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Determining Compliance of A277-Certified Buildings

The BC Building Code applies the same requirements to site-built and factory-built buildings. However, it can often be difficult to determine whether a factory-built building complies with these requirements once it has been delivered to its installation site because many of the wall, roof and floor assemblies are closed-in and their components cannot be easily inspected.

CSA Standard CAN/CSA-A277, “Procedure for factory certification of buildings,” was developed to address this problem. It describes a procedure whereby an independent certification agency can review the quality control procedures of a factory and make periodic, unannounced inspections of its products and thus, through suitable labeling, provide assurance to authorities at the final site that those components which cannot be inspected on site comply with the code indicated on the label.

Prior to the 2012 edition, the BC Building Code stated that it did not apply to factory-built housing and components that were certified by an accredited agency as complying with CAN/CSA-A277, “Procedure for factory certification of buildings.” This caused confusion because the A277 standard specifically requires compliance with the codes, standards or regulations in force at the final point of installation, such as the BC Building Code. One unintended interpretation was that A277-certified buildings could be built to a code that lists them as exempt, leaving open the suggestion that A277-certified buildings were not required to comply with any building code or standard.

To address this issue, the 2012 BC Building Code did not list an exemption for A277-certified factory-built housing or components. On December 19, 2014 additional changes to the Appendix were made to remove reference to A277 to further resolve the confusion¹.

Despite the changes to the BC Building Code, A277-certified buildings installed in British Columbia² are still required to be designed and built to the BC Building and Plumbing Codes or the separate CAN/CSA-Z240 MH Series, “Mobile Homes” standard.

¹ See bulletin B14-03 Miscellaneous Changes.

² Buildings within the City of Vancouver shall comply with the Vancouver Building Bylaw.

What assurance is available that A277-certified buildings comply with the BC Codes?

CAN/CSA-A277 is not a building code; it is a procedure for certifying compliance of factory-built components with a building code or other standard. If a factory-built building bears a label of an accredited certification agency indicating that compliance with the BC Building Code has been certified using the A277 procedure, it would be practical and reasonable for the accepting authority to rely on the certification label as a means to verify that the construction done in the factory is Code-compliant.

What does the A277 standard cover?

The standard specifies requirements for

- a) certification of the factory quality program;
- b) certification of the built product;
- c) auditing of the factory quality program; and
- d) in-factory inspection of the built product.

What does the A277 standard *not* cover?

The standard does not cover portions of the buildings or services that are not completed in the factory. It does not address the transport of buildings or their erection at the installation site.

Are A277-certified buildings that are designed and built to Z240 MH Series standard exempted from the BC Building Code?

Yes. Portions of the Z240 MH Series of standards on mobile homes resemble a building code. These portions contain requirements in many of the areas where the BC Building Code also has requirements and frequently the requirements are different. Other portions of the Z240 MH standards deal with special requirements for mobile homes related to the fact that these houses are intended to be periodically moved over roads. The BC Building Code considers homes certified to the Z240 MH standard as acceptable housing and they are permitted under Division A Clause 1.1.1.1.(2)(g).

This exemption applies to housing and components that are produced in the factory. Site preparations, which include siting, foundations, and mountings as well as connections to services and installation of appliances, are required to comply with the BC Building Code.

Appendix

Where can I find more information?

The **Building and Safety Standards Branch** published bulletin **B14-03 Miscellaneous Changes** found here:
http://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/construction-industry/building-codes-and-standards/bulletins/b14-03_revisions_to_bcbc.pdf

The **CSA Group** is the standards development organization that published the A277 and Z240 standards. Information can be found by visiting www.csagroup.org.

The **Manufactured Housing Association of British Columbia (MHABC)** is the voice of the manufactured home retailers, builders, transporters and many suppliers providing services within BC. **Contact MHABC** by

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