

Topic: Technical Committee meeting to discuss ICC-Group A code proposals	Support Materials
Call to Order • Roll Call • Antitrust Reminder • Welcome First Time Attendees • Agenda Review and Approval	00 – Antitrust Quick Reference
ICC-Group A Code Proposals • Multiple codes (IWUIC, IBC, IRC) ○ ICC39 - Implications of “be labeled” and “bear a label” ○ ICC50 - Consistency of “roof deck” definition ○ ICC51 – Alignment of “roof assembly” definition ○ ICC52 - Remove the term “roof covering system” from definitions ○ ICC53 – Align codes regarding Class A fire classification exceptions • International Wildland- Urban Interface Code (IWUIC) ○ ICC54 - Clarify roof flashing language ○ ICC55 - Expand roof valley provisions to address both open and closed valley construction ○ ICC56 - Additional options for protection from flame and ember intrusion under raised roof coverings ○ ICC57 - Ensure that the exceptions in the three WUI Construction Classes provide equivalent performance to Class A classification • International Building Code (IBC) ○ ICC58 - Fire classification of landscaped roofs ○ ICC59 - Correct “roofing assembly” in <i>Section 2603.6.</i> ○ ICC60 - Align definition of “emittance” to align with IECC Items being developed by other parties • Stantec (Milad Shabanian) ○ <i>IWUIC Proposal Concepts</i> • Kevin Scott ○ <i>Rewrite of IWUIC ventilation section</i> Additional ideas from ARMA member representatives • Discussion on proposal concepts from ARMA member companies ○ <i>Discuss additional concepts for Group A</i>	01 – ICC Group A Concepts_Expanded 02 –Group A Prioritization Worksheet
Assignments & Action Item Review • Next Meeting – Tuesday, September 15, 2026 (8:00 am – 10:00 am)	
Adjournment	



To: ARMA Members and Staff

From: Reed Hitchcock, Executive Vice President

Re: Antitrust Compliance - Quick Reference

The Asphalt Roofing Manufacturers Association (“ARMA” or “Association”) has in effect an Antitrust Compliance Policy (“Policy”). The Policy is intended for the guidance of ARMA member company representatives, officers, directors and staff, when engaged in any activity conducted in the name of, or on behalf of, ARMA. All such persons are expected to be familiar with the Policy and to follow it both in letter and in spirit.

The following cautionary statements are taken from the full Policy and are intended to be used as a quick reference tool. This document is not a substitute for the full Policy, which is available from the Association’s office and with which all are expected to be conversant. At all Association meetings and events, including informal gatherings before, during or following such meetings and events, ARMA members, their representatives and guests will not discuss any of the following competitively sensitive topics:

1. Current or future prices, price levels, costs or profit margins.
2. What is a fair or rational profit level.
3. Actions which could lead to standardizing or stabilizing prices.
4. Pricing or bidding methodologies or procedures.
5. Pricing practices or strategies, including methods, timing or implementation of price changes.
6. Whether or how prices, warranties or other terms of sale are advertised.
7. Cash or any other discounts, rebates, service charges or other terms and conditions of sale.
8. Credit terms.
9. Product warranty terms.
10. Actual, planned or projected production, production capacity or capacity utilization.
11. Projected demand.
12. Confidential company plans for new products.
13. Dividing or allocating geographic or product markets or customers.
14. Whether or on what terms to do business with a supplier, competitor or customer.
15. Whether or on what terms to solicit other companies’ employees for employment.
16. The business practices of individual firms.
17. The validity of any patent or the terms of any patent license.
18. Ongoing litigation, unless being reported upon by ARMA’s General Counsel or discussed appropriately at ARMA’s Counsel Forum.

We hope the above rules will be helpful as you participate in ARMA meetings and other activities. If you have any questions about antitrust compliance, do not hesitate to contact ARMA’s General Counsel:

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ICC GROUP A PROPOSAL CONCEPTS

ICC39 (IBC, IRC, ISPSC)

Ensure “be labeled” and “bear a label” both require third-party inspection

Overview

The phrases “bear a label” and “be labeled” are both used in the codes and are generally interpreted as equivalent. However, the definition of “labeled” explicitly requires third-party inspection while the definition of “label” only requires testing of a representative sample. The intention is to modify the definition of “label,” so it is clearly the “identification applied” by a manufacturer to a product that is required to either “bear a label” or “be labeled” and that “labeled” is the condition of a product that is required to either “bear a label” or “be labeled.” Ultimately, whether the code language requires a product to “bear a label” or “be labeled,” the intended outcome is that third-party inspection is triggered.

This is important because many asphalt roofing products cannot be “labeled” (i.e., have information permanently associated with the product). Instead, asphalt roofing packaging is often required to “bear a label.” The following are examples from the 2024 International Residential Code (IRC):

- **R905.2.4.1 Wind resistance of asphalt shingles.** Asphalt shingle packaging shall bear a *label* to indicate compliance with ASTM D7158 and the required classification in Table R905.2.4.1
- **R905.16.5. Material standards.** BIPV shingles shall be listed and labeled in accordance with UL 7103.

