

December 23, 2021

Fire Protection Industry Members

Dear Members,

RE: Fire Sprinkler Permitting Process

As many of you know, earlier this year the City of Vancouver undertook a review of its fire sprinkler permitting process. The City recognizes the critical importance of fire sprinklers to life safety and property protection, and thus, is committed to having a high-quality fire sprinkler permitting process that is timely, efficient, and considers the needs of all stakeholders involved. This commitment, combined with the City's philosophy of continuous improvement and the importance of quality sprinkler system design and installation, is what motivated this holistic review of the fire sprinkler permitting process to identify potential opportunities for enhancement and improvement.

From the outset, the City recognized the importance of soliciting industry input and feedback for inclusion in the review. We believe that enhancing and improving the fire sprinkler permitting process is a shared opportunity that we the regulator can approach in partnership with industry counterparts and the permit applicants. To help achieve that objective, industry stakeholder engagement was seen as critical to this review.

As such, industry stakeholders were engaged through an online survey, as well as a series of live small group discussions as means to collect and consider their valuable input. We would like to thank everyone who participated and shared feedback as part of this review. We are especially grateful to the over 70 industry participants who took time to share candid and constructive feedback via the survey or small group discussions, sometimes both. In the group discussions specifically, everyone that participated brought thoughtful and constructive ideas that contributed to a discussion that was collaborative and generated many helpful insights.

While there was a wide range of views expressed, certain messages were reinforced consistently. These include:

- The City's deep technical knowledge of fire sprinkler systems and relevant codes offers a helpful level of rigour to the review of fire sprinkler plans
- The City's acceptance and early adoption of digital drawings, seals, and stamps has helped to streamline the application process
- Applicants are seeking to reduce the total time (and number of cycles) it can take for permits to be issued from the time of the first submission to approval
- Applicants perceive inconsistencies as to what the City considers required in an application for a permit to be granted
- The occurrence of partial permit application reviews when deficiencies are noted ultimately leads to more re-submissions and review cycles

All the input received during the review was taken into careful consideration in the formulation of recommendations on ways to improve (without changing what is working well) the permit process and the

City is working to formalize and implement solutions that are beneficial for everyone. The changes that we are currently considering range from short- to long-term, so they will be implemented progressively as it is feasible for us to do so.

What follows is a sample of the changes we are considering. We hope this gives you a sense of the direction we are heading, and the type of changes that may be on the horizon.

- Focussing on creating greater transparency around what the City's expectations of permit applications are and how applications perform against this standard
- Improving the clarity and comprehensiveness of information on the City's website
- Improving the access to, and availability of, plan reviewers to answer questions about the feedback provided on submissions
- Evaluating submissions against a standard set of criteria/requirements
- Minimizing the number of resubmissions an application requires

In addition to considering the changes described above, we also expect additional changes to be introduced over time resulting from the rollout of the Professional Governance Act (PGA), and this includes various initiatives authorized under the PGA being implemented by Engineers and Geoscientists BC such as the regulation of firms and enhanced practice standards. These changes will impact both the work of the regulator as well as the work of those preparing applications or their components (e.g., quality management practices in the preparation of technical drawings). Moreover, these changes are expected to impact the work practices and professional oversight of anyone performing regulated activities both within the City and in industry alike. As this rollout of the PGA proceeds, we can expect to have future updates on what these changes might entail.

As stated above, the City is committed to making changes to improve the fire sprinkler permitting process in partnership with all stakeholders. Against this backdrop of introducing changes that are within our control to make, we must also consider the impact of changes being introduced by the PGA. The full set of changes needed to improve our permitting processes cannot happen overnight, so we ask for your patience and continued cooperation as we work to introduce changes.

In the spirit of partnership and maintaining an open dialogue with you as changes are being introduced, we will be hosting a virtual session in early 2022 to discuss the changes we are proposing to make, and the rationale behind them. As stated above, the opportunity to improve the end-to-end fire sprinkler permitting process is a shared opportunity between the City and applicants. As such, we also hope to use that session to discuss opportunities for where the applicant community can improve. We invite you to attend to learn more. We plan to send an invitation in the near future.

Thank you again for your support and contribution to this important review of our fire sprinkler permitting process.

Sincerely,

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