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**Subject:** Public Comment Submittal IFC Part 9  
**Date:** Tuesday, May 5, 2026 4:43:06 PM  
**Attachments:** [image001.png](#)  
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Dear California Building Standards Commission,

Please accept this email as a public comment submitted to the office of the State Fire Marshal (SFM).

This comment is related to the 2025 California Fire Code, Part 9.

The agency submittal number is SFM 03/25.

There is no ITEM number, because the SFM does not currently propose amendments to Chapter 6.

However, we hope that this matter will be considered.

We understand that the current version of the California Fire Code has not included some errata corrections that have been published by ICC since the 2024 first printing of the IFC. The specific issue of concern relates to ammonia and carbon dioxide refrigeration systems and are addressed in Section 608 (refrigeration), which was changed during the 2024 IFC development process but was not correctly published (accidentally omitted) by ICC. ICC has since updated their digital code to include the errata. In addition, there were no proposals to change these sections for the 2027 version of the IFC, for which the development cycle has recently been completed. We also understand that the errata represents a substantial change for Title 24 and therefore must be considered for regulatory impact through the public review process before inclusion as Title 24 errata, or for an update. This is why we are submitting this comment.

The reason for the 2024 changes to the IFC are straightforward. For ammonia refrigeration systems, the IFC references IIAR 2 for system design, IIAR 6 for Inspection, Testing and Maintenance, IIAR 7 for Operating Procedures, and IIAR 8 for Decommissioning. Provisions in the IFC related to ammonia refrigeration systems were redundant to requirements in IIAR 2-2021. These changes were made to remove the redundancy and offer designers, end users, code officials, and regulators a single source for ammonia refrigeration system requirements. The IFC also requires compliance with IIAR CO2 for carbon dioxide refrigeration systems, which is particularly important for installation, inspection, testing, and maintenance of large-scale CO2 systems. The changes to the IFC are shown here:







We appreciate the opportunity to submit this comment for your consideration and are happy to provide additional information you might want.

Sincerely on Behalf of IIAR,

**Eric M. Smith, P.E.**

Vice President of Technology, Advocacy, Research, Publications

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