Staff Commentary

This proposal is expected to generate significant interest from multiple stakeholders. The key changes associated with this proposal are in the IBC, IRC, and ISPSC. The changes shown below in the draft proposal, which make all definitions of “labeled” consistent throughout all I-codes, are nice to have but not essential. Sections without changes are shown to provide context.

Draft Proposal for Group A

Upon further study, it was determined that no action is required during Group A. If this concept is to be carried forward, all action will be during Group B.

Draft Proposal for Group B

2024 International Building Code (IBC)

Section 202 Definitions

[A]LABEL. An identification applied by the manufacturer on a product that is required to be labeled or bear a label by the manufacturer that contains the name of the manufacturer, the function and performance characteristics of the product or material and the name and identification of an approved agency, ~~and that indicates that the representative sample of the product or material has been tested and evaluated by an approved agency~~ (see Section 1703.5, “Manufacturer’s designation” and “Mark”).

ICC GROUP A PROPOSAL CONCEPTS

ICC39 (IBC, IRC, ISPSC)

Ensure “be labeled” and “bear a label” both require third-party inspection

[A]LABELED. Equipment, materials or products to which has been affixed a label, seal, symbol or other identifying mark of a nationally recognized testing laboratory, approved agency or other organization concerned with product evaluation that maintains periodic inspection of the production of the ~~above~~-labeled items and whose labeling indicates either that the equipment, material or product meets identified standards or has been tested and found suitable for a specified purpose.

1703.5 Labeling. Products, materials or assemblies required to be labeled ~~or bear a label~~ shall be labeled in accordance with the procedures set forth in Sections 1703.5.1 through 1703.5.4.

1703.5.1 Testing. An approved agency shall test a representative sample of the product, material or assembly being labeled to the relevant standard or standards. The approved agency shall maintain a record of the tests performed. The record shall provide sufficient detail to verify compliance with the test standard.

1703.5.2 Inspection and identification. The approved agency shall periodically perform an inspection, which shall be in-plant if necessary, of the product or material that is to be labeled. The inspection shall verify that the labeled product, material or assembly is representative of the product, material or assembly tested.

1703.5.3 Label information. The label shall contain the manufacturer’s identification, model number, serial number or definitive information describing the performance characteristics of the product, material or assembly and the approved agency’s identification.

1703.5.4 Method of labeling. Information required to be permanently identified on the product, material or assembly shall be acid etched, sand blasted, ceramic fired, laser etched, embossed or of a type that, once applied, cannot be removed without being destroyed.

2024 International Residential Code (IRC)

Section R202 Definitions

[RB]LABEL. An identification applied ~~by the manufacturer~~ on a product ~~by the manufacturer that is required to be labeled or bear a label~~ that contains the name of the manufacturer, the function and performance characteristics of the product or material, and the name and identification of an approved agency ~~and that indicates that the representative sample of the product or material has been tested and evaluated by an approved agency.~~ (See also “Manufacturer’s designation” and “Mark.”)

ICC GROUP A PROPOSAL CONCEPTS

ICC39 (IBC, IRC, ISPSC)

Ensure “be labeled” and “bear a label” both require third-party inspection

[RB]LABELED. Equipment, materials or products to which have been affixed a label, seal, symbol or other identifying mark of a nationally recognized testing laboratory, approved agency or other organization concerned with product evaluation that maintains periodic inspection of the production of ~~thesuch~~ labeled items and whose labeling indicates either that the equipment, material or product meets identified standards or has been tested and found suitable for a specified purpose. For the definition applicable in Chapter 11, see Section N1101.6. For the definition applicable in Chapter 24, see Section G2403.

International Swimming Pool and Spa Code (ISPSC)

Section 202 Definitions

[A]LABEL. An identification applied ~~by the manufacturer~~ on a product ~~by the manufacturer that is required to be labeled or bear a label~~ that contains the name of the manufacturer, the function and performance characteristics of the product or material, and the name and identification of an *approved* agency ~~and that indicates that the representative sample of the product or material has been tested and evaluated by an approved agency.~~

[A]LABELED. Equipment, materials or products to which has been affixed a label, seal, symbol or other identifying mark of a nationally recognized testing laboratory, *approved* agency or other organization concerned with product evaluation that maintains periodic inspection of the production of the ~~above~~-labeled items and whose *labeling* indicates either that the equipment, material or product meets identified standards or has been tested and found suitable for a specified purpose.

2024 International Fire Code (IFC)

Section 202 General Definitions

[A]LABELED. Equipment, materials or products to which have been affixed a label, seal, symbol or other identifying mark of a nationally recognized testing laboratory, *approved* agency or other organization concerned with product evaluation that maintains periodic inspection of the production of ~~thesuch~~ labeled items and whose labeling indicates either that the equipment, material or product meets identified standards or has been tested and found suitable for a specified purpose.

