



Inspection and Technical Services

Manufactured Homes under the Manitoba Building Code

ITS 25-007

This bulletin explains how the Manitoba Building Code (MBC) applies to manufactured homes.

“Land authorities” in this bulletin includes municipalities, planning districts, provincial parks and lands regulated by Municipal and Northern Relations (MNR).

“Manufactured homes” in this bulletin includes homes built to CSA Z240 MH Series “Manufactured homes”, mobile homes, ready to move (RTM) homes, and modular homes.

Manitoba Building Code application to manufactured homes

Manufactured homes are “buildings” as defined under The Buildings Act (Act) and must follow the Manitoba Building Code (MBC).

Sentence 1.1.1.1.(2) of Division A of the MBC specifies that the MBC “applies to both site-built and factory-constructed buildings”.

Section 4 of the Act requires municipalities to adopt and enforce the MBC.

While manufactured homes are generally treated like other buildings under the Act and MBC, land authorities and homeowners should be aware of issues that may come up when these homes are built off-site and then moved.

Determining compliance

The Act and MBC apply to the construction, erection, placement, alteration, repair, renovation, demolition, relocation, or removal of any building. As with any building, land authorities enforce MBC compliance through permits and inspections under local by-laws, policies, and procedures.

Homeowners must consult their land authority before doing any regulated work, including moving a manufactured home to a property, to understand permit and compliance requirements.

Common scenarios

This section addresses the most common scenarios a homeowner may encounter when purchasing, constructing or moving a manufactured home.

For each of the following scenarios, **homeowners must confirm permit and documentation requirements with their land authority**

1) Buying a manufactured home already on a site without being moved (with or without a certification label):

- The MBC does not apply, and no building code enforcement is required.

2) Moving a new manufactured home to a site:

- If the manufactured home is built in a facility certified to the CSA A277, “Procedure for certification of prefabricated buildings, modules, and panels” standard, then applicable labeling and documentation may be used by the land authority to support their permitting and inspections processes.
- The CSA A277 ensures that buildings meet provincial codes and standards including the MBC (as with RTMs and modular housing) or the CSA Z240 MH Series (for manufactured homes), through a nationally recognized quality assurance process (see Appendix for further information).
- Inspection and Technical Services considers CSA Z240 MH Series manufactured homes to meet the intent of the MBC and land authorities can usually accept them.
- Alternately, with RTM and modular housing, a land authority may enforce the MBC by arranging their own staged inspections while the manufactured home is being constructed off-site, as well as requiring relevant engineering or technical assessments and documentation.
- Homeowners must confirm permit and documentation requirements with their land authority.

3) Moving a used manufactured home to a new site:

- If the manufactured home still contains the appropriate CSA labeling or supporting documentation, then the land authority may rely on these resources to support their permitting and inspections processes; however, a CSA label is not a requirement under the MBC or the Act.
- If no CSA label or documentation is available, or if the land authority believes the manufactured home does not meet the MBC, then the land authority may require further engineering or technical reports.
- CSA certification processes (A277 or Z240 MH Series) only apply to work completed in the certified manufacturing facility. Homes cannot be “re-certified” after it leaves the manufacturing facility.
- Homeowners must confirm permit and documentation requirements with their land authority.

4) A home is damaged in transit, on site, or undergoes an alteration:

- The land authority may require further engineering or technical assessments and documentation to support their permitting and inspection processes.
- The building inspector may require covered building elements to be uncovered to inspect for deficiencies.
- CSA certification processes (A277 or Z240 MH Series) only apply to work completed in the certified manufacturing facility. Homes cannot be “re-certified” after it leaves the manufacturing facility.
- Homeowners must confirm permit and documentation requirements with their land authority.

Electrical requirements

The City of Winnipeg enforces electrical code requirements within its boundaries, while Manitoba Hydro enforces electrical code requirements outside of the City of Winnipeg. Please enquire with the electrical code authority within your jurisdiction for electrical permitting requirements.

Inspection and Technical Services does not issue electrical permits or labels for buildings that are connected to an electrical utility.

Federally regulated lands

First nations land under federal jurisdiction are not subject to the Act or the MBC. For inquiries regarding these areas, please contact the jurisdiction where the manufactured home will be located.

Further information

- Please contact the Building Code Section of Inspection and Technical Services at 204-945-3373 with any questions or for clarifications regarding this bulletin.
- Please contact your local land authority for questions regarding permitting and zoning requirements.
- Refer to ITS 22-011 for additional information on the Roles and Responsibilities within The Buildings Act.

Appendix

The National Building Code (NBC) offers the following appendix information regarding CSA A277 and the CSA Z240 MH Series:

A-1.1.1.1.(2) Factory-Constructed Buildings. The NBC applies the same requirements to site-built and factory-constructed buildings. However, it can often be difficult to determine whether a factory-constructed building complies with the Code once it has been delivered to the construction site because many of the wall, roof and floor assemblies are closed in and so their components cannot be inspected. CSA A277, “Procedure for certification of prefabricated buildings, modules, and panels,” was developed to address this problem with regard to residential, commercial and industrial buildings. This standard describes a procedure whereby an independent certification agency can review the quality control procedures of a factory and make periodic unannounced inspections of its products. The standard is not a building code, only a procedure for certifying compliance of factory-constructed components with a building code or other standard. If a factory-constructed building bears the label of an accredited certification agency indicating that compliance with the National Building Code has been certified using the CSA A277 procedure, the accepting authority will have some assurance that the concealed components do not require re-inspection on site.

On the other hand, standards in the CSA Z240 MH Series, “Manufactured homes,” do resemble a building code. Most of the individual standards in the series contain requirements regarding many issues also covered in the NBC. Some of these Z240 MH Series provisions are performance requirements with no quantitative criteria, some simply reference the applicable NBC requirements, while others contain requirements that differ from those in the NBC. Because it would be illogical to have two different sets of requirements for buildings—one set that applies to site-built buildings and one set that applies to factory-constructed buildings—the NBC does not reference these Z240 MH Series standards. One of the individual standards in the Z240 MH Series deals with special requirements for manufactured homes related to the fact that these houses must be moved over roads, which is an issue the NBC does not address. Therefore, labeling that indicates that a factory-constructed house complies with the Z240 MH Series standards can NOT be taken as an indication that the house necessarily complies with the building code in effect for the location where the house will be sited.

The NBC does reference CSA Z240.10.1, “Site preparation, foundation, and installation of buildings,” which is not actually part of the CSA Z240 MH Series. This standard contains requirements for surface foundations where buildings—not just houses—comply with the deformation resistance test provided in CSA Z240.2.1, “Structural requirements for manufactured homes.”