



# Short-Term Rental Owner's Responsibilities for Fire Safety

Last updated November 20, 2023







# Fire Code Requirements for the Maintenance of Short-Term Rentals and Life Safety Systems

**Calgary Fire Department Inspections** has prepared this reference document listing common fire safety maintenance requirements as found in the National Fire Code – 2019 Alberta Edition. With some exceptions, these requirements apply to all Short-Term Rentals in the City of Calgary. For a complete list of requirements see the [National Fire Code – 2019 Alberta Edition](#) – also referred to as NFC(AE).

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## What is a Short-Term Rental?

Short-Term Rental is the business of providing temporary accommodation for compensation, in a dwelling unit or portion of a dwelling unit for boarders or roomers for periods of up to 30 consecutive days. There are Two Tiers associated with Short-Term Rentals. Tier 1 is defined as providing accommodations of one to four bedrooms for up to eight occupants. A Tier 2 Short-Term Rental is defined as offering 5 or more bedrooms for rent in a single unit with no overlapping bookings for ten or more occupants. However, there is one consideration for Tier 2 rentals if you are looking to entertain more than five bedrooms at double occupancy a Fire Alarm will be required as per the National Building Code Alberta Edition (NBC(AE)).

## Who is an Owner?

The *Safety Codes Act* under which NFC(AE) is applied, defines an “owner” to include a lessee, a person in charge, a person who has care and control and a person who holds out that the person has the powers and authority of ownership or who for the time being exercises powers and authority of ownership. Unless otherwise specified, the owner or the owner’s authorized agent shall be responsible for carrying out the provisions of this Code. NFC(AE) Div. C 2.2.1.1.(1)

# Fire Safety Maintenance Requirements

## General Requirements

There are general requirements that apply to all buildings, such as, maintenance of heating and cooling systems, door hardware and locking features, accumulation of combustible materials, electrical installations and means of egress. To reduce the hazards associated with the accumulation of combustible materials the owner is responsible for regularly checking lint traps and furnace filters, as well as, ensuring there is no buildup of combustible materials near fuel burning appliances. The owner is also responsible to ensure all doors and egress windows function properly and that all exit pathways are in good repair and free of obstructions such as snow and ice.

Weekly	NFC(AE)
Hoods, Ducts and Filters in Ventilation Systems – <b>INSPECT</b> for accumulation of combustible deposits and clean as required	2.6.1.3
Monthly	NFC(AE)
Exit Doors – <b>TEST</b> all doors forming a part of a means of egress to ensure they are operable	2.7.2.1.(1)
Annually	NFC(AE)
Chimney Spark Arrestors – <b>INSPECT, CLEAN</b> and repair burnt-out arrestors	2.6.2.3
Chimneys, Flues and Flue Pipes – <b>INSPECT</b>	2.6.1.4.(1)
Ongoing Requirements	NFC(AE)
Access Panels and Windows – <b>MAINTAIN</b> free of obstruction where provided to facilitate access for firefighting operations	2.5.1.2
Chimneys, Flues and Flue Pipes – <b>MAINTAIN</b> by cleaning to keep them free of dangerous accumulations of combustible deposits; replace or repair as per Sentence 2.6.1.4.(3); <b>MAINTAIN</b> clearances between chimneys, flue pipes, or appliances and combustible construction as per NBC(AE)	2.6.1.4.(2) 2.6.1.5.(1)
Closures in a fire separation (doors, shutters, dampers, etc.) – <b>INSPECT</b> and <b>MAINTAIN</b> so that defects are corrected and closures are operable at all times; repair where damaged to <b>MAINTAIN</b> the integrity of their fire-protection rating	2.2.2.4 2.2.2.2
Combustible Materials – <b>CHECK</b> to ensure materials are <b>not accumulating</b> in any part of an elevator shaft, ventilation shaft, means of egress, service room or service space, or being stored in crawl spaces, ceiling spaces or roofs	2.4.1.1
Door Release Hardware, Latches and Locks – <b>MAINTAIN</b> in good working condition at all times	2.7.2.1.(6)
Electrical Installations – Use and <b>MAINTAIN</b> so as to not constitute an undue fire hazard	2.4.7.1
<i>Means of egress</i> shall be maintained in good repair and free of obstructions.	2.7.1.6.(1)
Exterior Passageways and Exit Stairs – <b>MAINTAIN</b> free of snow and ice accumulations; <b>MAINTAIN</b> equipment used to melt snow or ice	2.7.1.7
Fire Separations – Repair where damaged to <b>MAINTAIN</b> the integrity of the fire separation	2.2.1.2
Heating, Ventilating and Air-Conditioning Systems, including appliances, chimneys and flue pipes – Operate and <b>MAINTAIN</b> so as not to create a hazardous condition	2.6.1.6.(1)
Laundry Equipment – <b>CHECK</b> and empty lint traps to prevent lint from accumulating	2.4.1.4
Means of Egress – <b>MAINTAIN</b> in good repair and free of obstructions	2.7.1.6

