



**Department of
Building and Housing**
Te Tari Kaupapa Whare

Consultation on proposed changes to the Building Code for backcountry huts

Closing date for public comment: 23 June 2008





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Contents

Consultation on proposed changes to the Building Code for backcountry huts	1
Closing date for public comment: 23 June 2008	1
How to comment	4
Official Information Act	4
General reasons for the proposals	6
Summary of changes	8
Background	8
Options	9
Option 1 – Status Quo	9
Option 2 – Use the determination process to resolve disputes	9
Option 3 – Amend the Building Code only	9
Option 4 – Amend the Building Code and publish a specific backcountry hut Compliance Document (Preferred option)	9
Costs and benefits	10
Costs	10
Proposed transitional arrangements	10
Proposed Changes to the Building Code Clause: A1 Classified Uses and A2 Interpretation	10
A1 Classified Uses	10
A2 Interpretation	12
Backcountry hut definition	12
Proposed Changes to the Building Code clause: C3 Spread of Fire	14
Proposed Changes to the Building Code clause: D1 Access Routes	15
Proposed Changes to the Building Code clause: F6 Visibility in Escape Routes	16
Proposed Changes to the Building Code Clause: F7 Warning Systems	17
F7 Warning Systems	17
Proposed Changes to the Building Code Clause: G1 Personal Hygiene	18
G1 Personal hygiene	18
Proposed Changes to the Building Code Clause: G8 Artificial Light	19
G8 Artificial light	19
Proposed Changes to the Building Code Clause: G12 Water Supplies	20
G12 Water supplies	20

Request for comment

The Department of Building and Housing (the Department) is seeking your comments on the proposed changes to Building Code clauses that relate to backcountry huts.

We propose changing the definitions and classified building uses in Building Code Clauses:

- A1 Classified Uses
- A2 Interpretation

We propose changing the limits on application to Building Code Clauses:

- C3 Spread of Fire
- D1 Access Routes
- F6 Visibility in Escape Routes
- F7 Warning Systems
- G1 Personal Hygiene
- G8 Artificial Light
- G12 Water Supplies

All submissions received by the Department will be carefully considered before a final decision is made on the proposals in this document.

How to comment

Please submit comments in writing, by fax or by email.

Additional copies of this document can be accessed as a PDF or in MS Word format from the Department's website:

<http://www.dbh.govt.nz/consulting-index.shtml>

or can be obtained by calling the Department on 0800 242 243.

The closing date for submitting comments on the proposed changes is **23 June 2008**.

Please **post** or **courier** comments to:

Consultation feedback – Backcountry huts

Department of Building and Housing -Building Standards

Level 6, 86 Customhouse Quay

PO Box 10 729,

Wellington

Or **email** comments to comments@dbh.govt.nz with 'Consultation feedback – Backcountry huts' in the subject line.

Or **fax** to (04) 494 0290, marked 'Consultation feedback – Backcountry huts'.

Official Information Act

Please note that all responses will be public information. Responses may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding



**Department of
Building and Housing**
Te Tari Kaupapa Whare

specific information contained in their submission, such as that the information is commercially sensitive or that they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

General reasons for the proposals

The Department of Conservation (DOC) manages more than 950 huts for use by trampers, climbers, and hunters (either New Zealanders or international visitors), and DOC staff. The majority of huts are located in the backcountry – remote, mountainous locations that are not serviced by formed roads (some do not even have tracks to them) and often require specialised experience and equipment to access. Most backcountry huts have basic facilities and provide essential shelter only.

Huts are a long-established feature of the New Zealand outdoors, with the first being built over a century ago. Many have been in place for decades and have been used by generations of domestic and foreign visitors alike. They are a major asset for New Zealanders that allows our backcountry to be enjoyed more fully. They are a unique component of New Zealand's cultural identity.

Although users of huts may have varying degrees of ability and experience, they are expected to reach these huts, or to undertake activities from them, on foot, or by boat, and to be of reasonable fitness. Users carry their own provisions and equipment with them, and are expected to be self-sufficient in carrying out their activities. They will normally stay one night before moving on.

