

---

# Inspection and certification of fire safety systems installation

## Overview

In 2017, Building Ministers authorised an assessment of the effectiveness of compliance and enforcement systems for the Australian building and construction industry. Recommendation 19 of the resulting **Building Confidence Report** <[https://www.industry.gov.au/sites/default/files/July%202018/document/pdf/building\\_ministers\\_forum\\_expert\\_assessment\\_-\\_building\\_confidence.pdf](https://www.industry.gov.au/sites/default/files/July%202018/document/pdf/building_ministers_forum_expert_assessment_-_building_confidence.pdf)> (BCR) is that each jurisdiction requires registered fire safety practitioners to design, install and certify the fire safety systems necessary in commercial buildings.

In response, the BCR Implementation Team within the Australian Building Codes Board (ABCB) Office is developing national model guidance to provide assistance to governments and industry, and to facilitate national consistency.

The paper is presented as five principles, which are considered fundamental to the installation, testing, certification and maintenance of fire safety systems. The paper also provides context and objectives to support each principle.

Finally, the paper recommends a number of matters to be considered by stakeholders. Stakeholder input will assist in the development of model guidance and will provide a robust, transparent and a nationally consistent model to the inspection and certification of fire safety systems installation. The national model guidance will be considered by Building Ministers toward the end of the year.

You can access the full discussion paper below or download a copy at the bottom of this page. You can also access a preview of the consultation via the 'consultation preview' attachment at the bottom of this page.



## Why we are consulting

BCR recommendation 19 and the installation, testing, certification and maintenance of fire safety systems, impacts building occupant safety.

The requirement to test, inspect, certify and maintain fire safety systems aims to:

- detect any observable non-compliance issues
- ensure that the systems are installed in accordance with the relevant approvals, plans and specifications of the design
- ensure the building is compliant with the NCC and applicable standards including any other relevant jurisdictional requirements
- ensure the building is suitable for occupation and use prior to an occupancy certificate being issued, and
- ensure that the building continues to operate as design through ongoing inspection and maintenance.

This discussion paper acknowledges the interdependencies associated with the BCR recommendations. It also reflects on those matters relating to recommendation 19 that have been addressed in response to other BCR recommendations. The paper explores the outstanding matters identified in recommendation 19. It does not cover fire system design matters such as fire brigade vehicular access as it is not considered to be a system requiring independent installation, testing and commissioning.

Stakeholder feedback on proposed minimum requirements for this recommendation is essential to informing the development of appropriate guidance for jurisdictions to consider.

## Information Collection

**1 Important:** Please ensure that you have read and understood the below statements before proceeding

### **Privacy Collection Statement**

The Australian Building Codes Board (ABCB) is bound by the Australian Privacy Principles (APPs) outlined in Schedule 1 of the *Privacy Act 1988* (Cth) (Privacy Act), which regulates how entities may collect, use, disclose and store personal information.

Your personal and sensitive information is being collected by the ABCB Office to assist the ABCB to carry out its functions, to inform the consultation process and for other purposes including to communicate with individuals or organisations about their submission.

The personal and sensitive information collected as part of the submission process may be disclosed to and used by the following individuals or organisations:

- the Department of Industry, Science, Energy and Resources or the ABCB Office, and the staff of the Department and the ABCB Office;
- the ABCB, its committees and any working groups established by the ABCB, and their staff and advisors;
- the Commonwealth Government, and State and Territory Ministers responsible for building regulation and policy, and their staff and advisors;
- other Commonwealth or State and Territory government departments and agencies;
- any consultant or contractor engaged by the ABCB for the purpose of undertaking work in respect of the subject matter of the submission process.
- any organisation for any authorised purpose with your express consent, for the purposes set out above.

Personal and sensitive information obtained will be stored and held in accordance with the ABCB's obligations under the *Archives Act 1983* (Cth). Further information about how the ABCB collects, uses and discloses personal information is set out in its **Privacy Policy** <<https://abcb.gov.au/Footer/Privacy>> .

If you have an enquiry or request relating to your personal information, please contact:

Privacy Contact Officer  
Australian Building Codes Board  
GPO Box 2013  
Canberra ACT 2601

## Confidential Information Statement

All submissions and comments will be published unless they are marked 'commercial-in-confidence'. However, any contact details you provide within your submission will be redacted prior to the submission being published.