2024 International Fuel Gas Code (IFGC)

Section 202 (IFGC) General Definitions

[A]LABELED. Equipment, materials or products to which have been affixed a label, seal, symbol or other identifying mark of a nationally recognized testing laboratory, approved agency or other organization concerned with product evaluation that maintains periodic inspection of the production of the ~~above~~-labeled items and whose labeling indicates either that the equipment, material or product meets identified standards or has been tested and found suitable for a specified purpose.

ICC GROUP A PROPOSAL CONCEPTS

ICC39 (IBC, IRC, ISPS)

Ensure “be labeled” and “bear a label” both require third-party inspection

2024 International Property Maintenance Code (IPMC)

Section 202 General Definitions

[A]LABELED. Equipment, materials or products to which have been affixed a label, seal, symbol or other identifying mark of a nationally recognized testing laboratory, approved agency or other organization concerned with product evaluation that maintains periodic inspection of the production of the ~~above~~-labeled items and whose labeling indicates either that the equipment, material or product meets identified standards or has been tested and found suitable for a specified purpose.

2024 International Green Construction Code (IGCC)

301.2 (3.2) Definitions.

labeled: equipment, materials, or products to which has been affixed a label, seal, symbol, or other identifying mark of a nationally recognized testing laboratory, approved agency, or other organization concerned with product evaluation that maintains periodic inspection of the production of the ~~above~~-labeled items and whose labeling indicates either that the equipment, material, or product meets identified standards or has been tested and found suitable for a specified purpose.

2024 International Energy Conservation Code (IECC)

Section R202 General Definitions

LABELED. Equipment, materials or products to which have been affixed a label, seal, symbol or other identifying mark of a nationally recognized testing laboratory, approved agency or other organization concerned with product evaluation that maintains periodic inspection of the production of ~~thesuch~~ labeled items and whose labeling indicates either that the equipment, material or product meets identified standards or has been tested and found suitable for a specified purpose.

2024 International Energy Conservation Code (IECC)

Section C202 General Definitions

LABELED. Equipment, materials or products to which have been affixed a label, seal, symbol or other identifying mark of a nationally recognized testing laboratory, approved agency or other organization concerned with product evaluation that maintains periodic inspection of the production of the labeled items and whose labeling indicates either that the equipment, material or product meets identified standards or has been tested and found suitable for a specified purpose.

2024 International Mechanical Code (IMC)

Section 202 General Definitions

[A]LABELED. Equipment, materials or products to which have been affixed a label, seal, symbol or other identifying mark of a nationally recognized testing laboratory, approved agency or other organization concerned with product evaluation that maintains periodic

ICC GROUP A PROPOSAL CONCEPTS

ICC39 (IBC, IRC, ISPSC)

Ensure “be labeled” and “bear a label” both require third-party inspection

inspection of the production of the labeled items and whose labeling indicates either that the equipment, material or product meets identified standards or has been tested and found suitable for a specified purpose.

ICC GROUP A PROPOSAL CONCEPTS

ICC50 (IBC or IRC and IWUIC)

“Roof deck” definition alignment among codes

Overview

ARMA has previously worked on improvements to roofing terminology. This idea acknowledges the significant difference between the definitions of “roof deck” used in various codes and suggests alignment may be beneficial.

Staff Commentary

Proposed changes to definitions usually generate interest from multiple stakeholders. ARMA would coordinate with other roofing interests in hopes of presenting a united position at CAH1.

Draft Proposal

Before a proposal can be created, there must be agreement on an appropriate definition for “roof deck.” Shown below are the two definitions currently in use.

2024 International Building Code (IBC)

ROOF DECK. The flat or sloped surface constructed on top of the exterior walls of a building or other supports for the purpose of enclosing the story below, or sheltering an area, to protect it from the elements, not including its supporting members or vertical supports.

2024 International Residential Code

2024 International Wildland-Urban Interface Code

ROOF DECK. The flat or sloped surface not including its supporting members or vertical supports.

ICC GROUP A PROPOSAL CONCEPTS

ICC51 (IBC, IRC, IWUIC, IECC)

Alignment of “Roof assembly” definitions among codes

Overview

The definitions of “roof assembly” vary among the I-codes. A key difference is the presence in some codes of “ignition barrier” as a potential component. A more concerning difference is the inclusion of “interior finish” in the IECC CE definition, since it implies the structural supports beneath the roof deck are included in a roof assembly. There is debate between the roofing and wood industries about whether the defined term “roof assembly” should include the structural supports beneath the roof deck. Assuming there will continue to be attention to this term, aligning definitions is a potentially useful, defensive step.

Staff Commentary

Full alignment across all the affected codes will require proposals to change either the IBC or the IRC and IWUIC and separate work in the IECC standards development process. Changes within the IBC/IRC/IWUIC are not anticipated to be especially contentious. However, changes to the IECC are likely to meet resistance, often from parties with limited understanding of the roofing arena.

