

BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, EGBC, BOABC

File No: 24-0140

INTERPRETATION

Page 1 of 2

Interpretation Date:	December 16, 2025
Building Code Edition:	BC Building Code 2024
Subject:	Fire-Resistance Rating (FRR) of the first-floor assembly in a building on stilts
Keywords:	FRR, fire separation, first floor
Building Code Reference(s):	3.1.7.3.(1), 3.2.2.7.(2), 3.2.2.9.(2), 3.2.2.52.(2)(a), (3) & (4)

Questions:

If a 4-storey residential building is constructed on stilts where the entire building is raised above the earth below, does the first-floor assembly require to be constructed as a fire separation with a fire-resistance rating?

Interpretation:

Yes (with one exception)

Clause 3.2.2.52.(2)(a) requires all floor assemblies in a 4-storey residential building be constructed as a fire separation with a 1-hour FRR. The only exceptions to that requirement are Sentences 3.2.2.52.(3) & (4) which deal with floors that are entirely contained within multi-level dwelling units. Since neither of these exceptions apply to this situation, the requirements of Clause 3.2.2.52.(2)(a) applies.

Sentence 3.2.2.7.(2) addresses major occupancy separations but does not waive the requirements of Article 3.2.2.52.

Sentence 3.1.7.3.(1) states that floor assemblies shall be rated for exposure to a fire on the underside. The raised first floor of this building could be exposed to an exterior fire beneath the floor assembly.

Sentence 3.2.2.9.(2) waives the requirement for both a fire separation and a FRR for a floor assembly immediately above a crawl space where the height from the ground to the lowest part of the floor assembly is not more than 1.8 m.



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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Page 2 of 2

Although this could apply to an open space beneath a building with no perimeter walls around the crawl space, the hazard of an exterior fire beneath the building is the same if the height of the crawlspace is less than or more than 1.8 m. In such cases, it would be prudent to retain the FRR and fire separation of the Level 1 floor assembly.

It should be noted that bearing walls and columns supporting the Level 1 floor assembly require a 1-hour FRR to match the FRR of the building above.



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