User expectations of huts are different to those of other buildings. Tramping, climbing and hunting are activities which, among other things, provide recreation, self-reliance, physical challenge and exercise, the opportunity to 'get away from civilisation' and to commune with nature, and the social experience of a trip with others. To enhance the experience sought, instead of diminishing it, only a rudimentary level of services and facilities, including communal style living and sleeping, is expected by users. Indeed many trampers, climbers and hunters choose not to use huts, or to use them only when the weather is poor.

As an example of the rudimentary level of services and facilities provided, the water supply of many huts is obtained from the roof or a nearby water course or body. The Department of Conservation does not and cannot guarantee this water to be potable. Backcountry hut users understand and accept this, and choose to boil the water, to use water purification equipment, otherwise to treat it or to drink it as it comes.

Due to the lack of vehicle access, the remoteness, and the terrain in which these huts are located, people with disabilities who are unable to walk (e.g., those requiring a wheelchair) are not expected to visit or use these huts. Therefore only those people with disabilities who retain a reasonable degree of mobility and agility can be expected to visit and use these huts. There is no accessible route to these huts.

Because of their intended use, remote locations, severe climates, difficult access for visitors and maintenance, backcountry huts do not easily align with existing Building Code provisions.

DOC has an active programme of hut maintenance, replacement and construction. This task means they have to work with building consent authorities across New Zealand. However, the inflexibility of the Building Code on backcountry huts, as well as inconsistencies between building consent authorities on how the Building Code is interpreted, have increasingly led to consenting problems in areas such as accessibility, sanitation and fire protection.

In the next twenty years, many backcountry huts will be due for replacement. To ensure consenting processes do not interfere with this task, and to ensure the construction of new huts provides the required level of safety and amenity consistent with their intended use, the Department of Building and Housing and the Department of Conservation have together



**Department of
Building and Housing**
Te Tari Kaupapa Whare

developed a set of proposals to amend the Building Code and, following on from this at a later date, the Compliance Documents.

Summary of changes

Changes are proposed to the following Building Code Clauses:

- A1 Classified Uses
- A2 Interpretation
- C3 Spread of Fire
- D1 Access Routes
- F6 Visibility in Escape Routes
- F7 Warning Systems
- G1 Personal Hygiene
- G8 Artificial Light
- G12 Water Supplies.

The changes will:

- define backcountry hut
- identify the building classification (classified use) for backcountry huts
- create new limits on application in the Building Code so that, where appropriate, backcountry huts do not have to meet the same standards as buildings in developed areas
- enable backcountry huts to be built to comply with the Building Code and satisfy their intended use.

Background

This consultation document proposes initiatives to improve the building consenting process for backcountry huts by clarifying the New Zealand Building Code provisions that should not apply to backcountry huts.

The New Zealand Building Code

The Building Code sets the performance requirements for buildings but does not prescribe how these are to be achieved. For those people who prefer specific information, Compliance Documents issued by the Department of Building and Housing, provide detailed methods for establishing compliance with the Building Code.

Compliance Documents include Acceptable Solutions and Verifications Methods. Acceptable Solutions are examples of materials, components and construction methods that, if used or followed, would ensure compliance with the Building Code. Verification Methods are calculation methods or test methods to ensure compliance with the Building Code.

This consultation document proposes changes to the Building Code.

The Department also proposes to issue a Compliance Document that relates to the construction of backcountry huts. However, this Compliance Document will be consulted on separately and at a later date from the changes to the Building Code.

Options

Option 1 – Status Quo

The current system for building backcountry huts often involves extended negotiations with building consent authorities over Building Code compliance, particularly for features required for fire fighter use, access, emergency lighting, smoke alarms, toilets, artificial light and water supplies. In effect, waivers are required to enable backcountry huts to be built to meet their intended use. These negotiations cause delays to construction, increases in cost and, in some cases, inappropriate facilities being provided for the users of backcountry huts.

There is confusion over whether backcountry huts fall within the Building Code category of *Housing* or *Communal Residential (Community Service)*, and hence which Building Code provisions should be amended to clarify the building use of backcountry huts.

Leaving the status quo in place would not address these problems.

Option 2 – Use the determination process to resolve disputes

The determination process could be used to resolve disputes over Building Code compliance for each proposed hut where DOC and the building consent authority can not agree.

However, this approach would not address the existing conflicts in the Building Code. Determinations only apply to a specific building, and the process would potentially have to be repeated for each hut.