## Maximum Number of Occupants

The *Occupant load* is defined as the number of persons for which a *building* or part thereof is designed. The maximum permissible *occupant load* for any room shall be calculated based on the number of occupants determined in accordance with Table 3.1.17.1. of Division B of the NBC(AE). In the case of Short-Term Rentals, the number of occupants is based on the number of sleeping rooms at double occupancy containing egress windows or protected by sprinklers that are tested annually. As well, the Bylaw specifically requires that all Short-Term rentals post the occupant load card near the main entrance adjacent to the floor plan, Short-Term Rental Host Emergency Contact information and Guest Record.

# Fire Safety Maintenance Requirements

For example, if you have a rental property with three bedrooms, all with proper sized egress windows, the occupant load would be posted as six (6) occupants. Occupant load cards are required by the Bylaw and posted as per the NFC(AE). Although the posted occupant load card is not required by the NFC(AE) it is required by the Bylaw and therefore maintained in accordance with 2.1.4 of the NFC(AE). The Occupant Load Card must be posted near the exit along with the emergency plan and the floor plan.

Occupant Load	NFC(AE)
The maximum permissible <i>occupant load</i> for any room shall be calculated on the basis of the lesser of a) the number of occupants determined in accordance with Table 3.1.17.1. of Division B of the NBC(AE), b) the <i>occupant load</i> for which <i>means of egress</i> are provided, or c) the <i>occupant load</i> as calculated and posted in accordance with the NBC(AE).	2.7.1.3.(1)
Occupant Load is determined in a dwelling unit based on 2 persons per sleeping room.	<b>NBC(AE)</b> 3.1.17.1.
Signs required by the NBC(AE) to indicate the <i>occupant load</i> for a <i>floor area</i> shall be posted in conspicuous locations near the principal entrances to the <i>floor area</i> . (See Note A-2.7.1.4.(2).)	2.7.1.4.(2)
Where a sign, notice, placard or information is required to be posted, it shall be a) clearly legible, and b) except as provided in Sentence (2), permanently mounted in a conspicuous or prominent location in proximity to the situation to which it refers.	2.1.4.1.(1)
Every sign, notice, placard or information that is required to be posted shall be maintained in conformance with Article 2.1.4.1.	2.1.4.2.(1)

## Egress Window Requirements

Except where the suite is sprinklered, each bedroom or combination bedroom shall have at least one outside window or exterior door openable from the inside without the use of keys, tools or special knowledge and without the removal of sashes or hardware. For more details on window egress requirements please download the [“Advisory Bulletin Egress Window Guidelines”](#) on the City of Calgary website.

