



20th April 2023

Dear Karl Aittaniemi and ANSI,

Re: Objection to PINS ICC/THIA Standard 1215

The Australian Tiny House Association (ATHA), is writing to the International Code Council and ANSI to lodge a complaint to the Project Initiation Notification System issued for *ICC/THIA Standard 1215: Design, Construction, Inspection and Regulation of Tiny Houses for Permanent Occupancy* and we request its removal.

The proposed standard seeks to duplicate the work of the ASTM E06-26 Tiny House Sub-Committee and associated task groups, of which 6 have currently been established. ASTM E6-26 was approved by COTCO in October 2022, after significant delay hearing claims of duplication by ICC and THIA.

ICC and THIA have never notified or consulted with members of ASTM E06-26 about the work that has been clearly occurring behind the scenes. There have been many opportunities to communicate this work to ASTM members, whilst being on calls throughout the entire process of scoping the proposal for ASTM and the subsequent appointment of ASTM E06-26.

The PINS application appears to not reflect ANSI Due Process, for consensus procedures and unlike the ICC Press Release stating "*The standard will be developed through the Code Council's ANSI consensus procedures, requiring essential engagement from all industry stakeholders and allowing for an in-depth examination of technical or emerging issues*" there is no evidence of engagement to date from all industry stakeholders. ATHA has been part of the ASTM discussions and process since January 2020 and we have never been approached by ICC or THIA to communicate their intentions or seek our input.

To suggest the ICC/THIA standard "*will be more readily adoptable internationally and in jurisdictions that do not use the IRC as its base code*", shows no regard to the international contribution to the ASTM process and Standard development to date and little regard for Code structures and Standards in jurisdictions other than North America.

In addition the statement - *“The standard complements the work of ASTM’s recently established [E06.26 Subcommittee on Tiny Houses](#) by combining existing criteria for tiny houses used for permanent occupancy into a single, referenceable location”* is rejected, as there is no evidence that ICC and THIA are seeking to complement the work of ASTM, rather, the intention seems to be to compete directly in this Standards space which can only lead to confusion for end users.

The ICC Press Release stated *“Ryan Colker, Code Council Vice President of Innovation, David Tompos, President of ICC-NTA, and Brad Wiseman, CEO and Board Chairman of THIA, are members of this ASTM subcommittee”* whilst correct, this statement creates the impression that they are engaging with members of the ASTM Committee and ATHA has not observed this to be the case.


For ICC and THIA to suggest that *“This joint effort with the Code Council will go a long way in helping to clear the confusion within the regulatory and tiny home builder community,”* is disingenuous.

ATHA does not support the duplication of the ICC/THIA Standard for tiny houses and we have removed all references to Appendix Q, from our Tiny House Construction Guide to eliminate any perception of involvement with ICC and THIA.

ATHA respectfully requests that the PINS notice be removed and that ICC and THIA actively and genuinely collaborate on ASTM E06.26 sub-committee Tiny House Standards.

Please do not hesitate to reach out and see how we can work together on ASTM E06-26.

Kind regards



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Together we are stronger, divided we fall!