Option 3 – Amend the Building Code only

Amending the Building Code, as outlined in this document, would greatly assist designers, DOC and building consent authorities in the design, construction and consenting of backcountry huts. This option could be enhanced by having a backcountry hut Compliance Document to help achieve Building Code compliance.

Option 4 – Amend the Building Code and publish a specific backcountry hut Compliance Document (Preferred option)

Changing the Building Code and publishing a backcountry hut Compliance Document gives the clearest and the best option for establishing compliance for backcountry huts. It also minimises costs and prevents inconsistencies between building consent authorities.

Costs and benefits

Costs

The costs of the proposal are minor and are limited to developing and publishing the updated Building Code Clauses and Compliance Document. The only users of the proposed Compliance Document would be the Department of Conservation and building consent authorities.

Benefits

The Department of Conservation would benefit from certainty and efficiency of compliance processes, resulting in a quicker consenting process for building or replacing backcountry huts. Building consent authorities would also find it easier to be satisfied regarding Building Code compliance and be more consistent in their application across the country. It is anticipated that the saving will be in the order of 5% to 10% of the construction cost.

Building Code changes for backcountry huts will reflect the expectation of hut users.

Proposed transitional arrangements

The Building Code Clause changes would take effect 28 days from the making of the regulations.

While a longer transitional period could be sought, it is better to have the Building Code changes come into effect quickly. This would facilitate the development of the Compliance Document and the construction of some backcountry huts by complying directly with the amended Building code.

The transitional arrangements for the backcountry hut Compliance Document will be included in the separate consultation for that document.

Question 1: Do you agree with the proposed transitional arrangement?

Strongly Somewhat Not really Definitely not No opinion

Your comments on the transitional arrangement:

[Comments]

Proposed Changes to the Building Code Clause: A1 Classified Uses and A2 Interpretation

A1 Classified Uses

The Department is proposing to clarify the classified use of backcountry huts as Communal Residential, Community Service by adding backcountry hut to list of examples of community



service buildings. A definition of backcountry hut will be included in the definitions in Building Code Clause A2 Interpretation.

CURRENT TEXT	PROPOSED CHANGES
A1 Classified Uses	A1 Classified Uses
<p>3.0 COMMUNAL RESIDENTIAL</p> <p>3.0.1 Applies to <i>buildings</i> or use where assistance or care is extended to the <i>principal users</i>. There are two types.</p> <p>3.0.2 Community Service Applies to a residential <i>building</i> or use where limited assistance or care is extended to the <i>principal users</i>. Examples: a boarding house, hall of residence, holiday cabin, hostel, hotel, motel, nurses' home, retirement village, time-share accommodation, a work camp, or camping ground.</p>	<p>3.0 COMMUNAL RESIDENTIAL</p> <p>3.0.1 Applies to <i>buildings</i> or use where assistance or care is extended to the <i>principal users</i>. There are two types.</p> <p>3.0.2 Community Service Applies to a residential <i>building</i> or use where limited assistance or care is extended to the <i>principal users</i>. Examples: a boarding house, hall of residence, holiday cabin, hostel, hotel, motel, nurses' home, retirement village, time-share accommodation, a work camp, camping ground, or backcountry hut.</p> <p>Reason: Changed to clearly identify where backcountry huts fit within the classified uses.</p>

Question 2: To what extent do you agree with the proposed change to the Building Code Clause A1 Classified Uses?

Strongly Somewhat Not really Definitely not No opinion

Your comments on the proposed change to the Building Code Clause A1 Classified Uses:

[Comments]



A2 Interpretation

The Department is proposing to include a definition for backcountry huts in Building Code Clause A2 Interpretation, which is used in Clause A1 Classified Uses and is proposed to be used in the limits on application to Building Code clauses C3, D1, F6, F7, G1, G8 and G12.

Backcountry hut definition

Definition

“**Backcountry Hut**” is a building that:

1. is located on land held for conservation purposes under the Conservation Act [and other Department of Conservation administered Acts], and,
2. is available for use by backcountry users and is intended to provide overnight shelter with only basic facilities, and
3. is not on an *accessible route* and,
4. is intended to sleep no more than 65 persons.