In order to promote debate and transparency, the ABCB prefers that all submissions and comments be provided in a way that does not require confidentiality to be maintained. However, it recognises that in some circumstances you may want to provide information in confidence.

It is the responsibility of the person making the submission to ensure that any 'commercial-in-confidence' information is clearly identified. Please consider if you can structure your response to keep only some parts confidential. If only part of your submission is confidential, you can provide the confidential part as a separate submission so that the ABCB can publish the non-confidential part of the submission.

Where confidentiality is requested for an entire submission, it will not be published by the ABCB, nor will your name or organisation details; however, see the comments below regarding Regulation Impact Statements.

Please note that we may still disclose the confidential part of your submission to any of the above identified users of the information as part of the consultation process and we will use reasonable efforts to ensure that the recipients keep the submission confidential.

Submissions for Regulation Impact Statements will be made public in accordance with the Council of Australian Government's **Best Practice Regulation: A Guide for Ministerial Councils and National Standard Setting Bodies** <<https://www.pmc.gov.au/resource-centre/regulation/best-practice-regulation-guide-ministerial-councils-and-national-standard-setting-bodies>> . A summary of the views expressed in the submissions will be published as part of the Regulation Impact Statement.

The ABCB or the ABCB Office may also disclose confidential information in circumstances where:

- we are required or authorised by law disclose it;
- you agree to the information being disclosed; or
- someone other than you has made the confidential information public.

Your submission, comments, opinions and responses will not be published if the ABCB or the ABCB Office considers that your submission, comments, opinions and responses may contain potentially defamatory statements or other offensive comments.

**2** By making a submission to this consultation you agree to the collection of the information you provide in your submission; and the use and disclosure of the information you provide in your submission as outlined above.

(Required)

*Please select only one item*

- Publish response
- Publish response anonymously (this will remove personal identifiers including, name and organisation)
- Do not publish

## Introduction

### 3 What is your name?

Name (Required)

### 4 What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

Email (Required)

### 5 On whose behalf are you making this submission?

(Required)

*Please select only one item*

- I am making this submission on my own behalf     I am making this submission on behalf of a business  
 I am making this submission on behalf of an industry body  
 I am making this submission on behalf of a government agency

### 6 What is your organisation?

Organisation (Required)

### 7 Which best describes your industry sector?

(Required)

*Please select only one item*

- Building Commercial     Building Residential     Building Commercial and Residential  
 Building and plumbing products     Building Certification/ Surveying     Architecture and design  
 Engineering     Plumbing     Compliance, testing and accreditation     Legal and Finance  
 Specialist - disability access     Specialist - energy efficiency     Specialist - fire safety  
 Specialist - health     Specialist - hydraulic/ plumbing     Student/ apprentices  
 Trades and other construction services     Education     Community and Non-Government organisations  
 Government     General Public     Other

### 8 Please select your State or Territory

(Required)

*Please select only one item*

- ACT     NSW     NT     Qld     SA     Tas     Vic     WA

# Principle 1- Installation and testing, certification and maintenance of nominated fire safety systems is regulated

BCR Recommendation 19

## Principle 1- Installation and testing, certification and maintenance of nominated fire safety systems is regulated

### Objective

That the installation and testing, certification and maintenance of specific fire safety systems is regulated by governments.

### Context

Fire safety systems are not uniformly inspected across commercial buildings in Australia. Where inspected, compliance is generally determined by the *statutory building surveyor*. While it is common for the *statutory building surveyor* to require

**9** Do you agree that the installation and testing, certification and maintenance of the fire safety systems listed in Attachment A should be regulated?

Please select only one item

Yes  No  Unsure

If No/Unsure, please provide alternative approaches

**10** Are there any additional fire safety systems not captured in the list?

*Please select only one item*

Yes  No  Unsure

If Yes/Unsure, list the other fire safety systems

**11** Do you agree that fire extinguishers and/or mechanical air handling systems do not require a declaration of installation compliance unless where requested by the statutory building surveyor?

*Please select only one item*

Yes  No  Unsure

If No, provide alternative suggestions on how these systems should be regulated for installation, testing and certification.

