# IAFF POSITION STATEMENT ON SINGLE-EXIT RESIDENTIAL BUILDINGS

Recent efforts in provincial legislatures aim to circumvent the National Code processes and remove important safety design features from multi-story residential buildings. Currently, the Canadian National Building Code requires two exits in residential buildings greater than three stories. If proponents are successful, residential buildings could be permitted to include only a single exit in a residential structure greater than three stories. These proposals will decrease critical life-safety components of future dwellings and, in emergency situations, will require all building occupants to escape through a single stairwell – the same stairwell fire fighters would need to use upon arrival.

The International Association of Fire Fighters (IAFF) is concerned these efforts are short-sighted and dangerous to the public and responding fire fighters. It is imperative that the adverse consequences of a decrease in life-safety design are fully considered by decision makers. While we understand and support the urgent need for additional affordable housing, the IAFF also believes that all housing must be safe housing. The removal of two exits – a critical safety design feature – is not an acceptable trade-off for additional housing.

These are life and death issues that should be addressed through the consensus code process, not through legislative action that bypasses technical review and evaluation. Proponents refer to these efforts as a "Single-Stair Initiative," but the IAFF believes a more accurate term is "Single-Exit" or "One Way Out." The more accurate terminology is as dangerous as it sounds.

There are several issues that warrant further consideration.

## CIRCUMVENTION OF NATIONAL CODE PROCESS

Proponents of the One-Way-Out proposal have bypassed the long-standing national code process. The Canadian Building Code is a consensus-based process that, while not perfect, follows internationally established protocols to ensure fairness, technical review, and informed debate to develop the actual code language. Bypassing this process to introduce legislation that eliminates a long-standing safety requirement of two exits ignores the hard-learned lessons from previous tragedies.

## NO EGRESS RESEARCH

Proponents have not produced research on the impact of adding additional floors on the effective egress of a residential building. They have also failed to analyze the effects on fire department operations and occupant evacuation.

## INTERNATIONAL COMPARATIVES

Proponents of the One-Way-Out cite other nations as examples to suggest that North American building and fire codes may be too restrictive. North America's approach, however, has successfully reduced fire fatalities in residential buildings, especially multi-family structures. Why would we reverse this progress? When do fire deaths become unacceptable? How would we retrofit buildings built under these reduced safety standards to protect occupants in unsafe buildings? The proponents are also using these comparisons as equal without accounting for differences in building materials, the reliability of statistical reporting in nations, the human factor of public education, and local legal requirements.

## RELIANCE ON BUILDING SYSTEMS

Proponents of the One-Way-Out changes emphasize the reliability of building systems to protect occupants

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over the life of the building. Fire protection systems – passive (fire containment), active (fire sprinkler systems) and fire alarm systems – are vital, especially in residential occupancies. In most cases, building owners and managers are diligent in the maintenance of these systems. The IAFF is concerned when these systems are not maintained.

British Columbia commissioned an independent consultant, Jensen Hughes, to conduct a Risk Score for Exit Facilities. In evaluating key components, they rated the specific requirement, probability of failure, and potential severity in assigning a risk score. The results pose great concern.

- A Risk Score was assigned:
  - 10 – 20 Unacceptable
  - 6 – 9 Acceptable short-term
  - 1–5 Acceptable with management review
- In the evaluation of the Integrity of Egress Facilities, the analysis determined that, "The failure of the fire rated construction integrity may result from poor maintenance and inspections during the lifetime of the building." The report found the probability of failure to be "Probable" with the potential severity listed as "Catastrophic," resulting in a Risk Score of 16 – unacceptable.
- Inspections and maintenance were evaluated. The report indicated that, "This is the most critical component in ensuring that facilities and systems perform to the required design and intent enabling safe passage for occupants during fire emergencies as well as providing access for emergency personnel to undertake firefighting and rescue operations." The probability of failure was determined to be "Probable" and potential severity is rated as "Critical," leading to a Risk Score of 12 – also unacceptable.
- The proponents offer no pathway for or advocacy for improved inspection and maintenance of these occupancies. This will require local jurisdictions to evaluate and invest in stringent inspection and enforcement policies to ensure protection systems are maintained for the life of the building.

## EXTERIOR RESCUE

Proponents of One-Way-Out have argued the occupants will evacuate before the fire department arrives, dismissing substantial documented incidents of people being trapped in residential buildings under current safety requirements. Alternatives – such as window evacuations – pose a substantial risk to occupants and fire fighters.

- Ladder operations are among the riskiest tactics fire fighters. While trained professionals practice these maneuvers regularly, they remain dangerous, with injuries and fatalities occurring even under ideal conditions.
- This strategy also assumes that ladder placement will effectively reach upper windows. Ground ladders are not viable above the third floor, necessitating the use of aerial devices. Access challenges, such as parked cars, alleys, dumpsters, and even the building's layout (location of the window on the building – e.g. is it front facing, in the rear of the structure, etc.) could all hinder rescue efforts. Current efforts to reduce roadway widths may also further complicate access.
- Any operation on a ladder or aerial device with untrained citizens is high risk and last resort.

The IAFF supports efforts to expand affordable housing but believes that safety must not be compromised. Citizens that lack financial means should not be subjected to reduced safety standards.

We oppose efforts to permit One-Way-Out buildings, and strongly urge all legislative bodies to defer these initiatives to the National Building Code processes, where safety and design issues can be thoroughly evaluated. The safety of building inhabitants and emergency responders cannot be compromised and any efforts to do so must be rejected.