



Code Development Committee Members  
Canadian Board for Harmonized Construction Codes  
Codes.publicreview@nrc-cnrc.gc.ca

April 27, 2024

**RE: Proposed Changes to the National Fire Code (2020) #1807**

Landscape Ontario is an association representing Ontario ornamental horticulture growers, facilitating sales of over \$100M for this sector group alone. The green infrastructure sector is an important contributor to Ontario's economy, generating \$8.6 billion in gross output (revenues), \$4.64 billion in direct gross domestic product (GDP), and directly employing over 80,000 people. Many of our member nursery growers have greenhouse production space for propagation and perennial production, which include horizontal thermal (energy) curtains as well as light diffusion (shade) curtains to efficiently manage heat and light conditions within the greenhouse. Existing curtains in greenhouse structures can last 10-15 years, and up to 20 years with proper maintenance. We fully support investments in our businesses that protect workers and welcome the opportunity to comment on the proposed changes to the National Fire Code of Canada, particularly Proposed Change 1807 related to NFC (2020) Division B 2.3.2.

We are concerned with the lack of engagement with the greenhouse industry. As far as we are aware, no research or communications are available that point to the need to change the exemption for agriculture. The proposed change represents a fundamental shift in how agricultural operations are treated, and we do not support changes that are developed without transparency and consultation. If an exemption for greenhouse agriculture is not maintained, we request that a transition period of at least ten (10) years be implemented to avoid unnecessary financial burden.

Some of our members have recently expanded their greenhouse ranges and have installed the latest technology in energy and light curtains, typically manufactured in Europe. These curtains are sourced to be flame-resistant as required by their insurance policies and meet the European Standard NTA 8825:2018. We request that the Committee revise the wording of the proposed change to accept equivalencies from other jurisdictions. Recognition of equivalent standards (i.e., the harmonization of standards) would support a stronger investment climate for the greenhouse industry in Canada.



We encourage you to reference Flower Canada Growers' submission to this consultative process for additional details on equivalent Standards. We acknowledge the importance of the National Fire Code and are committed to ensuring a safe environment for our workers. However, we would like to reiterate that we have not been consulted through this process and have not been provided with evidence that the revocation of the agricultural exemption is necessary to protect workers. We thank you for considering our comments, and we encourage you to engage with the undersigned for communications related to the National Building and Fire Codes.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping, sweeping lines that suggest the name "Jeanine West".

**Dr. Jeanine West**

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CC: Joe Salemi, Executive Director, Landscape Ontario

CC: Jamie Aalbers, Growers Manager, Canadian Nursery Landscape Association

CC: Landscape Ontario Growers' Sector Group