



Canadian Standards Association
Mississauga, Ontario
To the Part I Committee

Subject No. 3095-26

Chair: R. Leduc

Date: March 11, 2003

Title: Cord-connected Hydromassage Bathtubs, Rules 26-710(h) and 26-720(f)

Submitted by: A.Z. Tsisserev of the City of Vancouver (on behalf of the Subcommittee on C22.2 No. 218.2) on October 19, 2002.

Proposal:

- 1) To amend Rule 26-710 by adding a new Paragraph “h” to read as follows: **“(h) Where a cord-connected hydromassage bathtub conforming to Rule 68-300 is intended to be installed, one receptacle located at not less than 300 mm from the floor shall be provided for the use with the hydromassage bathtub, and shall be inaccessible to the hydromassage bathtub occupant.”**;
- 2) To renumber existing Paragraphs (h) to (n) as Paragraphs **(i) to (o)**;
- 3) To add appendix B Note on Rule 26-710 (h) to read as follows: **Appendix B Note on Rule 26-710 (h) “It is intended by this Rule to specify the location of the dedicated receptacle for a cord-connected hydromassage bathtub. The intent of this Rule is to render this receptacle inaccessible to a person in the hydromassage bathtub by installing this receptacle behind an access panel, a skirt, an apron or other suitable barrier described in the manufacturer’s instruction.”**
- 4) To add new paragraph (f) to Rule 26-720 to read as follows:
.
(f) “Each receptacle installed for a cord-connected hydromassage bathtub in accordance with Rule 26-710(h) shall be supplied by a branch circuit that does not supply any other outlets.”

Reasons for these requests and supporting information:

Presently Scope of C22.2 No.218.2 covers only permanently connected hydromassage bathtubs that are intended to be installed in conformance with the requirements of the CEC, Part I. The similar U.S. standard UL 1795 covers permanently and cord-connected hydromassage bathtubs.

The S/C on CSA C22.2 No. 218.2 is presently working to harmonize the UL and the CSA standards and to amend the CSA standard by extending it’s Scope to the cord-connected hydromassage bathtubs.

When the amendment to the CSA standard is adopted and a cord-connected hydromassage bathtub is certified for use in Canada, additional rules would be required in the CE Code, to reflect use of this new product under the installation rules of the Part I. (see C7 of Appendix C.)

As such, a new requirement and the explanatory Appendix B Note has been proposed for Rule 26-710 in order to safely install the receptacle dedicated to a cord-connected hydromassage bathtub. A reference to Rule 68-300 will establish a link between this dedicated receptacle and installation requirements for hydromassage bathtubs.

Accordingly, a new requirement proposed for Rule 26-720 acknowledges the fact that a separate circuit is necessary for this dedicated receptacle in order to safely accommodate a load represented by the hydromassage bathtub equipment.

Concurrently, a new rule is proposed for Subsection “Hydromassage Bathtubs” in Section 68 – to recognise the fact that permanently and cord-connected hydromassage bathtubs are permitted for installation. A new requirement is proposed to reflect a necessity for a dedicated branch circuit for the hydromassage bathtubs (regardless whether this bathtub is permanently or cord-connected).

And finally a new rule is proposed to mandate a warning label for this receptacle.

Chair’s Comments:

I ask Subcommittee members to consider some current practices that may be impacted by this proposal. At least in Alberta, I am aware of a practice of supplying the hydromassage bathtub from the GFCI receptacle in the bathroom. Prescribing a dedicated circuit would impact this wiring practice.

The Subcommittee should also consider the statement in the Scope of the Code suggesting that it is not intended to be a design specification. The size of the motor for the hydromassage bathtub should dictate whether a dedicated circuit is required or not (e.g., a hydromassage bathtub with a 1/3 HP motor could conceivably be supplied from a 120V circuit supplying 4 or 5 other receptacles based on Rule 12-3000(1) [1A per receptacle]. Alternatively, a hydromassage bathtub with a 120V/240V 1HP motor would need to be supplied from 120V 20A circuit or a 240V 8A circuit.)

Perhaps an appropriate Appendix B note guiding designers/installers to consider the load of a hydromassage bathtub in determining the appropriate wiring practice for the given installation would better meet the needs of users.

Any remarks to the Chair’s comments should be included in the member’s comments agreeing or disagreeing with the proposal.

Subcommittee Deliberations (1st Round)

Seven (7) members responded of a possible thirteen (13), 6 agreeing with the submission and 1 disagreeing.

The member that disagreed did so based on the chairs comments and the proposed requirement for a dedicated circuit.

Of the seven members that agreed, two provided comments.

One response (also the submitter on behalf of C22.2 No. 218.2) fully supported the proposal but also recognized the potential impact of the proposal as suggested in the “chair’s comments”. The member suggested that the EQA expert participating on C22.2 No. 218.2 could be invited to comment.

The other comment (a joint response from 2 persons at EQA) again supported the proposal but agreed with the concept of supplying the hydromassage bathtub from the bathroom receptacle and suggested deleting part 4) of the proposal.

Chair's Comments (1st round)

In deleting item 4) of the proposal, the disagreeing member agrees that his concerns would be addressed. However, deleting item 4) removes a significant component of the proposal and I am reluctant to go to Part I with a consensus recommendation. On the other hand, the proposed deletion of item 4) was suggested by those closest to the issue and does address a major concern for Alberta. In addition, the submitter encouraged comments from EQA and supports their suggested change.

Since it is timely we get this subject dealt with for the next meeting of Part I and all S/C members that may have concerns with the proposed change are also members of the Part I TC, I will declare consensus for the following:

Subcommittee Recommendation

- 1) To amend Rule 26-710 by adding a new Paragraph "h" to read as follows:
 - (h) Where a cord-connected hydromassage bathtub conforming to Rule 68-300 is intended to be installed, one receptacle located at not less than 300 mm from the floor shall be provided for the use with the hydromassage bathtub, and shall be inaccessible to the hydromassage bathtub occupant.
- 2) To renumber existing Paragraphs (h) to (n) as Paragraphs (i) to (o);
- 3) To add appendix B Note on Rule 26-710 (h) to read as follows:

26-710 (h) *It is intended by this Rule to specify the location of the dedicated receptacle for a cord-connected hydromassage bathtub. The intent of this Rule is to render this receptacle inaccessible to a person in the hydromassage bathtub by installing this receptacle behind an access panel, a skirt, an apron or other suitable barrier described in the manufacturer's instruction.*