



September 27, 2019

Dear Members of the Washington State Building Code Council:

On behalf of the NW Hearth, Patio & Barbecue Association, we continue to oppose the proposal before you -- WSEC R-27 – Gas Fireplace Efficiency (Proposed R402.4.2.1). This proposal is one that requires significantly more discussion, industry input, data gathering and review, and above all else, economic impact discussions that meet the requirements of the Washington State Administrative Procedures Act.

However, if you insist on moving forward with some type of regulation of gas fireplaces, we would suggest you recognize that the Province of British Columbia engaged the appropriate stakeholders in a detailed, regulatory process and through that process developed a proposal that was adopted – and manufacturers are currently manufacturing products that comply. This proposal clearly sets an efficiency rating for heater rated appliances that are more likely to be used long term to meet utilitarian heating needs but separates decorative appliances because their use and need for efficiency is significantly different.

Based on that process standard that you should consider as a proposal for the State Building Code Council is as follows:

**R402.4.2.1 Gas Fireplace Efficiency.** All natural-gas fireplaces rated to ANSI Z21.88 (heater-rated) shall be listed and labeled with a fireplace efficiency (FE) rating of 50% or greater. Natural-gas fire places rated to ANSI Z21.50 (decorative) must have an energy efficiency verification label which states the FE rating and indicates that it is a decorative product that is not intended to be used as a heating appliance. The energy efficiency verification label must be affixed to the rating plate.

NWHPBA is able to support the revisions made by the proponents to WSEC R-28 – Pilot Lights (Proposed R403.1.3) that includes additional language to clarify what pilot lights are allowed under the code.

If you have questions or need more information, please contact our Legislative Consultant, Carolyn Logue at either [Carolyn.logue@comcast.net](mailto:Carolyn.logue@comcast.net) or 360-789-3491.

Thank you,

Scott Ongley  
President, NWHPBA