Explanation

This proposed definition has been developed to define what a backcountry hut is. All parts of the definition have to be complied with.

This part of the definition limits the Building Code amendment to huts built on land owned or managed by Department of Conservation.

This part of the definition is to identify that not all the provisions of the Building Code need apply to backcountry huts due to their intended use.

This part of the definition is about both the location of the huts (often in remote locations with difficult access) and the necessary attributes of the users.

DOC has many buildings, such as visitor centres and road-end facilities, which are not in the backcountry. These have to comply with the existing Building Code provisions.

The building requirements for backcountry huts are based upon access by people who can reach a backcountry hut, and this is described fully in the ‘General reasons for the proposals’ on page 5. This does not preclude people being assisted to reach and use backcountry huts, but features such as ramps and accessible toilets will not be provided.

This part of the definition is to ensure that the risks associated with large building populations are adequately covered.

CURRENT TEXT

A2 Interpretation

No existing definition

PROPOSED CHANGES

Add new definition for backcountry huts.

“**Backcountry Hut**” is a building that is:

- a) is located on land held for conservation purposes under the



- b) Conservation Act [and other Department of Conservation administered Acts], and, is available for use by backcountry users and is intended to provide overnight shelter with only basic facilities, and,
- c) is not on an *accessible route* and,
- d) is intended to sleep no more than 65 persons.

Existing Definition

Accessible route An access route usable by people with disabilities. It shall be a continuous route that can be negotiated unaided by a wheelchair user. The route shall extend from street boundary or car parking area to those spaces within the building required to be accessible to enable people with disabilities to carry out normal activities and processes within the building.

Reason: New definition required for use in the changes to Building Code Clauses A1, C3, D1, F6, F7, G1, G8 and G12.

No change proposed to the existing definition

Accessible route An access route usable by people with disabilities. It shall be a continuous route that can be negotiated unaided by a wheelchair user. The route shall extend from street boundary or car parking area to those spaces within the building required to be accessible to enable people with disabilities to carry out normal activities and processes within the building.

Question 3: To what extent do you agree with the proposed new definition for Building Code Clause A2 Interpretation?

- Support it
- Support but with changes described below
- Oppose with reasons described below

Your comments on the proposed new definition for Building Code Clause A2 Interpretation:

[Comments]



Proposed Changes to the Building Code clause: C3 Spread of Fire

Because backcountry huts cannot be reached in time by fire fighters in the event of fire, the Department is proposing to amend the Building Code so that features required for use by fire fighters, such as fire hydrants, would not be required.

CURRENT TEXT	PROPOSED CHANGES
<p>Performance</p> <p>C3.3.9 The <i>fire safety systems</i> installed shall facilitate the specific needs of fire service personnel to:</p> <p>(a) Carry out rescue operations, and</p> <p>(b) Control the spread of <i>fire</i>.</p>	<p>Performance</p> <p>No change to the performance.</p> <p>Add a new Limit on application:</p> <p>Limit on application Performance C3.3.9 shall not apply to <i>Backcountry huts</i>.</p>

<p>Question 4: To what extent do you agree with the proposed changes to the Limit on Application to Building Code clause C3.3.9?</p> <p><input type="checkbox"/> Support it <input type="checkbox"/> Support but with changes described below</p> <p><input type="checkbox"/> Oppose with reasons described below</p> <hr/> <p>Your comments on the proposed change to the Limit on Application to Building Code Clause C3.3.9:</p> <p>[Comments]</p>
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Proposed Changes to the Building Code clause: D1 Access Routes

Access to backcountry huts is usually by walking or climbing over rugged terrain, which may include rocks and boulders, streams and rivers, uneven ground and through dense vegetation. It is therefore reasonable to expect that backcountry hut users will be able to negotiate easily any steps leading into the hut.

Therefore, for the proposed new building definition “backcountry huts”, the Department is proposing to remove the Building Code requirement that there be at least one accessible route to a building. The huts would not need to have ramps or other features for those who are unable to walk.

We are also taking the opportunity to align the limit on application with the building uses in Schedule 2 of the Building Act 2004 by removing reference to Outbuildings and Ancillary Buildings.

