# BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing

**AIBC, EGBC, BOABC**



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| Interpretation Date: | November 18, 2025 |
| Building Code Edition: | BC Building Code 2024, Book I: General |
| Subject: | Height of a Window in a Townhouse |
| Keywords: | Egress; means of escape; windowsill |
| Building Code Reference(s): | 9.9.9.1.(2) |

**Question(s):**

An openable window forming part of a larger window unit is located above a fixed window that extends to the floor. The windowsill is at floor level, but the horizontal mullion between the fixed window and openable window is 900 mm above the floor. Is the maximum windowsill height of 7 m from grade permitted to be measured to the sill of the fixed window at the floor level?

No, as this arrangement is not consistent with the intent of the Code.

The provisions of Sentence 9.9.9.1.(2) are intended to provide for the potential escape of a person from storeys above the first storey in multi-story dwelling units of detached, semi-detached, or row housing. The Users' Guide to Part 9 of the National Building Code of Canada (NBCC) identifies that this window is intended to be "*located close enough to the ground to allow an occupant to escape without serious injury.*" While it might commonly be expected that the window is intended to facilitate rescue by responding firefighters, the Users' Guide to the NBCC does not explicitly identify an expectation that an occupant should expect or have the ability to safely wait for firefighters to rescue them from the window required by Sentence 9.9.9.1.(2).

This is also reflected the intent statements of the 2020 NBCC for Sentence 9.9.9.1.(2), which clarify the intent for a window design that will *"…limit the probability that persons will be unable to egress from the floor level through the window in an emergency situation, which could lead to delays in the evacuation or movement of persons to a safe place…*"

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

While it is likely to expect that a fire department might attempt a rescue where it is feasible, some fire departments have identified that they will generally avoid breaking windows as it is highly undesirable for variety of reasons. This could include the potential for injury from falling glazing, broken glass or window components, reduced the structural integrity of the window assemblies, or creating additional ventilation which could affect the nature of the fire, among other concerns.

It should be noted that in the terminology of windows, that the window refers to the whole of the glazed assembly and framing elements. The upper openable portion referred to in this question, is but a single sash or frame in that window assembly. However, measurement to the bottom of the inoperable portion of the window is not consistent with expected use of the window as a means of escape as this could place the operable portion of the window used for escape at any height above the adjacent ground, which is neither consistent with use for egress or rescue.

As such, it is interpreted that the maximum height of the window required by Sentence 9.9.9.1.(2) **should apply to the transom (or mullion) directly below the openable window**, as this is the height from which an occupant would have to drop to a lower level in order to escape, or to which a ladder would need to reach in the event that a rescue could be attempted. This general intent is also observed in this illustration from the Users' Guide.

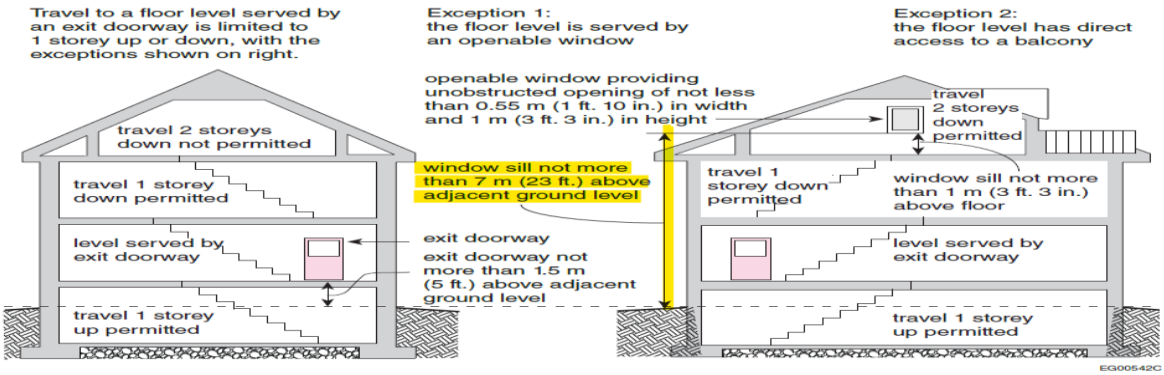


**Figure 9.9.-12**
**Travel limits to exits or egress doors for dwelling units with more than one storey**

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