Egress Window Guidelines (National Building Code(AE))	NBC(AE)
2. The window referred to in Sentence (1)	9.9.10.1.(2).
a. shall provide an unobstructed opening of not less than 0.35 m <sup>2</sup> in area with no dimension less than 380 mm, and	9.9.10.1.(2)(a)
b. maintain the required opening during an emergency without the need for additional support (see Appendix A)	9.9.10.1.(2)(b)
3. Where a window required in Sentence (1) opens into a window well, a clearance of not less than 760mm shall be provided in front of the window (see Appendix A).	9.9.10.1.(3).
4. Where the sash of a window referred to in Sentence (3) swings towards the window well, the operation of the sash shall not reduce the clearance in a manner that would restrict escape in an emergency.	9.9.10.1.(4).
5. Where a protective enclosure is installed over the window well referred to in Sentence (3), the enclosure shall be openable from the inside without the use of keys, tools or special knowledge of the opening mechanism.	9.9.10.1.(5).
6. If the window referred to in Sentence (1) is provided with security bars, the security bars shall be openable from the inside without the use of keys, tools or special knowledge.	9.9.10.1.(6).

# Fire Safety Maintenance Requirements

## Smoke Alarms / Carbon Monoxide Alarms

There must be functioning smoke alarms installed in each dwelling unit in accordance with the NBC(AE). Smoke Alarms shall be installed on each storey including basements, in each sleeping room, and in the hallway between sleeping rooms on or near the ceiling. Where one or more smoke alarms are required they shall be interconnected so when the activation of one alarm will cause all the alarms in the dwelling unit to sound. The smoke alarms must be tested monthly and cleaned between each new tenant. As well, tenants must be provided with information related to ongoing testing and maintenance requirements if the stay is greater than one month (30 days). Carbon monoxide detectors are required to be installed and mechanically fastened in each bedroom or outside each bedroom within 5 m of the bedroom door.

Ongoing Requirements	NFC(AE) / NBC(AE)
<i>Smoke alarms</i> within <i>dwelling units</i> shall be installed between each sleeping area and the remainder of the <i>dwelling unit</i> , and where the sleeping areas are served by hallways, the <i>smoke alarms</i> shall be installed in the hallways.	2.1.3.3.(2)
<i>Smoke alarms</i> shall be installed in conformance with CAN/ULC-S553, "Installation of Smoke Alarms." (See Note A-2.1.3.3.(3).)	2.1.3.3.(3)
<i>Smoke alarms</i> are permitted to be battery-operated in <i>dwelling units</i> constructed before July 5, 1977. (See Note A-2.1.3.3.(4).)	2.1.3.3.(4)
Fire protection installations shall be maintained in operating condition. (See Note A-6.1.1.2.(1).)	6.1.1.2.(1)
<i>Smoke alarms</i> shall be inspected, tested and maintained in conformance with CAN/ULC-S552, "Inspection, Testing and Maintenance of Smoke Alarms."	6.7.1.1.(1)
Carbon Monoxide detectors required where fuel burning appliances are installed	NBC(AE) 9.32.3.9
Carbon monoxide alarms shall be inspected, tested and maintained in conformance with the manufacturer's instructions.	6.7.1.1.(3)
The <i>owner</i> of a leased <i>dwelling unit</i> shall a) ensure <i>smoke alarms</i> within the <i>dwelling unit</i> are tested and cleaned prior to <i>occupancy</i> , and b) provide tenants information concerning ongoing <i>smoke alarm</i> testing and maintenance.	6.7.1.1.(4)

## Portable Fire Extinguishers

As Short-Term Rentals are providing accommodation for boarders or roomers NFC(AE) Division B, Subsection 2.11.2.1(1) requires that at least one portable extinguisher having a 2-A rating shall be installed on each *storey* of a *building* described in Article 2.11.1.1, "Standard for Portable Fire Extinguishers." Section 6.2 further requires that extinguishers be inspected, tested and maintained in conformance with the same standard. Monthly inspections may be completed by the owner or owner representative. However, all maintenance must be completed by qualified personnel.

## Installation and Selection of Extinguishers

Refer to the [NFPA Fire Extinguisher Location and Placement](#) fact sheet for location and installation guidelines. Where questions arise, owners should refer to a qualified person employed by a certified company or Calgary Fire Inspections via 311.

