National Fire Industry Association
Australia
Contractors at the Frontline of Fire Protection

TFS False Alarm Reduction Consultation Paper

Submission

22-28 Phoenix Street, Brunswick VIC 3056
5/134 Racecourse Road, Ascot, QLD 4007
1000 Old Windsor Road, Glenwood, NSW 2768
213 Greenhill Road, Eastwood SA 5063

1800 00 NFIA (6342)
info@nfia.com.au
www.nfia.com.au

Table of Contents

False Alarm Reduction Project Consultation Paper: Feedback Form

Instructions: Please provide answers to the questions that have been asked as they relate to the identified categories in which we seek comment. There are no word limits to your responses.

Consultation is open from Friday September 1 to Friday November 3, 2023.

Collection of Information

Before answering any of the questions, or providing any of your details, please ensure you have read and understood the below statements.

All submissions and comments will be published. All personal details will remain in confidence and not used beyond the scope of this consultation. Your comments and feedback will only be used to help inform the best way forward for the development of the False Alarm Reduction Strategy. The Tasmania Fire Service will handle your personal information in line with the *Personal Information Protection Act 2004* (View - Tasmanian Legislation Online).

For further information relating to how the feedback from this consultation will be used, refer to the relevant section within the "False Alarm Reduction Project - Consultation Paper".

It is not a requirement of this survey to declare any of your personal details.

1. By making a submission to this consultation you agree to the collection of information you provide in your submission and the use of the information; and non-disclosure of personal information as outlined above. (Required).

   ☒ Agree ☐ Do not agree

2. On who's behalf are you making this submission? (Please select one item only)

   ☐ 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 or employee.

3. Are you a DPFEM internal employee, external employee, retained, or volunteer firefighter?

☐ I am a DPFEM internal employee.

☒ I am an external employee.

☐ I am a retained firefighter.

☐ I am a volunteer firefighter.

Introduction

The National Fire Industry Association thanks the Tasmanian Fire Service for the opportunity to comment on this important topic. The NFIA sees this issue as an opportunity for the State to advance towards implementing the recommendations published in the 2018 Building Confidence Report, developed by Peter Shergold and Bronwyn Weir. Greater regulation for the Fire Protection Industry in Tasmania is crucial to quality assurance; the safety of our built environment and all those that live, work and play in it. As a natural result there will be a reduction in false alarms and a safer environment for all.

The Australian Fire Protection Industry

Fire protection in Australia is typically achieved via three means:

- Active fire protection (fire sprinklers, fire hydrants and fire alarm systems);
- Passive fire protection (fire rated walls, floors and ceilings and fire sealing); and
- Education.

The Fire Protection Industry contributes over $2.5 billion to the Australian economy every year. Over 2000 businesses pay nearly $700 million in wages each year and industry revenue is projected to increase at an annualised rate of 1.5% over the five years through 2025-26, to reach $2.7 billion.

The IBISWorld Industry Report OD5424 Fire Protection Services in Australia (November 2020), claims that despite the presence of vertically integrated multinational giants, the industry has a low level of market share concentration. The two major companies have a combined market share of only 10% and are both part of large multinational companies operating globally across several related industries. Twenty years ago, the two major companies are estimated to have had 80% of the market.

There are numerous regional and local players that construct, install and service fire protection systems to small, medium, and major buildings across the full scope of class 2 to 9 buildings as well as higher risk facilities such as fuel depots, harbours, and similar developments. Over half the industry enterprises employ between one and 19 people. As the minor players have increased their share of the total market, the industry has become more diverse, while also growing substantially.

Where twenty years ago, the two major companies offered a form of institutionalised but limited "industry" training to their people, it could be argued that the industry was less in need of regulation. However, as the industry has grown substantially and its make-up evolved it is now predominately made up of many more, smaller independent contracting companies. That market growth and diversification has provided customers with better contractor choices, better outcomes, and better pricing but, at the same time, raised the need for more over-arching regulation.

The National Fire Industry Association (NFIA)

The National Fire Industry Association, Australia (NFIA) is an Australia-wide community of commercial fire protection contractors, their people, suppliers, and industry stakeholders representing a wide and varied membership from the smallest sub-contractor through to large Australia-wide construction and service businesses. Our Members work at the frontline of fire protection with an estimated 80 per cent of the fire protection work undertaken in Australia completed by Members of NFIA.

NFIA utilises the resources of other Australian and International industry organisations and associations.

NFIA is committed to the delivery of quality fire protection practitioners across all aspects of fire protection safety. To this end, NFIA has sponsored and supported the growth of the world leading fire industry Registered Training Organisation (RTO), Fire Industry Training (FiT), which now delivers fire industry required training for all of Australia at its campuses in Brisbane, Melbourne, and Sydney.

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

Submission

1. Policy and Procedures

Do you have any suggestions or recommendations on particular areas that TFS should target through the development of policy and guidelines that will support the decision-making process to effectively reduce false alarms?

The NFIA recommends that the best way to reduce false alarms is to increase licensing for the Fire Protection Industry in Tasmania. With greater regulation, increased compliance with the Australian Standards will inherently follow. The two main reasons behind ongoing false alarm issues in Tasmania are a lack of skilled labour and dated, obsolete systems, which both can be rectified by greater fire protection licensing.

