## Question:

The basement of a house is finished with sleeping accommodation but no kitchen and is used by the building owner for occasional sleeping accommodation. The floor above is finished and occupied by another tenant. There is no interior connection between the two levels. Is a fire separation required between the two floor levels?

## Interpretation:

Yes.

Sentence 9.10.9.16.(1) requires a 45 min fire separation between suites in residential occupancies, with exceptions.

One of the exceptions is Sentence 9.10.9.16.(2) for sleeping rooms in boarding or lodging houses where the sleeping rooms form part of the proprietor's residence and do not contain kitchens. Since the owner does not live in the floor above it cannot be considered as the proprietor's residence. Also, a typical boarding or lodging house has common areas and a common kitchen. In this case, the two floor areas are entirely separate with no common areas, so they do not constitute a boarding or lodging house where the sleeping rooms in the basement do not form part of the proprietor's residence.

The other exception is Sentence 9.10.9.16.(4), separation of secondary suite. Secondary suite is defined as "self-contained dwelling unit..." and dwelling unit is defined as "a suite operated as a housekeeping unit ... and usually containing cooking, eating, living, sleeping,



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.

# BC BUILDING CODE INTERPRETATION COMMITTEE

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

**File No: 24-0038**

**INTERPRETATION**

**Page 2 of 2**

and sanitary facilities". Although the basement is not finished as a typical secondary suite with a kitchen, it should be considered as such because it is used for sleeping accommodation by the owner that is different from the tenant on the upper floor.

Therefore, the floor assembly between the two units is subject to the fire separation requirements of Sentence 9.10.9.16.(4) for a house with a secondary suite. The required fire-resistance rating is 0 h, 15 min, 30 min, or 45 min depending on the applicable conditions, as stated in that Sentence.



---

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.