Draft Proposal

Before a draft proposal can be prepared, there must be agreement on the correct definition. Existing definitions are shown below. The table that follows compares content of the final sentence of each definition, which is where the differences exist.

2024 International Building Code (IBC)

[BS] ROOF ASSEMBLY (For application to Chapter 15 only). A system designed to provide weather protection and resistance to design loads. The system consists of a *roof covering* and *roof deck* or a single component serving as both the *roof covering* and the *roof deck*. A roof assembly can include an *underlayment*, a thermal barrier, insulation or a *vapor retarder*.

2024 International Residential Code (IRC)

[RB] ROOF ASSEMBLY. A system designed to provide weather protection and resistance to design loads. The system consists of a *roof covering* and *roof deck* or a single component serving as both the *roof covering* and the *roof deck*. A *roof assembly* can include an *underlayment*, thermal barrier, ignition barrier, insulation or a vapor retarder. For the definition applicable in Chapter 11, see Section N1101.6.

2024 International Wildland-Urban Interface Code (IWUIC)

ROOF ASSEMBLY. A system designed to provide weather protection and resistance to design loads. The system consists of a *roof covering* and *roof deck* or a single component serving as both the *roof covering* and the *roof deck*. A roof assembly can include an underlayment, thermal barrier, ignition barrier, insulation or a vapor retarder.

ICC GROUP A PROPOSAL CONCEPTS

ICC51 (IBC, IRC, IWUIC, IECC)

Alignment of “Roof assembly” definitions among codes

Draft 2027 International Energy Conservation Code (IECC) – Commercial

ROOF ASSEMBLY. A system designed to provide weather protection and resistance to design loads. The system consists of a roof covering and roof deck or a single component serving as both the roof covering and the roof deck. A *roof assembly* includes the roof covering, underlayment, roof deck insulation, vapor retarder and interior finish.

Draft 2027 International Energy Conservation Code (IECC) – Residential

ROOF ASSEMBLY. A system designed to provide weather protection and resistance to design loads. The system consists of a roof covering and roof deck or a single component serving as both the roof covering and the roof deck. A *roof assembly* includes the roof covering, underlayment and roof deck and can also include a thermal barrier, an ignition barrier, insulation or a vapor retarder.

Comparison of Last Sentence of Definitions

2024 IBC	2024 IRC	2024 IWUIC	Draft 2027 IECC CE	Draft 2027 IECC RE
A roof assembly can include	A roof assembly can include	A roof assembly can include	A roof assembly includes	A roof assembly includes
			the roof covering	the roof covering
an underlayment,	an underlayment	an underlayment	underlayment	underlayment
				and roof deck
a thermal barrier	thermal barrier	thermal barrier	roof deck insulation	and can also include a thermal barrier
	ignition barrier	Ignition barrier		an ignition barrier
insulation	insulation	insulation		insulation
or a vapor retarder.	or a vapor retarder	or a vapor retarder.	vapor retarder	or a vapor retarder
			and interior finish	

ICC GROUP A PROPOSAL CONCEPTS

ICC52 (IWUIC, IBC, IRC)

Remove “Roof covering system” as a defined term across all I-codes

Overview

ARMA worked in prior cycles to remove inconsistencies in roofing terminology, and proposals on this matter will continue that trend. In the prior cycle, ARMA addressed situations where “roof assembly” was the proper term instead of “roof covering.” With that work complete, the time is appropriate to remove “roof covering assembly” because it is no longer a needed term.

Staff Commentary

NRCA unsuccessfully attempted removal of the term from the IRC through an essentially identical proposal two cycles ago (2024 edition). Opposition was primarily based on the assertion that “roof covering system” is a widely used term in the industry. Repeating that effort may lead to success due to work ARMA completed to clarify use of “roof assembly” during the prior cycle. ARMA’s approach will differ from NRCA’s approach via attempting to make corrections in all appropriate codes.

An alternative approach would be to establish a different definition for either “roof covering system” or “roof system” to encompass everything above the roof deck, along with possible additional clarifying changes to the definitions of “roof covering” and “roof assembly.” The new term “roof system” has been added to the 9th Edition Florida Building Code, Building, which goes into effect January 1, 2027.

Draft Proposal for Group A

2024 International Wildland-Urban Interface Code

Section 202 Definitions

~~ROOF COVERING SYSTEM.~~ See “Roof assembly.”

Draft Proposal for Group B

2024 International Building Code

Section 202

~~ROOF COVERING SYSTEM.~~ See “Roof assembly.”

[BS] ROOF COATING. A fluid-applied, adhered coating used for roof maintenance or roof repair, or as a component of a ~~roof covering system~~ or roof assembly.

1507.4.3 Material standards. Metal-sheet ~~roof assemblies~~ ~~roof covering systems~~ that incorporate supporting structural members shall be designed in accordance with Chapter 22. Metal-sheet roof coverings shall comply with Table 1507.4.3.

