Canada will continue to consult bilaterally with Japan on the revision of its building codes to aid Japan's objective of stimulating improvements in the quality of housing stock and to facilitate Canadian exports of building materials. Specifically, Canada is working to remove further restrictions on wood-frame construction — for example, through revisions to fire codes to ensure that test methods and test criteria are transparent and to allow foreign organizations to become recognized approval bodies.

Removal of Restrictions on Three-Storey Wood Frame Construction

After the 1997 revisions to Japan's building codes, three-storey wood frame construction is now allowed in quasi-fire protection zones (QFP), but is restricted to a maximum of only 1,500 square metres, requires severe property line setbacks and requires limiting distance calculations for exterior wall openings. Overall, these restrictions severely limit the use of three-storey wood construction in QFP. There is also a size limit of 3,000 square metres for non-QFP. Wood cannot be used in the construction of special buildings like hotels.

One of the main obstacles to reform resides in Japan's approach to fire codes. The majority of fire performance codes and standards have not been affected by the recent amendments to the Building Standards Law (BSL), which introduced performance-based standards related to structural aspects of a building. As a result, many aspects of the BSL relating to fire remain prescriptive, limiting wood construction and rendering wood-frame buildings less economical. Given new building designs, fire prevention and fire-fighting techniques, Canada believes the BSL as it relates to fire should also move to performance-based standards.

Canada encourages the Japanese government and the agencies responsible for fire-related issues to:

1) develop performance-based fire-protection standards aimed at fire prevention and controlling spread of fire, both from internal and external sources;
2) develop performance-based fire escape standards;
3) ensure that these standards are based on sound scientific evidence and adapted for the specific and unique circumstances of buildings in Japan;
4) examine alternative fire-prevention and fire-spread designs which would include sprinkler systems and other international practices, such as the use of fire walls; and
5) move to implement new performance-based fire protection standards within five years.

Revision of Japan Agricultural Standards (JAS)

Under the new MAFF system of scheduled and periodic review, the JAS143 standard for graded lumber is scheduled to have its five-year revision completed by April 2000. Canada is concerned that JAS143 will be adopted without sufficient consideration of Canadian data or positions, such as conclusions arising from lengthy scientific tests of Canadian and Japanese species regarding, for example, the wane and knot area ratio issues. The proposed revised JAS143 standard does not include spruce, pine or fir, which are major exports to Japan. Canada will press for acceptance of a performance-based approach in JAS standards.

Registered Certification Organizations (RCO) and Registered Grading Organizations (RGO)

Canada welcomes the decision by Japan to undertake a process to recognize foreign organizations for RCO and RGO status. In implementing this decision, Canada would encourage Japan to rely as much as possible on international standards rather than developing standards unique to the Japanese market. Recognizing that this represents an important new step in the internationalization for Japanese standards, Canada also encourages Japan to develop transparent and understandable systems, for example, in its requirement for equivalency for national standards.

Performance Requirements for Lumber for Traditional Housing

Canada is working to ensure that performance criteria being developed for traditional *zairai* housing in Japan should not be based solely on the use of *tsugi* lumber, but rather should recognize the characteristics of other species (e.g. hemlock).