## Inspection, Testing and Maintenance Requirements

Frequency	Requirements
Monthly (see below)	<b>INSPECT</b> extinguisher and sign monthly tag area as per NFPA 10 7.2.2
Annually	<b>INSPECT, TEST</b> and <b>MAINTAIN</b> as per NFPA 10 by qualified personnel acceptable to the AHJ
Every 5 Years	Hydrostatically <b>TEST</b> at 5 years of age as required by NFPA 10 Table 8.3.1
Every 6 Years	<b>REPLACE</b> the extinguishing agent in stored-pressure fire extinguishers as per NFPA 10 7.3.6
Every 12 Years	Hydrostatically <b>TEST</b> at 12 years of age as required by NFPA 10 Table 8.3.1

# Fire Safety Maintenance Requirements

## Monthly Inspection

Prior to signing the monthly tag area, inspection shall include a check of at least the following indicators:

1. Location in designated place
2. No obstruction to access or visibility
3. Pressure gauge reading or indicator in the operable (“normal”) range or position
4. Fullness determined by weighing or hefting
5. Condition of tires, wheels, carriage, hose and nozzle (for wheeled extinguishers)
6. Indicator for non-rechargeable extinguishers using push-to-test pressure indicators

Refer to [Fire Code Interpretation STANDATA 19-FCI-009R1](#) “Portable Fire Extinguishers” for clarification on the intent of NFC(AE) and NFPA 10 for inspection, maintenance, recharging, placement, refurbishing and the applicable listing and labelling (service tags).

## Posting of Fire Emergency Procedures

All Short-Term Rentals require a floor plan, copy of emergency procedures, and the occupant load card to be posted near the main entrance of the occupancy and on the inside of each sleeping room to be rented. In addition to the Short-Term Rental Host Emergency Contact, please consider also providing information such as the closest hospital, location of utility shut offs, flashlights, and first aid kits to assist in an emergency.