CURRENT TEXT	PROPOSED CHANGES
<p>Performance D1.3.2 At least one <i>access route</i> shall have features to enable <i>people with disabilities</i> to:</p> <ul style="list-style-type: none"> a) Approach the <i>building</i> from the street boundary or, where required to be provided, the <i>building car park</i>, b) Have access to the internal space served by the principal access, and c) Have access to and within those spaces where they may be expected to work or visit, or which contains facilities for personal hygiene as required by Clause G1 ‘Personal Hygiene.’ <p>Limits on application Performance D1.3.2 shall not apply to Housing, Outbuildings, Ancillary buildings, and to Industrial buildings, where no more than 10 people are employed.</p>	<p>Performance No change to the performance.</p> <p>Change the Limit on application to: Limit on Application Performance D1.3.2 shall not apply to <i>Housing, Backcountry huts</i>, and to <i>Industrial buildings</i> where no more than 10 people are employed.</p>



Question 5: To what extent do you agree with the proposed changes to the Limit on Application to Building Code clause D1.3.2?

- Support it Support but with changes described below
 Oppose with reasons described below

Your comments on the proposed change to the Limit on Application to Building Code Clause D1.3.2:

[Comments]

Proposed Changes to the Building Code clause: F6 Visibility in Escape Routes

The Department is proposing not to require emergency lighting in backcountry huts.

F6 requires visibility in escape route for all building except those in the Limit on application. Backcountry huts are proposed to be added to the limit on application.

CURRENT TEXT	PROPOSED CHANGES
<p>Functional Requirement F6.2 Specified features in an escape route must be made reasonably visible by lighting systems, other systems, or both, during failure of the main lighting.</p> <p>Limit on Application Requirement F6.2 does not apply to Detached Dwellings, Household Units within Multi-unit Dwellings, Outbuildings or Ancillary buildings.</p>	<p>Functional Requirement No change to the requirement.</p> <p>Change the Limit on application to:</p> <p>Limit on Application Requirement F6.2 shall not apply to <i>Detached Dwellings, Household Units Within Multi-Unit Dwellings, Outbuildings, Ancillary Buildings or Backcountry huts.</i></p>

Question 6: To what extent do you agree with the proposed changes to the Limit on Application to Building Code Clause F6.2?

- Support it Support but with changes described below
 Oppose with reasons described below

Your comments on the Limit on Application to Building Code clause F6.2:

[Comments]

Proposed Changes to the Building Code Clause: F7 Warning Systems

F7 Warning Systems

The Department is proposing to change the Building Code to exempt backcountry huts from requiring warning systems. This is because backcountry huts are small, single storey buildings (the significant majority are a single room of 6 – 35m² in area) with direct access to the outside from every room. In addition, the materials and surface finishes used and the lack of soft furnishings, backcountry huts have a small fire load, and hence are a low risk of fire.

The Department will produce a Compliance Document for backcountry huts that will contain backcountry hut configurations to ensure that likely sources of fire are not located between the sleeping area(s) and the means of escape, and that direct exits are available from sleeping areas.

CURRENT TEXT	PROPOSED CHANGES
<p>Performance F7.3.1 A means of warning must alert people to the emergency in adequate time for them to reach a safe place.</p> <p>Limit on application Performance F7.3 does not apply to Outbuildings, or Ancillary buildings.</p>	<p>Performance No change to the performance.</p> <p>Change the Limit on application to:</p> <p>Limit on application Performance F7.3.1 shall not apply to Outbuildings, Ancillary buildings, or <i>Backcountry huts</i>.</p>

Question 7: To what extent do you agree with the proposed changes to the Limit on Application to Building Code Clause F7.3.1?

- Support it
 Support but with changes described below
- Oppose with reasons described below

Your comments on the proposed Limit on Application to Building Code clause F7.3.1:

[Comments]



Proposed Changes to the Building Code Clause: G1 Personal Hygiene

G1 Personal hygiene

Because a reasonable degree of mobility is required to reach backcountry huts, the Department is proposing that accessible sanitary facilities not be required for backcountry huts.

We are also taking the opportunity to align the limit on application with the building uses in Schedule 2 of the Building Act 2004 by removing reference to Outbuildings and Ancillary Buildings.

