

CN15030 - 31 August 2015

Committee Secretary  
Senate Legal and Constitutional Affairs Committee  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600



Dear Madam/Sir

**Re: *Senate Inquiry into the use of smoke alarms to prevent smoke and fire related deaths***

The National Fire Industry Association (NFIA) welcomes the opportunity to provide a submission to the Senate into the use of smoke alarms to prevent smoke and fire related deaths.

The NFIA is the leading Australian fire protection contracting industry association that represents a wide and varied membership from the smallest subcontractor through to large national and international organisations. Our aim is to maximise the industry's potential to deliver world-leading services and fire life safety systems.

Since 1926, NFIA has been committed to the delivery of competent persons to both fire protection industry and the Australian community on all aspects of fire protection safety and are actively involved at both the national and state level.

NFIA believes that an appropriate regulatory framework should be one that protects the safety of the community and property, provides adequate consumer protection and recognises and accommodates industry practice and is linked to the national training package framework.

NFIA prefaces our comments by noting they are reflective of the situation in the domestic/residential sector of the industry. Alarm systems in commercial/industrial environments are subject to a greater degree of oversight than that provided in the domestic/residential sector.

*a) the incidence of smoke and fire related injuries and death is and associated damage to property*

The statistics relating to this heading are collected through government services reporting and we would refer you to the 2015 [Report on Government Services produced by the Productivity Commission](#) in this regard.

b) *the immediate and long-term effects of such injuries and death*

Existing information, which may assist this enquiry, are submissions to and outcomes of the [House of Representatives Standing Committee on Health and Ageing's Roundtable Forum on Burns Prevention \(2010\)](#)

c) *how the use, type and installation setups of smoke alarms could affect such injuries and deaths*

The Australian Building Codes Board commissioned Victorian University to undertake a project re smoke alarms in residential dwellings that was released in 2010 and that report contains information which would assist the inquiry, together with the final ABCB RIS For Decision "Assessment of options for residential smoke alarm provisions in the National Construction Code" October 2012

Outcomes of the Victorian University report include:

- the volume of the smoke alarm signal
- the proximity of the alarm to the occupant at time of activation,
- activity of the event at the time of alarm activation
- the ability for the occupant to perceive, and be aroused by, the alarm signal including impairment by drugs, alcohol or disability

*NFIA would be pleased to provide these documents if required.*

d) *what smoke alarms are in use in owner occupied rented dwellings and the installation setups*

Requirements for smoke alarms vary across all states and territories in Australia. The current legislative framework permits the use of mind the photoelectric or ionisation type alarms. The National Construction Code, from 1 May 2014, has required smoke alarms in new residential buildings where required to be interconnected. This requirement is not retrospective and each taking territory deals with this issue differently.

e) *how the provision of the straining building code relating to smoke alarm type, a installation and use can be improved*

The regulatory framework supporting the installation of smoke alarms could be strengthened to ensure there are consistent and effective requirements Australia wide. The introduction of common maintenance and testing requirements would also improve the effectiveness of this life safety system.

Product conformance is also an issue but how this can be addressed through the product conformance review given the limitations of requiring other than independent third party certification is extremely difficult without the setting up of a specific scheme similar to that of WELS. The committee May consider the option of requiring a specific fire product register as a part of providing surety for life safety in Australia. The scheme could be managed through the Australian Building Codes Board.

f) *whether there are any other legislative or regulatory measures which would minimise such injuries and deaths*

Smoke alarms are a critical early warning device for occupants to alert them to a fire hazard.

Australia does have available to it a home fire sprinkler system standard developed through the Standards Australia processes. The standard has not been mandated throughout Australia on the basis that many parties see it solely as an additional cost onto housing affordability. The standard has been worked on to reduce the cost of installation while maintaining a high level of protection on activation, and requiring this system to be installed in all new dwellings would work to reduce injuries and death in residential/domestic environments as a result of fire.

*g) any related matter*

NFIA makes the comment that with an ageing population it is these persons who may benefit most from increased service provisions if additional requirements for fire safety

However care would need to be taken to ensure no financial burden is placed on this sector of the community who do not have the capacity to meet unexpected costs.

There are also emerging technologies coming forward in this area and the system should be flexible enough to ensure early adoption of proving new technologies.

The current national regulatory framework is cumbersome and not all states and territories wait for the outcome of those processes, which leads to differing regulatory frameworks being imposed on importers, manufacturers and installers making consistency difficult in an environment where life safety should be the leading factor of consideration.

There are also government agencies and departments that call for change regardless of economic implications that the charter for the Australian Building Codes Board does not allow it to accept or adopt.

Maintenance of fire safety systems should become a requirement of the NCC with landlords and owners required to provide maintenance certificates on an annual basis to either their local building regulator or fire authority.

The NFIA would be pleased to speak to the committee if the committee would find this of assistance.

Should you wish to discuss any of the issues in this Submission, or any other matter, please contact me on

Yours sincerely

Carmel M Coate  
EXECUTIVE DIRECTOR