ICC GROUP A PROPOSAL CONCEPTS

ICC52 (IWUIC, IBC, IRC)

Remove “Roof covering system” as a defined term across all I-codes

TABLE 1507.4.3 METAL ROOF COVERINGS

ROOF COVERING TYPE	STANDARD APPLICATION RATE/THICKNESS
Cold-rolled copper	ASTM B370 minimum 16 oz./sq. ft. and 12 oz./sq. ft. high yield copper for metal sheet roof coverings roof-covering systems ; 12 oz./sq. ft. for preformed metal shingle systems.
Copper	16 oz./sq. ft. for metal-sheet roof coverings roof-covering systems ; 12 oz./sq. ft. for preformed metal shingle systems

[BS] 3301.3 Roof loads. Structural roof components shall be capable of supporting the ~~roof assembly~~~~roof-covering system~~ and the material and equipment loads that will be encountered during installation of the ~~roof assembly~~~~system~~.

2024 International Residential Code

Section 202

~~[RB] ROOF COVERING SYSTEM. See “Roof assembly.”~~

~~[RB] ROOF COATING. A fluid-applied, adhered coating used for roof maintenance or roof repair, or as a component of a ~~roof covering system~~ or roof assembly.~~

R905.10.3 Material standards. Metal-sheet ~~roof coverings~~~~roof-covering systems~~ that incorporate supporting structural members shall be designed in accordance with the International Building Code. Metal-sheet roof coverings installed over structural decking shall comply with Table R905.10.3(1). The materials used for metal-sheet roof coverings shall be naturally corrosion resistant or provided with corrosion resistance in accordance with the standards and minimum thicknesses shown in Table R905.10.3(2).

TABLE R905.10.3(1) METAL ROOF COVERING STANDARDS

ROOF COVERING TYPE	STANDARD APPLICATION RATE/THICKNESS
Cold-rolled copper	ASTM B370 minimum 16 oz/sq ft and 12 oz/sq ft high-yield copper for metal-sheet roof coverings roof-covering systems ; 12 oz/sq ft for preformed metal shingle systems.

R902.8 Structural and construction loads. The structural roof components shall be capable of supporting the ~~roof assembly~~~~roof-covering system~~ and the material and equipment loads that will be encountered during installation of the ~~roof assembly~~~~roof covering system~~.

ICC GROUP A PROPOSAL CONCEPTS

ICC53 (IBC, IRC, IWUIC)

Align codes regarding Class A fire classification exceptions

Overview

The exceptions for Class A fire classification in the IWUIC are different than those in the IBC and IRC. Creating consistency among the IBC, IRC, and IWUIC is expected to be beneficial as adoption of the IWUIC is increasing. The fourth exception is for slate roof coverings with an asphalt-based underlayment.

Draft Proposal

Draft 2027 International Wildland-Urban Interface Code

504.2 Roof assembly. Roofs shall have a *roof assembly* that complies with a Class A rating when tested in accordance with ASTM E108 or UL 790.

Exceptions:

1. Class A roof assemblies include those with coverings of brick, masonry or an exposed concrete roof deck.
2. Class A roof assemblies include ferrous or copper shingles or sheets, metal sheets and shingles, clay or concrete roof tile or slate installed on noncombustible decks or ferrous, copper or metal sheets installed without a roof deck on noncombustible framing.
3. Class A roof assemblies include a minimum 16 oz/sq ft (0.0416 kg/m²) copper sheets installed over combustible roof decks.
4. Class A roof assemblies include slate installed over ASTM D226, Type II or ASTM D4869, Type IV underlayment over combustible decks.

ICC GROUP A PROPOSAL CONCEPTS

ICC54 (IWUIC)

Clarify that roof valley flashing language only applies to open valleys

Overview

The IWUIC includes specific provisions for construction of valleys. The intention of the existing language is that these provisions are only applicable to metal-lined open valleys. During the prior cycle, ARMA had partial success with an effort to clarify scope of this section, which resulted in a change in the title of the section from “Roof valleys” to “Roof valley flashings.” Further clarification may be beneficial.

Staff Commentary

If there is a need to expand open valley construction options to permit underlayments besides D3909, that may be handled via a separate proposal.

Draft Proposal

Draft 2027 International Wildland-Urban Interface Code

504.2.1 Roof valley flashings. Where roof valleys are constructed with metal valley liner flashing provided, such valley flashings shall be not less than 0.019 inch (0.48 mm) (No. 26 galvanized sheet gage) corrosion-resistant metal installed over a minimum 36-inch-wide (914 mm) underlayment consisting of one layer of 72-pound (32.4 kg) mineral-surfaced, nonperforated cap sheet complying with ASTM D3909 running the full length of the valley.

505.2.1 Roof valley flashings. Where roof valleys are constructed with metal valley liner flashing provided, such valley flashings shall be not less than 0.019 inch (0.48 mm) (No. 26 galvanized sheet gage) corrosion-resistant metal installed over a minimum 36-inch-wide (914 mm) underlayment consisting of one layer of 72-pound (32.4 kg) mineral-surfaced, nonperforated cap sheet complying with ASTM D3909 running the full length of the valley.