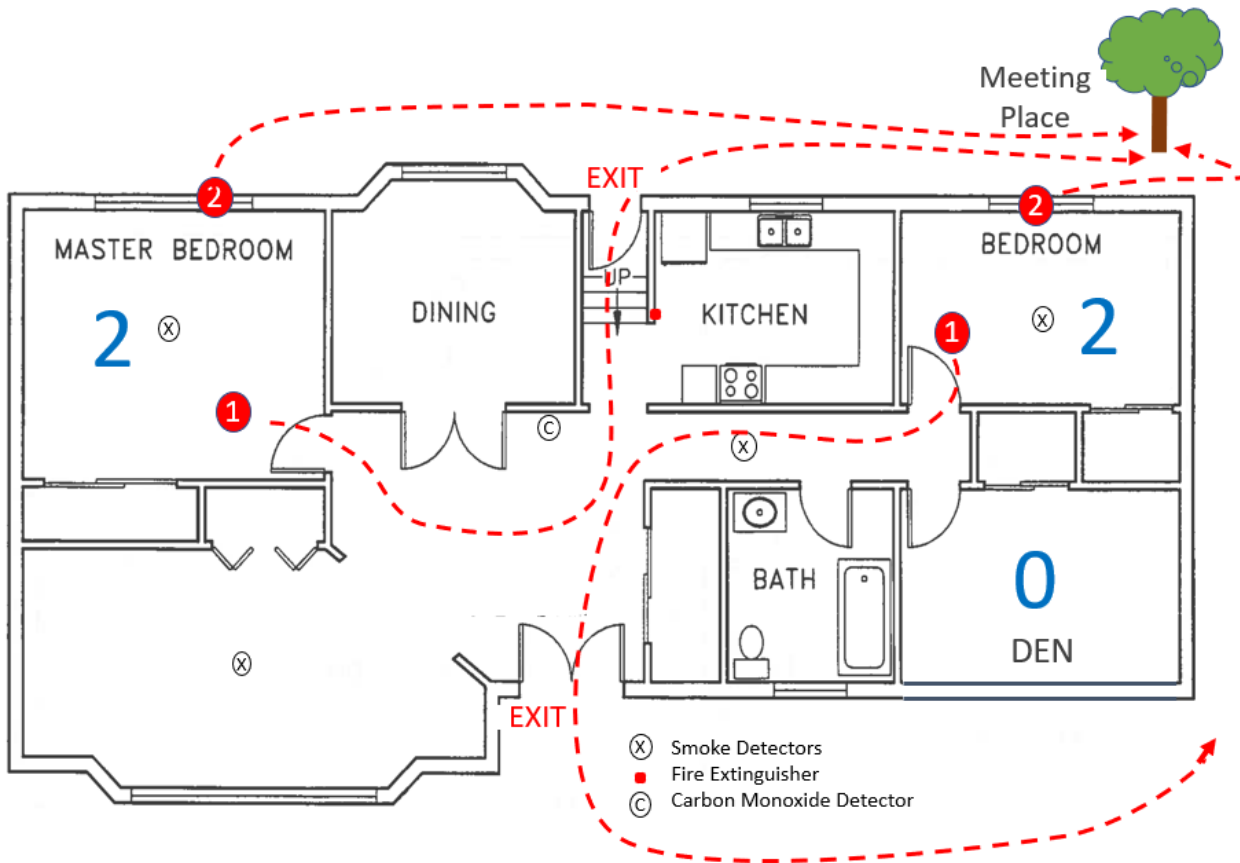


Figure 1 Sample Floor basic information required on the floor plan

Note: The blue numbers represent an example of the occupant load considerations. See the occupant load section for further details.



# Fire Safety Maintenance Requirements

		<b>CALGARY FIRE DEPARTMENT</b>	
<b>10000 COUNTRY HILLS GV NW CALGARY</b>			
SR Number: FH23-014910		BL Number: 23-014910	
<p>On 1/1/1800 a(n) Short-Term Rental Business Licence Inspection was completed by [Fire Inspector Name here]          This location has received Calgary Fire Department's approval for use as a Short-Term Rental.          The City Business Licensing Department will be notified of your business' approval. If you have further questions related to your business license or non-emergency fire safety concerns you can contact 3-1-1 and they will be directed to the appropriate department.          The Calgary Fire Department thanks you for complying with the safety regulations regarding your Short Term Rental.</p>			
<b>Date of Issue:</b> Nov 27, 2023  <b>Signed by:</b> <b>Fire Marshal:</b>  	<h2 style="margin: 0;">MAXIMUM OCCUPANT LOAD</h2> <h1 style="margin: 0;">4</h1> <p style="margin: 0;"><b>RESTRICTIONS:</b></p> Occupant load restricted to 4 based on double occupancy of each bedroom with egress windows		

Figure 2 Sample Occupant Load Card

Ongoing Requirements	NFC(AE)
At least one copy of the fire emergency procedures shall be prominently posted on each <i>floor area</i> .	2.8.2.7.(1)
In every hotel and motel bedroom, the fire safety rules for occupants shall be posted showing the locations of <i>exits</i> and the paths of travel to <i>exits</i> .	2.8.2.7.(2)
Where a fire alarm system has been installed with no provisions to transmit a signal to the fire department, a sign shall be posted at each manually actuated signaling box requesting that the fire department be notified and including the telephone number of that department.	2.8.2.7.(3)

## Additional requirements

If your building has a Fire Alarm, Sprinkler System, or located in a High Building please download the [“Building Owners Responsibilities for Fire Safety”](#) Guide for additional requirements.

The Inspector will review all inspection records related to testing and maintenance of life safety systems. This will ensure the building life safety systems are functioning properly before providing fire approval for a Short-Term Rental located within a high building, containing a fire alarm, or a sprinkler system. Please be prepared for delays in approval if violations are identified with the buildings life safety systems.

## Revision History

Major revisions to this document are detailed below. With the exception of the most recent publication all other revisions are considered to be withdrawn. Calgary Fire Department Inspections reserves the right to modify or adjust this document without notice. Refer to [Building and business fire codes \(calgary.ca\)](#) for the most recent edition of this document.

# Fire Safety Maintenance Requirements

Publication Date	Details
November 20, 2023	Prepared for the initial Short-Term Rental roll out.