

**Florida Building Code Binding Interpretation**

**Report Number 186**

**Date: July 7, 2020**

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**Code Edition: 6th Edition (2017)**

**Florida Building Code, Existing Building Section 706.3**

**Text of code provisions:**

**[BS] 706.3 Recovering versus replacement.** New roof coverings shall not be installed without first removing all existing layers of roof coverings down to the roof deck where any of the following conditions occur:

1. Where the existing roof or roof covering is water soaked or has deteriorated to the point that the existing

roof or roof covering is not adequate as a base for additional roofing.

2. Where the existing roof covering is wood shake, slate, clay, cement or asbestos-cement tile.

3. Where the existing roof has two or more applications of any type of roof covering.

4. When blisters exist in any roofing, unless blisters are cut or scraped open and remaining materials secured

down before applying additional roofing.

5. Where the existing roof is to be used for attachment for a new roof system and compliance with the securement provisions of Section 1504.1 of the *Florida Building Code, Building* cannot be met.

Appeal question(s) requesting a response:

1. Is recovering of an existing shingle roof as noted [in Fl. Existing Building Code Sec 706.3] [an] acceptable means?
2. Does] the code restrict the ability of a homeowner to recover [existing shingle roof] even when section 1504 is not met due to the roof not being removed?
3. Since the [existing] shingles are not being removed, [is] recovering allowed?

Answers:

1. Yes
2. No, subject to the criteria listed in paragraphs 1-5 in FBC, Existing Buildings Sec 706.3
3. Yes

**Comment:** FBC, Existing Buildings Sec 706.3, paragraph 5 is a condition that does not apply because the existing roof is not being used for attachment for a “new roof system”. A “new roof system” has been interpreted as a new roof assembly and is not specifically defined in the Code, which has created confusion in the interpretation of this provision. If it was intended that paragraph 5 be met including the provisions for wind load attachments in FBC Section 1504 then it will not be possible to perform any reroofing over an existing shingle roof and would thereby render FBC, Existing Buildings Sec 706.3 Recovering versus replacement void and of no effect. This is clearly not the intent of this Code section.

NOTICE:

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, and the Florida Department of Business & Professional Regulation, provides this interpretation of the Florida Building Code in the interest of consistency and application of the Building Code statewide. This interpretation is binding and not subject to acceptance and approval by the local building official.