506.2.1 Roof valley flashings. Where roof valleys are constructed with metal valley liner flashing provided, such valley flashings shall be not less than 0.019 inch (0.48 mm) (No. 26 galvanized sheet gage) corrosion-resistant metal installed over a minimum 36-inch-wide (914 mm) underlayment consisting of one layer of 72-pound (32.4 kg) mineral-surfaced, nonperforated cap sheet complying with ASTM D3909 running the full length of the valley.

ICC GROUP A PROPOSAL CONCEPTS

ICC55 (IWUIC)

Expand valley section to address closed as well as open valleys

Overview

At present, the IWUIC has special requirements solely for open valley construction. Many aspects of roof construction are being scrutinized for resistance to embers and flames.

Staff Commentary

Class A classified roof assemblies have been used in closed valley construction for many years with no evidence of unacceptable behavior during wildfires. The absence of a fire classification test which evaluates roof assemblies in a roof valley configuration makes addressing this topic potentially challenging.

Draft Proposal

No draft proposal has been prepared, pending discussion about relevance of this topic. Language from the relevant section follows.

Draft 2027 International Wildland-Urban Interface Code

504.2.1 Roof valley flashings. Where provided, valley flashings shall be not less than 0.019 inch (0.48 mm) (No. 26 galvanized sheet gage) corrosion-resistant metal installed over a minimum 36-inch-wide (914 mm) underlayment consisting of one layer of cap sheet complying with ASTM D3909 running the full length of the valley.

ICC GROUP A PROPOSAL CONCEPTS

ICC56 (IWUIC)

Additional options for protection from flame and ember intrusion under raised roof coverings

Overview

During the prior cycle, ARMA created a separate section titled “Flame and ember protection at eaves.” The intention was to create an enumerated list of two options which could be expanded as new solutions emerged.

Staff Commentary

The third option shown in the draft proposal is based on work undertaken by the California Wildland-Urban Interface Code Roofing Subgroup.

Draft Proposal

Draft 2027 International Wildland-Urban Interface Code

504.2.2 Flame and ember protection at eaves. For *roof assemblies* where the profile allows a space between the *roof covering* and *roof deck*, the space at the eave ends shall resist flames and embers by one or more of the following methods:

1. Fireblocking of the space between the *roof covering* and the *roof deck*.
2. Installation of one layer of 72 pound (32.4 kg) mineral-surfaced, nonperforated cap sheet complying with ASTM D3909 over the combustible *roof deck*.
3. A *roof assembly* that, when tested without the *roof covering* present, passes the Class C burning brand test in accordance with ASTM E108 or UL 790.

505.2.2 Flame and ember protection at eaves. For *roof assemblies* where the profile allows a space between the *roof covering* and *roof deck*, the space at the eave ends shall resist flames and embers by one or more of the following methods:

1. Fireblocking of the space between the *roof covering* and the *roof deck*.
2. Installation of one layer of 72 pound (32.4 kg) mineral-surfaced, nonperforated cap sheet complying with ASTM D3909 over the combustible *roof deck*.
3. A *roof assembly* that, when tested without the *roof covering* present, passes the Class C burning brand test in accordance with ASTM E108 or UL 790.

506.2.2 Flame and ember protection at eaves. For *roof assemblies* where the profile allows a space between the *roof covering* and *roof deck*, the space at the eave ends shall resist flames and embers by one or more of the following methods:

1. Fireblocking of the space between the *roof covering* and the *roof deck*.
2. Installation of one layer of 72 pound (32.4 kg) mineral-surfaced, nonperforated cap sheet complying with ASTM D3909 over the combustible *roof deck*.
3. A *roof assembly* that, when tested without the *roof covering* present, passes the Class C burning brand test in accordance with ASTM E108 or UL 790.

ICC GROUP A PROPOSAL CONCEPTS

ICC57 (IWUIC)

Ensure that the exceptions in the three WUI Construction Classes provide equivalent performance to the Class A classification

Overview

A stakeholder working on WUI issues approached ARMA with a question about the equivalence of the exceptions to the Class A fire resistance requirements, which caused ARMA staff to review the provisions.

Staff Commentary

During the prior cycle, the general requirement for WUI Construction Class 3 was increased from Class B to Class A. However, there was no change in the Exceptions, which still permit installation of any noncombustible roof covering over a combustible deck. Do the constructions in the exceptions provide Class A fire resistance?

Draft Proposal

No draft proposal has been prepared, pending discussion and input on this topic. The relevant code sections are shown below.

Draft 2027 International Wildland-Urban Interface Code

504.2 Roof assembly. Roofs shall have a *roof assembly* classified as Class A when tested in accordance with ASTM E108 or UL 790.

