# BUILDING CODE VARIANCE



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#### ALBERTA LABELING FOR CSA A277 CONSTRUCTED HOMES

#### **PURPOSE**

This variance recognizes CSA A277, "Procedure for Certification of Prefabricated Buildings, Modules, and Panels," labels (without accompaniment of an Alberta Municipal Affairs label) for factory-constructed and other off-site-constructed homes as proof of conformance with Part 9 of the National Building Code—2019 Alberta Edition (NBC(AE)).

### DISCUSSION

In light of CSA A277, "Procedure for Certification of Prefabricated Buildings, Modules, and Panels," already being a prescribed requirement in Sentence 2.4.5.1.(2) of Division C of the NBC(AE) for factory-constructed and other off-site-constructed buildings, constructors certified under CSA A277 do not require provincial labels for the homes they produce.

The CSA A277 standard provides the process for an independent certification agency to review the quality system of a constructor and periodically conduct unannounced audits of the constructor's quality system to verify ongoing compliance. Sentence 2.4.5.1.(2) of Division C of the NBC(AE) states that CSA A277 certification confirms "the building complies with the technical requirements, or objectives and functional statements, of this Code."

A factory-constructed building bearing a CSA A277 certification label of an accredited certification agency indicates the building is constructed in compliance with the CSA A277 standard and the building construction is deemed to comply with the NBC(AE).

There is no prescriptive requirement for the Alberta Label for factory-constructed homes; however, the requirement for Alberta Labels on factory-constructed homes has been the normal practice by industry and regulatory stakeholders in addition to the CSA A277 labeling. A variance to provide assurance that factory-constructed homes certified under CSA A277 provide equivalent safety performance to the Alberta Label will be of assistance for both industry and authorities having jurisdiction.

## **CODE REFERENCES**

# Article 2.4.5.1. (Division C) states:

# 2.4.5.1. Factory-Built Assemblies

1) Where a component of a *building* is assembled off the *building* site in such a manner that it cannot be reviewed on site, off-site reviews shall be carried out to determine compliance with this Code.

2) Except as provided in Sentence (3), factory-constructed and other off-site-constructed

Unless stated otherwise, all Code references in this STANDATA are to Division B of the National Building Code-2019
Alberta Edition

Issue of this STANDATA is authorized by the Provincial Building Administrator

[Original Signed]
Paul Chang





buildings that are constructed after 01 April 2019 shall be certified in accordance with CSA A277, "Procedure for Certification of Prefabricated Buildings, Modules, and Panels," by an organization accredited for this purpose by the Standards Council of Canada, to confirm that the building complies with the technical requirements, or objectives and functional statements, of this Code.

# Notes to Part 1, A-1.1.1.(2) states:

In Alberta, a certification and labeling program based on CSA A277, "Procedure for Certification of Prefabricated Buildings, Modules, and Panels," is used for factory-constructed homes. The use of a label issued by Alberta Municipal Affairs confirms compliance with the requirements of Part 9 of the NBC(AE).

The labeling program for factory-constructed homes is a cooperative effort between Alberta Municipal Affairs and third-party certification agencies accredited by the Standards Council of Canada. Third-party certification agencies conduct periodic audits of the manufacturing plants, review the building plans, inform the manufacturer of deficiencies, and distribute labels.

All new factory-constructed homes carry two labels:

- (1) a CSA label to verify that the home was built by a certified manufacturer under a quality assurance program, and
- (2) a provincial label to confirm the home was designed and built to Part 9 of the NBC(AE) as a single-family dwelling.

The provincial labels are only applied to factory-constructed homes that are fully completed in the factory. Unfinished factory-constructed homes sold to owners to be completed on-site do not receive provincial labels. In this situation, only CSA A277 labels are applied and owners must then obtain all necessary permits for the work remaining to be completed.

## **APPLICATION**

This variance applies to any building indicating compliance to the NBC(AE) in accordance to the certification listing of the manufacturer under the CSA A277 program, constructed on or after December 16, 2019.

### VARIANCE

This variance provides approximately equivalent or greater safety performance with respect to persons and property as that provided for by the Safety Codes Act.

- 1. Factory-constructed homes bearing a CSA A277 certification label are considered acceptable verification that the home was designed and built in compliance with Part 9 of the NBC(AE).
- 2. The Alberta-specific label is not required in addition to the CSA A277 certification label and applicable specification sheet.

This VARIANCE is applicable throughout the province of Alberta.