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Step Codes and CSA Z240 Manufactured Homes

The purpose of this bulletin is to provide clarification about the British Columbia Building Code 2024 (BC Building Code) requirements for energy efficiency and greenhouse gas emissions reduction as they relate to new factory-built homes constructed to the CSA Z240 MH Series, “Manufactured homes,” standard (CSA Z240).

Background

There are two different rule sets factories follow for design and construction of prefabricated homes. Many factories produce products designed and constructed to CSA Z240, which resembles a building code with special requirements for the transport of buildings, modules, and panels, that are not addressed in the provincial or national building codes. The BC building Code exempts buildings constructed to the CSA Z240 Standard, as an acceptable alternative to the BC Building Code. CSA Z240 homes have their own set of requirements via the standard, therefore factory built housing and components complying with this standard are exempt from the BC Building Code in Clause 1.1.1.1.(2)(g) of Division A. The BC Building Code does apply to site preparations for CSA Z240 buildings, which are discussed in the Frequently Asked Questions.

The technical requirements of CSA Z240 are additions or exceptions to the National Building Code of Canada (NBC), and unless the NBC provisions are explicitly modified within the CSA Z240 standard itself, manufactured homes under CSA Z240 are to comply with the NBC.

In addition to the CSA Z240 standard, factories will also follow CSA A277, which specifies factory certification procedures. CSA Z240 is a product standard and CSA A277 is a factory standard. Factories following the CSA A277 “Procedure for certification of prefabricated buildings, modules, and panels” standard have a factory quality program to certify that the prefabricated products produced are designed and constructed to the codes and other regulations in force at the installation location¹. In British Columbia, these include the BC Building Code, the Safety Standards Act and its pursuant regulations, as well as local enactments. Factory-built homes following the BC Building Code comply with the same requirements for energy efficiency and greenhouse gas emissions that apply to site-built homes.

¹ The BC Building Code applies throughout the province except for federal lands and the City of Vancouver.

Energy Performance of Z240 Manufactured Homes

The technical requirements of the BC Building Code, including energy efficiency and greenhouse gas emissions reduction requirements, apply to buildings that are in scope of the BC Building Code. The BC Building Code does not apply to factory-built housing and components complying with CSA Z240, including the BC Building Code's energy efficiency and greenhouse gas emissions reduction requirements.

CSA Z240 offers three options for energy performance. The first is Section 9.36. of Division B of the NBC², the second is the requirements in force at the installation location, and the third is the prescriptive energy requirements in clauses 13.2 to 13.4 of the CSA Z240 standard itself. Since the BC Building Code does not apply to CSA Z240 buildings, the BC Building Code's energy efficiency and greenhouse gas emissions reduction requirements are not a compliance option in BC, however, local government bylaws should be consulted. In the absence of applicable related local bylaws, the owner may choose to comply with NBC or with CSA Z240 clauses 13.2 to 13.4. It should be noted that although the BC Building Code does not apply, other provincial enactments such as the Energy Efficiency Standards Regulation may apply.

At this time, the NBC and the CSA Z240 standard do not have requirements regarding greenhouse gas emissions.

Frequently Asked Questions

Do B.C.'s requirements for protection from overheating apply to manufactured homes built to CSA Z240?

No. Similar to the Step Code, homes built to CSA Z240 are exempt from having to meet the BC Building Code requirement for one living space in a dwelling to be capable of maintaining a 26-degree Celsius design temperature. CSA Z240 does not include the same requirements as the BC Building Code for protection from overheating. Manufactured homes built to CSA Z240 are to have heating and air-conditioning systems designed, constructed, and installed to conform to accepted good engineering practice as described within the standard.

What code/standard applies to site preparations for manufactured homes?

The BC Building Code applies to site preparations and the connection to services and installation of appliances for manufactured homes. 'Site preparations' describes the site-work required to mount the factory portion of the manufactured home at its installation location.

² Section 9.36. of Division B of the NBC outlines a tiered energy approach. Designers choosing this option must meet the minimum requirements although may voluntarily design to higher tiers.

Do the Energy Step Code and the Zero Carbon Step Code apply to site preparations (and connection to services and installation of appliances) of CSA Z240 manufactured homes?

The Energy Step Code and Zero Carbon Step Code were developed to assess whole-building performance and, as such, were not intended to apply to portions of buildings only.