Public Review Process for the National Building Code of Canada:
How to submit feedback

Thank you for your interest in the Public Review Process for the National Building Code of Canada, specifically the proposed code change related to the run length of stairs in homes.

The review process is currently open until 4:00 pm EDT on October 31, 2014.

This guide provides a summary of the issue, the process, and some points to consider when submitting your own comments. We hope this tool will help you add your support for changing the building code and creating a safer environment for persons of all ages.

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Questions?

If you have any questions about the process that are not answered here, please contact us!

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Thank you to Alison Novak and Linda Strobl for submitting the content for this guide.
Part I: The Issue

- Our homes (private, single dwelling units) currently permit the run length of stairs to be built 210 mm (or approximately 8 inches) deep and the riser (i.e. step height) to be built 8 inches high.

- In comparison, public buildings permit “7-11” stairs, where the minimum run length is 11 inches (or 280 mm) and the maximum riser height is 7 inches.

- The original change proposed was to align the code and have “7-11” stairs for both private and public dwellings. This was voted on and did not get put through to public review.

- Research shows that an 11 inch run length and a 7 inch riser height will *significantly reduce* falls risk and improve balance (for relevant research sources, see the Appendix).

- A shorter riser and longer step run will also make it easier for older adults and persons with mobility impairments to ascend and descend the stairs safely.

- However, the committees voted to **ONLY change the run length to 10 inches** in private dwellings with no change to the riser height.

- While the change to increase run length is commendable, 10 inches is still not enough to build safer stairs in homes for persons of all ages and those with mobility impairment.

As Public Health professionals, we should support this change but ask the committee to go further and align the standards for public and private dwellings!
Remember: Your comments must be submitted by 4:00 pm EDT on October 31st!

Part II: How to Submit Your Comments

1 Visit the National Research Council Canada website and read the rules!


At the bottom of the page you will see “Five steps for submitting comments on proposed changes”.

At this point you should:

- Review the guidelines and instructions (Steps 1 and 2).
- Review the shortened version of the proposed change we provided as an email attachment (“Proposed Change 843”).

[Note: If you would like to see the full proposed changes document - which includes ALL proposed changes, not just stair dimensions - you can do so through the NRC website (Step 3).]

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### Five step for submitting comments on proposed changes

1. **Step 1:** Read the guidelines for writing comments.
2. **Step 2:** Read the instructions for submitting comments.
3. **Step 3:** Request the proposed changes (including updates to referenced documents).
4. **Step 4:** Complete the on-line Comment Form.

Select and view a proposed change. If you have a comment, fill out the Comment Form and submit it on-line. Only Comment Forms submitted on-line will be accepted.

You may submit other related documents, such as reports, by e-mail, mail or fax.

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**Important:**

Submit one Comment Form per proposed change. If you are commenting on more than one proposed change, use a separate form for each one.

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5. **Step 5:** Read What happens to the comments?

Thank you for contributing to the development of Canada’s National Model Construction Codes.
2 Click on “Complete the on-line Comment Form”

In Section I: Respondent’s Information, you will need to:

- enter your name, address, phone number and email (title and organization are optional)
- check one of the boxes under Function. You will most likely select “Home Owner/General Public”, but choose whatever is most appropriate.
- enter your professional designation in the Other box

![Function (required)](image)

In Section II: Comment, you will need to:

- select “843 - Run of stairs serving single dwelling units” in the Proposed Change dropdown menu
- check one of the following options under the Support heading:
  - I support this proposed change as is.
  - I support this proposed change with the comment(s) and associated reason(s) stated below.

Choose this option to support the change to a 10” run.

Choose this option to support the change, but comment that a 10” run isn’t ideal.
Enter your reasons in your own words!

Enter your comments/rationale for supporting the change in the *Reason* box. Be sure to put it in your own words!

Here are some tips on what to include:

- State your background (healthcare, ergonomics, industry, etc.), level of education, etc. These credentials will lend you authority to speak on the matter at hand.
- Include your reasons for why you have taken the time to respond to the topic.
- Relate your comments to the problem: current stair dimensions are unacceptable, falls on stairs are a major health burden in Canada, and improved dimensions would reduce that burden.
- If you selected “I support this proposed change with the comment(s) and associated reason(s) stated below” in the previous step, write why the change could be better - i.e. an 11” run; “7-11” stairs; or aligning the private and public codes.
- Share examples and real-life stories, for example:
  - Do you work with patients that cannot use stairs because they are too high, place them at risk of falls?
  - Do you know someone who has fallen down stairs in homes that were too high, or steps too short?
- Make sure you support your position with references to supporting research documents. Here are some supporting points you may consider using:
  - Stairs represent 21% of all major injury hospitalizations due to unintentional falls in Canada (Joint Task Group on Step Dimensions, 2013).
  - Falls on stairs account for 25% of deaths related to falls in Canada (Barss, 2012).
  - Evidence shows stairs, particularly residential stairs, are the primary location of falls (Novak, Komisar, Maki & Fernie, 2011).
  - The direct burden of falls on residential stairs in 2012 is estimated at 314 deaths and $476M in healthcare spending (Joint Task Group on Stair Dimensions, 2013).
  - According to the literature, a larger stair run offers “more space for better foot placement, greater margins of stability and a more forgiving configuration for all age groups” (Joint Task Group on Stair Dimensions, 2013).
  - Wright and Roys (2008) demonstrate a correlation between the number of falls occurring in a stair and the dimension of its run.

*For further reading, the Appendix lists research supporting changes to stair dimensions.*

Click “Send Comments” and you are done! Thank you for your support!
Appendix: Research Supporting Changes to Step Dimensions in Homes

- Indicates a document published in the year 2000 or later.
- Hyperlinks are provided for open access documents and are highlighted in purple.

**Laboratory-based studies (or reports based on lab work):**


Field studies:


  http://pediatrics.aappublications.org/content/129/4/721.full.pdf+html

**Other studies related to stair ambulation with inferences to safer stair design:**


