

Ministerial Interpretation

The Construction Codes Act

CARBON MONOXIDE (CO) DETECTORS INSTALLED IN LIEU OF CO ALARMS

NBC 2020 Subsection 6.9.3. and Article 9.32.3.9.

Issue Number: NBC 2020 - 004
Date Effective: September 21, 2026
Expires: The day the National Building Code of Canada (NBC) 2030 comes into force in Saskatchewan, or earlier if amended to the NBC 2025 by regulation in Saskatchewan.
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Purpose

To provide options for *owners* of multi-unit residential and other *buildings* that are equipped with fire alarm systems to use interconnected CO detectors in lieu of CO alarms to meet the obligations of Henry's Law, coming into force November 1, 2026.

Discussion

On May 5, 2026, the Minister of Government Relations introduced Henry's Law, an amendment to the NBC. This amendment requires all residential *suites* in Saskatchewan, regardless of their location in the *building*, to have a CO alarm installed. The enhanced regulations are named in honour of Henry Losco, who passed away from carbon monoxide poisoning in Regina in December 2025.

Henry's Law will require CO alarms in all multi-unit residential *buildings* consisting of apartments, condominiums, houses with secondary *suites* and all other *buildings* with multiple residential *suites* by November 1, 2026, regardless of when the *building* was initially built or last renovated.

The Canadian Board for Harmonized Construction Codes has circulated a proposed code change that will amend the NBC 2025, allowing for the use of CO detectors in lieu of CO alarms.

Detectors that conform to CAN/ULC 588 "Standard for Gas and Vapour Detectors and Sensors, Including Accessories" provide for the connection to a source of power and signalling circuits and optional remote-control circuits. Additional functionality, such as a heat detector, heat sensor, smoke detector, smoke sensor or audible signalling appliance/device, is permitted to be incorporated as part of the toxic combustible gas and vapour detector assembly and is evaluated to the applicable standard(s). These detectors can be used in a variety of applications and will provide options to *designers* of *buildings* with a fire alarm system to use CO detectors in lieu of CO alarms.

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NBC 2020, Division B, Subsection 6.9.3. and Article 9.32.3.9. shall be applied and interpreted with the following substituted:

6.9.3. Carbon Monoxide Alarms and Detectors

6.9.3.1. Carbon Monoxide Alarms and Detectors

- 1) This Article applies to every *building* that contains a *residential occupancy*, a *care occupancy* with individual *suites*, a *care occupancy* containing sleeping rooms not within a *suite*, a *treatment occupancy*, a *detention occupancy* or a *child care centre*, and that also contains
 - a) a fuel-burning appliance, or
 - b) a *storage garage*.
- 2) Carbon monoxide (CO) alarms required by this Article shall
 - a) conform to CSA 6.19, 'Residential carbon monoxide alarming devices,'
 - b) be equipped with an integral alarm that satisfies the requirements of CSA 6.19, "Residential carbon monoxide alarming devices,"
 - c) have no disconnect switch between the overcurrent device and the CO alarm, where the CO alarm is powered by the electrical system serving the *suite* (see Note A-6.9.3.1.(2)(c)), and
 - d) be mechanically fixed at a height above the floor as recommended by the manufacturer.
- 3) Where a fuel-burning *appliance* is installed in a *suite* of *residential occupancy*, a *suite* of *care occupancy*, a *treatment occupancy*, *detention occupancy*, or a *child care centre*, a CO alarm shall be installed
 - (a) inside each bedroom, or
 - (b) outside each bedroom, within 5 m of each bedroom door, measured following corridors and doorways.
- 4) Where a fuel-burning *appliance* is installed in a *service room* that is not in a *suite* of *residential occupancy*, a *suite* of *care occupancy*, a *treatment occupancy*, a *detention occupancy*, or a *child care centre*, a CO alarm shall be installed
 - (a) either inside each bedroom, or if outside, within 5 m of each bedroom door, measured following corridors and doorways, in every *suite* of *residential occupancy* or *suite* of *care occupancy* or a *child care centre* that shares a wall or floor/ceiling assembly with the *service room*, and
 - (b) in the *service room*.
- (5) For each *suite* of *residential occupancy*, *suite* of *care occupancy*, *treatment occupancy*, *detention occupancy*, or a *child care centre* that shares a wall or floor/ceiling assembly with a storage garage or that is adjacent to an *attic* or crawl space to which the *storage garage* is also adjacent, a CO alarm shall be installed
 - (a) inside each bedroom, or
 - (b) outside each bedroom, within 5 m of each bedroom door, measured following corridors and doorways.