Exceptions:

1. Class A roof assemblies include those with coverings of brick, masonry or an exposed concrete roof deck.
2. Class A roof assemblies also include ferrous or copper shingles or sheets, metal sheets and shingles, clay or concrete roof tile or slate installed on noncombustible decks or ferrous, copper or metal sheets installed without a roof deck on noncombustible framing.
3. Class A roof assemblies include minimum 16 oz/sq ft (0.0416 kg/m) copper sheets installed over combustible roof decks.

505.2 Roof assembly. Roofs shall have a *roof assembly* classified as Class A when tested in accordance with ASTM E108 or UL 790 or an *approved noncombustible roof covering*.

506.2 Roof assembly. Roofs shall have a *roof assembly* classified as Class A when tested in accordance with ASTM E108 or UL 790 or an *approved noncombustible roof covering*.

ICC GROUP A PROPOSAL CONCEPTS

ICC58 (IBC)

Fire classification of landscaped roofs

Overview

A new definition of “landscaped roof” was added to the 2024 IBC, and the existing definition of “vegetative roof” was modified. The intent was to clarify the difference between vegetative and landscaped roofs. The unintended result is that existing provisions now imply that landscaped roofs are required to be fire classified with the landscaping appurtenances present.

Staff Commentary

Advancing this proposal aligns with ongoing ARMA efforts to clarify fire classification requirements.

Draft Proposal

2024 International Building Code

[BS] LANDSCAPED ROOF. An area over a roof assembly incorporating planters, vegetation, hardscaping or other similar decorative appurtenances that are not part of the roof assembly.

[BS] VEGETATIVE ROOF. A roof assembly of interacting components designed to waterproof a *building's* top surface that includes, by design, a vegetative surface.

[BF] 1505.10 Landscaped and vegetative roofs. *Landscaped roofs* ~~Landscaped~~ and *vegetative roofs* shall comply with Sections ~~1505.1 and~~ 1507.15. *The roof assembly underlying a landscaped roof shall comply with 1505.1.* Vegetative roofs *shall comply with Section 1505.1 and* shall be installed in accordance with ANSI/SPRI VF-1.

1507.15 Vegetative roofs and landscaped roofs. *Vegetative roofs and landscaped roofs* shall comply with the requirements of this chapter, Section 1607.14 and the International Fire Code.

2024 International Fire Code

317.2 General. Vegetative roofs and landscaped roofs shall comply with Sections 1505 and 1507.15 of the *International Building Code* and be installed and maintained in accordance with Section 317.2 through 317.4.

ICC GROUP A PROPOSAL CONCEPTS

ICC59 (IBC)

Correct “roofing assembly” in Section 2603.6

Overview

In the prior cycle (FS19-24), ARMA made corrections to roofing terminology, including corrections related to use of the term “roof assembly.” IBC Section 2603.6 appears to have been overlooked.

Draft Proposal

2024 International Building Code

2603.6 Roofing. Foam plastic insulation meeting the requirements of Sections 2603.2, 2603.3 and 2603.4 shall be permitted as part of a ~~roof assembly~~~~roof-covering assembly~~, provided that the assembly with the foam plastic insulation is a Class A, B or C ~~roof assembly~~~~roofing assembly~~ where tested in accordance with ASTM E108 or UL 790.

ICC GROUP A PROPOSAL CONCEPTS

ICC60 (IBC, IECC)

Align definitions of “emittance” among the codes

Overview

During development of the 2024 IECC, an effort to add the IBC definition of “emittance” into the IECC led to an assertion that use of “blackbody” in the existing definition had racial connotations. A compromise definition was accepted for the IECC, resulting in different definitions between the IECC and IBC.

Staff Commentary

The key question is whether the new definition is technically valid.

Draft Proposal

The respective definitions are shown below.

2024 International Building Code

[BF] EMITTANCE. The ratio of radiant heat flux emitted by a specimen to that emitted by a blackbody at the same temperature and under the same conditions.

2024 International Energy Conservation Code

EMITTANCE. The ratio of the radiant heat flux emitted by a specimen measured on a scale from 0 to 1, where a value of 1 indicates perfect release of thermal radiation.

ICC GROUP A CODE DEVELOPMENT

TECHNICAL COMMITTEE CONCEPT PRIORITIZATION WORKSHEET | SEPTEMBER 14, 2026

Date:	Monday, September 14, 2026	Co-Chairs:	Greg Keeler, Randy Frank
Time:	2:30 PM – 3:30 PM EDT	Location:	DoubleTree Washington Dulles Airport, Herndon, VA

Instructions for Committee Members: Use this worksheet during the Group A concepts review session. For each item, discuss the proposed code change direction, indicate your company's consensus priority level (High, Medium, Low, or Drop), and note any specific assignees or immediate action items required for ARMA staff to draft or coordinate proposals ahead of the ICC submittal deadlines.

General Discussion Notes & Meeting Goals: Use this space to record overall goals, attendee roll call, or major overarching priorities established before diving into individual code section reviews.