As you will be aware, the Building Confidence Report (BCR) was commissioned by the Building Ministers Forum (BMF) in 2017 and published in 2018. The BCR includes 24 recommendations to improve the effectiveness of compliance and enforcement systems for the building and construction industry across Australia. On 18 July 2019 the BMF "agreed to a national approach to the implementation of the *Building Confidence* Report*"* and all jurisdictions supported "a national framework to address the issues identified in the Shergold Weir *Building Confidence* Report". Whilst this national approach received commitment from all jurisdictions, there has been inadequate progress so far in the adoption and implementation of the 24 recommendations. The NFIA supports all recommendations from the BCR and their adoption and implementation nationally, however, for the purpose of this Consultation Paper, we refer to those recommendations that speak directly to improving false alarms.

Recommendation 1 of the BCR identifies that whilst fire safety systems are a critical component of commercial buildings and feature heavily in the National Construction Code (NCC), most States and Territories do not have a requirement to register the practitioners who have expertise in fire safety system design, installation or maintenance. Furthermore, most complex fire safety systems in commercial buildings require maintenance and testing and, not dissimilar to design and installation, many States and Territories do not require those undertaking maintenance work to be registered. Given that most of the alarm and detection system work is currently undertaken by electricians, which is not covered in their apprenticeship and often do not receive adequate on the job training, a lot of this work has not and is not being performed correctly.

Recommendation 2 outlines the different requirements across jurisdictions for registration, as well as the limited availability for nationally consistent training packages. Without a nationally consistent approach, Automatic Mutual Recognition of registered practitioners operating across borders will be complex and as it currently stands, the process of being deemed a permit holder by the Tasmanian Fire Service can be onerous, which is not assisting with the skills shortage.

Recommendation 19 addresses inspection and certification of fire safety system installation. Developing from Recommendation 1, it recommends mandatory implementation of certification of the testing and commissioning of fire safety systems and certification should not be performed by the system installer. There must be government registration and a licensing framework for certification, as urgently as for design, installation and maintenance. The NFIA suggests that the current Tasmanian system of permit holders submitting a commissioning document to the TFS on their own works, is problematic and the implementation of a third-party certification system is recommended.

We are seeing many existing alarm systems being twenty to forty years old and have never been upgraded. Detectors are unlikely to last more than ten years and anything beyond that, it is recommended that they, as well as the fire panel, are upgraded. Improved fire protection licensing will see an uplifting of the standards of practitioners on the ground who in turn will drive building owners to upgrade systems rather than the current culture of contractors being told to patch up problems, rather than properly maintaining to the latest systems.

Further, the upgrade of these obsolete systems will create the opportunity for Fire Contractors to install/upgrade detections to one that best suits the environment, as well as programming alarm dependency, so that they don't go off instantly when not required. An example of this is when we see repeat false alarms caused by people vaping inside of buildings, now a common occurrence, however, dated systems have not been programmed to handle this kind of situation.

2. Training of Frontline Staff

What advice and support do you require from frontline staff to take action to reduce the occurrence of repeat false alarms?

The NFIA suggests that the TFS could support their frontline staff with some additional technical training, which will in turn assist Fire Contractors in the field.

On a conventional system, when there is a false alarm and the Brigade attends, frontline staff need to isolate the alarm only, to allow Fire Technicians to attend the site and diagnose the issue. Currently, there are lots of cases where frontline staff are attending sites and both isolating the false alarm and resetting the system. This results in the attending Fire Technician being unable to easily diagnose which alarm was faulty, if at all and will continue in that alarm signalling falsely until identified and fixed.

This is a simple example of where frontline staff are not sufficiently trained in the fundamentals of fire detection systems. Some feedback indicates that frontline staff are concerned that isolating the alarm only will leave the building unprotected, which is not the case.

Further training from trained Technicians will allow the TFS and Fire Contractors to work more harmoniously in the field, as well as reducing repeat false alarms. The NFIA considers that if

at least one frontline staff member per call out has the basic knowledge of fire panels required, this will greatly improve the issue.

The NFIA would be more than happy to provide additional assistance and information around this to assist the Tasmanian Fire Service.

3. Education

What type of resources would you find useful to assist in reducing the incidence of false alarms? And, what type of information do you require?

The NFIA submits that this comes down to the design of each system, which varies from building to building. Whilst policies and procedures for each particular site may assist in some circumstances, prevention of false alarms is key. As highlighted in Questions 1 and 2, system design, age and usability are the key factors in the triggering of false alarms. Greater fire protection licensing will put the onus on the building owner to ensure compliance.

4. The Setting of Fees and Charges

What considerations do you believe should be incorporated into a methodology for the setting of fees and charges relating to premises with monitored alarms?

The NFIA does not wish to submit on this matter, other than the settings of fees and charges should be fair and reasonable. The NFIA suggests that looking at other state models might assist in determining what to consider, for example the Queensland Fire and Emergency Services model which operates suitably.

5. Business Systems and Practices

How might TFS be able to provide an improved service to premises owners in the payment of fees and charges related to alarm premises?

Have you any other ideas on how TFS may be able to provide a more efficient and effective service in relation to alarmed premises?

Other than what has already been outlined above, the NFIA has nothing further to submit on this matter.

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