## Principle 2- Installation and testing of fire safety systems is undertaken by registered practitioners

BCR Recommendation 19

### Consultation Questions

1. Do you agree that the installation and testing, certification and maintenance of the fire safety systems listed in **Attachment A** should be regulated?
2. Are there any additional fire safety systems not captured in the list? If so, what are they?
3. Do you agree that fire extinguishers and/or mechanical air handling systems do not require a *declaration of installation compliance* unless where requested by the *statutory building surveyor*? If no, provide alternative suggestions on how these systems should be regulated for installation, testing and certification.

**Principle 2- Installation and testing of fire safety systems is**

**12** Do you agree with the recommendation that the fire system installer or plumber must test the installed fire safety systems and provide a Declaration of Installation Compliance?

Please select only one item

Yes  No  Unsure

If No/Unsure, please provide alternative suggestions.

Principle 3 – Certification of fire safety systems is mandatory and is undertaken by independent and registered practitioners

BCR Recommendation 19

**Principle 3 – Certification of fire safety systems is mandatory and is undertaken by independent and registered practitioners**

**Objective**

That registered and competent *practitioners* as per the NRF<sup>9</sup>, who have not participated in the original installation and testing of fire safety systems, undertake mandatory, independent certification of fire safety systems.

**Context**

As described in the BCR, it is important that installed fire safety systems are subject to independent certification to ensure they perform as designed in the event of a fire. An

**13** Do you agree that the certification of the fire safety systems listed in Attachment A, should be undertaken by an independent and registered fire systems installer or plumber?

*Please select only one item*

Yes  No  Unsure

If No/Unsure, please provide further comment.

**14** Should the independent certification be undertaken by a fire systems installer or plumber with a Certificate IV qualification or should any additional qualification requirements be left to the discretion of the individual jurisdiction?

**15** Are the requirements for an independent fire systems installer or plumber adequate to ensure no conflict of interest and independence exists between the original fire systems installer or plumber and independent fire systems installer or plumber?

*Please select only one item*

Yes    No    Unsure

If No/Unsure, please provide further comment.

**16** Should the independent fire systems installer or plumber be independent of the entity (e.g. company or business) that performed the installation or can it be another employee from the same entity?

*Please select only one item*

Can be from the same entity    Must be independent of the entity that performed the installation

Provide further comment

**17** Do you agree that the owner or building approval applicant should engage the independent fire systems installer or plumber, ensuring they are competent and registered as per the NRF?

Please select only one item

Yes  No  Unsure

If No/Unsure, please provide further comment.

**Principle 4 – Statutory building surveyor is responsible for inspecting certified fire safety systems prior to issuing an occupancy approval or final certificate**

BCR Recommendation 19

**Principle 4 – Statutory building surveyor is responsible for inspecting certified fire safety systems prior to issuing an occupancy approval or final certificate**

**Objective**

That the *statutory building surveyor* visually inspects the fire safety systems as part of the *building approval* process and prior to issuing an *occupancy approval* or final certificate.

**Context**

**18** Do you agree on the role of the statutory building surveyor in relation to visual inspections of certified fire safety systems installation?

*Please select only one item*

Yes  No  Unsure

If No/Unsure, please provide alternative suggestions

**19** Should a fire safety designer (fire safety engineer) undertake the inspection of fire safety systems involving Performance Solutions prior to occupancy approval or should this be the role of the statutory building surveyor?

*Please select all that apply*

Fire safety designer (fire safety engineer)  Statutory building surveyor

Further comment

Principle 5 – Routine maintenance of essential fire safety systems is regulated, undertaken by registered practitioners and reported to the building regulator annually

BCR Recommendation 19

the role of the *statutory building surveyor*? If no, provide suggested alternatives.

**Principle 5 – Routine maintenance of essential fire safety systems is regulated, undertaken by registered practitioners and reported to the building regulator annually**

### Objective

That essential fire safety systems are regularly maintained to ensure they continue to operate as designed in Class 2-9 buildings.

**Context**

**20** Do you agree that the occupancy approval should state which fire safety systems must be maintained and to which standard and maintenance interval?

*Please select only one item*

Yes  No  Unsure

Provide comments

**21** Do you agree that the maintenance of specified fire safety systems should only be undertaken by registered fire systems installers or plumber?

*Please select only one item*

Yes  No  Unsure

If No/Unsure, please provide further comment.

**22** Do you agree that annual maintenance statements should be prepared and lodged with the state or territory building regulator for Class 2-9 buildings?

*Please select only one item*

Yes  No  Unsure

If No/Unsure, please provide further comment.

## Comments

**23** Do you have any further comments?