



March 10, 2022

Ministry of Municipal Affairs and Housing
Building and Development Branch
777 Bay Street, 2nd floor
Toronto, ON M5G 2E5
Submitted by e-mail: buildingcode.consultation@ontario.ca

**Re: Proposed Changes for the Next Edition of Ontario's Building Code (Winter Consultation)
ERO number 019-4974**

Dear Sir or Madam,

Ontario Pork appreciates the opportunity to participate in consultation ERO 019-4974, on the proposed changes for the next edition of the Ontario's Building Code.

As the voice of Ontario's 1,064 pork farmers, and a leader in the agriculture industry, Ontario Pork is committed to sustainable growth in the pork sector, delivering government representation, research investment, and industry improvements in areas including animal care and environmental sustainability, while growing the brand and reputation of producers and their product. Ontario's pork sector represents a significant part of the Canadian economy, combining - from "farm to fork" - \$1.045 billion in GDP, over 15,843 full time jobs and over \$2.8 billion in economic output.

Ontario Pork also provided comments to the Codes Canada consultation in March 2020 and we understand that the Ontario consultations are based on the National Research Council's proposals and drafts of the 2020 National Construction Codes and are not expected to change in content. We would be pleased to provide our National Code consultation submission if that would be of assistance to you.

Below, please find Ontario Pork's comments on the Ontario Building Code consultation.

Section [2.2.6.5.] --- Access to Exits [1] --) The minimum width of an access to exit, including obstructions, shall be 750 mm.

Ontario Pork comments: Many swine barns are constructed 'motel style' with a large central hallway and rooms on each side. Most rooms are equipped with three doorways exiting into the main central hallway – one servicing the central feeding alley – normally 30 – 36 inches wide and two more doors servicing the manure alleys normally to the rear of the pens. The manure alley doors are generally 24 inches wide, or the width of the service alley. Other examples include goat parlour loading lanes, sheep parlour loading lanes and similar loading lanes within the context of a farm building. These lanes are generally around 24" to prevent the smaller livestock from turning around and blocking the directional flow. This could affect greenhouse operations with rows of trenches, tables or similar areas where access to exits is currently less

than 750mm. Minimum access to exits was not a previous code requirement and 750mm appears to be too restrictive.

Ontario Pork suggestion modification: The minimum width of an access to exit, including obstructions, shall be 610 mm.

Section 2.2.6.6 [2] A door that opens into a facility providing access to an exit from a room that is used for a Group G, Division 1 major occupancy without a below-floor storage area for liquid manure shall swing on a vertical axis in the direction of travel to the exit.

Ontario Pork suggested modification: Perimeter doors should be allowed to swing inwards in all low occupancy farm buildings housing livestock.

2.2.8.3. Below-Floor Storage Areas for Liquid Manure

[1] --) Farm buildings with a below-floor storage area for liquid manure shall be provided with ventilation system conforming to Subsection 2.4.2.

[2] --) Where the ventilation system required by Sentence (1) relies on electrical power for normal operation, it shall be provided with an emergency power supply conforming to Sentence (3).

[3] --) the emergency power supply required by Sentence (2) shall be

[a] --) supplied from a generator, batteries or a combination thereof,

[b] --) equipped with audible and visual trouble indicators,

[c] --) capable of operating the trouble indicators for not less than 24 h,

[d] --) capable of operating the ventilation system under full load for not less than 2 h, and

[e] --) designed so that, in the event of a failure of the normal power source to the farm building, there is an immediate automatic transfer to emergency power.

Ontario Pork comments: A majority of farmers provide their farms with portable standby power with on-site farm tractors and PTO driven generators, to provide immediate power to operate ventilation systems. Personnel working in a barn will be immediately aware of a power outage due to lack of lights and the shutdown of barn equipment. The occupants of farm buildings are typically familiar with the building layout and will leave the building quickly and ensure emergency power is connected to supply livestock with suitable air flow. Vulnerable occupants are typically not in farm buildings. Members of the public are typically not in farm buildings.

Ontario Pork suggested modification: Automatic transfer equipment is unnecessary, and portable standby power is quite adequate for low human occupancy farm buildings. This sentence should be revised to remove the work "automatic."

[2.4.2.4.] --- Silos and Grain Storage Bins

[1] --) Where an enclosed tower silo, horizontal silo, or grain storage bin is connected to an adjacent feed room, mechanical exhaust ventilation shall be provided to remove air from the lowest floor level of the feed room to the outdoors at a rate not less than 3 air changes per hour.

[2] --) The ventilation system of the farm building in which the feed room referred to in Sentence (1) is located shall be designed to prevent airflow from the feed room to any other part of the floor area of the farm building.

Ontario Pork comments: Sealing a feed room from the livestock area of a barn is problematic, and adjoining doors are normally open during feeding operations. When personnel are present during feeding operations, with the feed room doors normally open, the ventilation system in the livestock area will overpower any mechanical ventilation system in a feed room. Adequate ventilation should be provided during feed preparation, although airflow need not be restricted from other rooms.

Ontario Pork suggested modifications: Feed rooms are not normally connected to horizontal silos and are usually connected to grain storage bins with enclosed 4 – 6 inch augers. Feed rooms connected to a vertical silo should include a provision for ventilation. Natural ventilation, using opening panels or windows might be a better choice.

Thank you for opportunity to participate in this consultation. Ontario Pork would be pleased to further discuss the issues identified above.

Sincerely,

A handwritten signature in blue ink, reading "John de Bruyn". The signature is fluid and cursive, with the first name "John" being more prominent.

John de Bruyn
Board Chair