CURRENT TEXT	PROPOSED CHANGES
<p>Performance G1.3.4 Personal hygiene facilities provided for <i>people with disabilities</i> shall be <i>accessible</i>.</p> <p>Limit on application Performance G1.3.4 shall not apply to <i>Housing, Outbuildings, Ancillary buildings, and to Industrial buildings</i>, where no more than 10 people are employed.</p>	<p>Performance No change to the performance. Change the Limit on application to:</p> <p>Limit on application Performance G1.3.4 shall not apply to Housing, Backcountry huts, and to Industrial buildings where no more than 10 people are employed.</p>

Question 8: To what extent do you agree with the proposed changes to the Limit on Application to Building Code Clause G1.3.4?

Support it

Support but with changes described below

Oppose with reasons described below

Your comments on the proposed change to the Limit on Application to Building Code Clause G1.3.4:

[Comments]

Proposed Changes to the Building Code Clause: G8 Artificial Light

G8 Artificial light

Requiring artificial light in backcountry huts is problematic because of the need for electricity generation on-site. Generating sources would need regular maintenance, which would be difficult and expensive in remote locations. Backcountry hut users do not expect artificial lighting in huts and carry their own lighting equipment.

Therefore, the Department is proposing to change the Building Code by exempting backcountry huts through the limit on application.

CURRENT TEXT	PROPOSED CHANGES
<p>Functional Requirement</p> <p>G8.2 Spaces within <i>buildings</i> used by people, shall be provided with <i>adequate</i> artificial light which, when activated in the absence of sufficient natural light, will enable safe movement.</p> <p>Limit on application</p> <p>Requirement 8.2 shall apply to:</p> <ul style="list-style-type: none"> a) All <i>exitways</i> in <i>Multi-unit Dwellings, Group Dwellings, and Communal Residential, Communal Non-residential, Commercial and Industrial</i> buildings, b) All <i>access routes</i> except those in <i>Outbuildings, and Ancillary buildings,</i> and c) All common spaces within <i>Multi-unit Dwellings, Group Dwellings, and Communal Residential, Communal Non-residential</i> buildings. 	<p>Functional Requirement</p> <p>No change to the requirement.</p> <p>Change the Limit on application to:</p> <p>Limit on application</p> <p>Requirement 8.2 shall not apply to <i>backcountry huts</i>.</p> <p>Requirement 8.2 shall apply to:</p> <ul style="list-style-type: none"> a) All <i>exitways</i> in <i>Multi-unit Dwellings, Group Dwellings, and Communal Residential, Communal Non-residential, Commercial and Industrial</i> buildings, b) All <i>access routes</i> except those in <i>Outbuildings, and Ancillary buildings,</i> and c) All common spaces within <i>Multi-unit Dwellings, Group Dwellings, and Communal Residential, Communal Non-residential</i> buildings.



Question 9: To what extent do you agree with the proposed changes to the Limit on Application to Building Code Clause G8.2?

- Support it Support but with changes described below
 Oppose with reasons described below

Your comments on the proposed change to the Limit on Application to Building Code Clause G8.2:

[Comments]

Proposed Changes to the Building Code Clause: G12 Water Supplies

G12 Water supplies

Water provided at backcountry huts is either sourced from rainwater collected from the roof of the hut or from a suitable local watercourse. Backcountry users understand the risk and the need to treat, filter or boil the water.

The Building Code currently requires water used for food preparation, utensil washing, drinking and oral hygiene to be potable. The Department is proposing that backcountry huts not require potable water. This is considered acceptable as the Building Code's requirements for signage in clause F8 require the provision of clear signage indicating the potential hazard which in turn will advise user of the need to treat or boil the water they use.

CURRENT TEXT	PROPOSED CHANGES
<p>Performance</p> <p>G12.3.1 Water intended for human consumption, food preparation, utensil washing or oral hygiene must be potable.</p>	<p>Performance</p> <p>No change to the performance.</p> <p>Add the Limit on application: Limit on application Performance G12.3.1 shall not apply to <i>Backcountry huts.</i></p>

Question 10: To what extent do you agree with the proposed changes to the Limit on Application to Building Code Clause G12.3.1?

- Support it Support but with changes described below
 Oppose with reasons described below



Your comments on the proposed Limit on Application to Building Code Clause G12.3.1:

[Comments]