1. MULTIPLE CODES UNIFICATION (IWUIC, IBC, IRC)

Proposed Concept Details & Reference Sections	Prioritization & Notes
ICC39. Implications of "label", "be labeled", and "bear a label" Modify the definitions to clarify that both phrases require third-party inspection. This was previously discussed but tabled; will require coordinating proposals in both Groups A and Group B. References: IBC Definitions, Section 1703.5; IRC Definitions Pages 1-5 of support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions: _____ _____
ICC50. Consistency of "roof deck" definition Align the definitions of "roof deck" across the IBC, IRC, and IWUIC to resolve current discrepancies. References: IBC, IRC, and IWUIC Definitions Page 6 of the support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions: _____ _____
ICC51. Consistency of "roof assembly" definition Align the definitions of "roof assembly" to ensure identical terminology across the three primary codes. References: IBC, IRC, and IWUIC Definitions Pages 7-8 of the support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions: _____ _____
ICC52. Remove the term "roof covering system" from definitions Eliminate the redundant term "roof covering system" which creates confusion. It is unused in the IWUIC but appears five times in both the IBC and IRC, requiring systematic evaluation. References: IWUIC, IBC, and IRC Definitions Pages 9-10 of the support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions: _____ _____
ICC53. Fire Classification Exceptions Alignment Align IWUIC Section 504.2 with the IBC/IRC by evaluating the omission of the fourth Class A exception (slate installed over ASTM D226 or D4869 on a combustible deck) in the IWUIC. References: IWUIC Section 504.2 Page 11 of the support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions: _____ _____

2. INTERNATIONAL WILDLAND-URBAN INTERFACE CODE (IWUIC) CONCEPTS

Proposed Concept Details & Reference Sections	Prioritization & Notes
ICC54. Valley Flashing Scope Clarification Further clarify that Chapter 5 roof valley provisions apply only to metal-lined open valleys (continuing clarifications started in the prior cycle). References: IWUIC Section 504.2.1 Page 12 of the support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions:
ICC55. Expansion of Valley Provisions to Closed Valleys As an alternative to the item above, expand the roof valley section to address both open and closed valleys (e.g., explicitly permitting Class A fire-classified systems to extend through valleys). References: IWUIC Section 504.2.1 Page 13 of the support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions:
ICC56. Flame and Ember Intrusion Protection Evaluate whether there are additional technical options to consider beyond the prior cycle's fireblocking options or the installation of ASTM D3909 underlayment over combustible roof decks. References: IWUIC Section 504.2.2 Page 14 of the support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions:
ICC57. WUI Construction Classes - Fire Requirement Exceptions Asphalt shingles require Class A across all WUI Construction Classes. Noncombustible coverings are currently permitted in classes 2 and 3 regardless of the assembly. Evaluate if this delivers equivalent fire resistance. References: IWUIC Sections 504.2, 505.2, and 506.2 Page 15 of the support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions:

3. INTERNATIONAL BUILDING CODE (IBC) CONCEPTS

Proposed Concept Details & Reference Sections	Prioritization & Notes
ICC58. Fire Classification of Landscaped & Vegetative Roofs Both types of roofs are defined differently across I-codes but are governed by IBC Section 1505.10. Evaluate whether landscaped roofs should require fire classification; modifications may be needed in the IFC and IBC. References: IBC Section 1505.10; IFC Definitions Page 16 of the support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions: _____ _____
ICC59. Standardize "roof assembly" terminology Change the phrasing of "roofing assembly" to "roof assembly" in Section 2603.6 to ensure consistent use of technical roofing terminology aligned with prior cycle standards. References: IBC Section 2603.6 Page 17 of the support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions: _____ _____
ICC60. Align "emittance" Definition Resolve inconsistency between the IBC and the 2024 edition of the IECC, which modified the definition of emittance. References: IBC Definitions; 2024 IECC Page 18 of the support material	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions: _____ _____

4. EXTERNAL DEVELOPER IDEAS & TECHNICAL CLEAN-UP

Proposed Concept Details & Reference Sections	Committee Prioritization & Notes
1. Stantec Proposals (Milad Shabanian) Evaluate external concepts being developed regarding: (a) Fire retardant-treated wood roof coverings, (b) WUI construction classes, (c) "Prepared" roof covering (integrating ASTM E108 terminology), and (d) Resolving "roof assembly" wood/asphalt industry conflicts. References: Industry Outreach & Coordination	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions: _____ _____ _____
2. IWUIC Ventilation Section Rewrite (Kevin Scott) Review and respond to the independent rewrite of the IWUIC ventilation sections being proposed by Kevin Scott. References: IWUIC Chapter 5 / Ventilation Coordination	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions: _____ _____ _____
3. Staff Clean-up & Reference Auditing Audit the codes to: (a) Replace any remaining instances of "manufacturer's approved instructions", (b) Identify "roof covering" references that should be updated to "roof assembly", (c) Replace Class A "rating" with "classification", and (d) Update referenced standards in the IWUIC. References: Internal Technical Staff Audits	Priority Level: ☐ High ☐ Medium ☐ Low ☐ Drop Notes/Actions: _____ _____ _____