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6) In addition to Sentence (1), in a multi-unit residential *building* consisting of apartments, condominiums, houses with *secondary suites* and all other *buildings* with multiple residential *suites*, each *suite* or unit is required to have a CO alarm installed.

7) CO detectors are permitted to be installed in lieu of CO alarms, provided the CO detectors

- (a) conform to CAN/ULC 588:2024A, 'Gas and Vapour Detectors and Sensors, Including Accessories,'
- (b) are capable of independently sounding audible signals within the individual *suites*,
- (c) except as permitted in Sentence (8), are installed in conformance with CAN/ULC-S524, "Installation of Fire Alarm Systems," and
- (d) form part of the fire alarm system.

8) CO detectors installed in lieu of CO alarms as permitted in Sentence (7) are permitted to sound localized alarms within individual *suites*, and need not sound an alarm throughout the rest of the *building*.

9.32.3.9. Carbon Monoxide Alarms and Detectors (See Note A-9.32.3.9.)

1) This Article applies to every *building* that contains a *residential occupancy*, a *care occupancy* with individual *suites*, a *care occupancy* containing sleeping rooms not within a *suite*, an *alternative family care home*, or a *child care home*, and that also contains

- a) a fuel-burning appliance, or
- b) a storage garage.

2) Carbon monoxide (CO) alarms required by this Article shall

- a) conform to CSA 6.19, 'Residential Carbon Monoxide Alarming Devices,'
- b) be equipped with an integral alarm that satisfies the audibility requirements of CSA 6.19, 'Residential Carbon Monoxide Alarming Devices,'
- c) have no disconnect switch between the overcurrent device and the CO alarm, where the CO alarm is powered by the *dwelling unit's* electrical system, and
- d) be mechanically fixed at a height recommended by the manufacturer.

3) Where a room contains a solid-fuel-burning *appliance*, a CO alarm conforming to CSA 6.19, 'Residential Carbon Monoxide Alarming Devices' shall be mechanically fixed

- a) at the manufacturer's recommended height where these instructions specifically mention solid-fuel-burning *appliances*, or
- b) in the absence of specific instructions related to solid-fuel-burning *appliances*, on or near the ceiling.

4) Where a fuel-burning *appliance* is installed in a *suite* of *residential occupancy*, a *suite* of *care occupancy*, an *alternative family care home*, or a *child care home*, a CO alarm shall be installed

- a) inside each bedroom, or
- b) outside each bedroom, within 5 m of each bedroom door, measured following corridors and doorways.

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5) Where a fuel-burning *appliance* is installed in a *service room* that is not in a *suite* of *residential occupancy*, a *suite* of *care occupancy* or an *alternative family care home*, or a *child care home*, a CO alarm shall be installed

- a) either inside each bedroom, or if outside, within 5 m of each bedroom door, measured following corridors and doorways, in every *suite* of *residential occupancy* that shares a wall or floor/ceiling assembly with the *service room*, and
- b) in the *service room*.

6) For each *suite* of *residential occupancy*, a *suite* of *care occupancy*, an *alternative family care home* or a *child care home* that shares a wall or floor/ceiling assembly with a *storage garage* or that is adjacent to an *attic* or crawl space to which the *storage garage* is also adjacent, a CO alarm shall be installed

- a) inside each bedroom, or
- b) outside each bedroom, within 5 m of each bedroom door, measured following corridors and doorways.

7) Where CO alarms are installed in a house with a *secondary suite*, including their common spaces, the CO alarms shall be wired so that the activation of any one CO alarm causes all CO alarms within the house with a *secondary suite*, including their common spaces, to sound.

8) In addition to Sentence (1), in a multi-unit residential *building* consisting of apartments, condominiums, houses with *secondary suites* and all other *buildings* with multiple residential *suites*, each *suite* or unit is required to have a CO alarm installed.

9) CO detectors are permitted to be installed in lieu of CO alarms, provided the CO detectors

- a) conform to CAN/ULC 588:2024A, 'Gas and Vapour Detectors and Sensors, Including Accessories,'
- b) are capable of independently sounding audible signals within the individual *suites*,
- c) except as permitted in Sentence (10), are installed in conformance with CAN/ULC-S524, 'Installation of Fire Alarm Systems,' and
- d) form part of the fire alarm system.

10) CO detectors installed in lieu of CO alarms as permitted in Sentence (9) are permitted to sound localized alarms within individual *suites* and need not sound an alarm throughout the rest of the *building*."

Authority

Section 8 of *The Construction Codes Act*.

Jurisdiction

This interpretation will apply throughout Saskatchewan.

Original approved and signed by

The Honourable Eric Schmalz
Minister of Government Relations