



Tasmania Fire Service

Fire Protection Industry

Public Consultation Paper

December 2025



Tasmania Fire Service



Tasmanian
Government

Introduction

Building Fire Services Review

In 2023, Tasmania Fire Service (TFS) engaged external consultancy KPMG to conduct a comprehensive review of the building fire safety services delivered by TFS. This review was prompted by a combination of external drivers and internal challenges, highlighting the need to identify opportunities to enhance the delivery of building fire safety services.

One of the key recommendations from the report of the review was for TFS to:

“Investigate potential alternative options and processes for the regulation of fire protection professionals.”

In response, TFS is seeking input and ideas to strengthen the regulation of the fire protection industry. Specifically, feedback is being sought across six key areas:

- Occupational licensing
- Application processes
- Auditing, compliance and support
- Industry engagement
- Communication and transparency in decision-making
- Other relevant information or suggestions.

This initiative aims to ensure that regulatory practices are robust, transparent, and aligned with industry needs and expectations.

Licensing System

Licensing within the Tasmanian fire protection system is governed by a dual-layered regulatory framework, designed to ensure both technical competency and professional accountability. This framework comprises:

- Tasmania Fire Service (TFS) Permits – regulating who may install, service, and repair fire protection systems and equipment under the *General Fire Regulations 2021*.
- Occupational Licenses – issued by Consumer, Building and Occupational Services (CBOS) under the *Occupational Licensing Act 2005*, ensuring practitioners meet broader building industry standards.

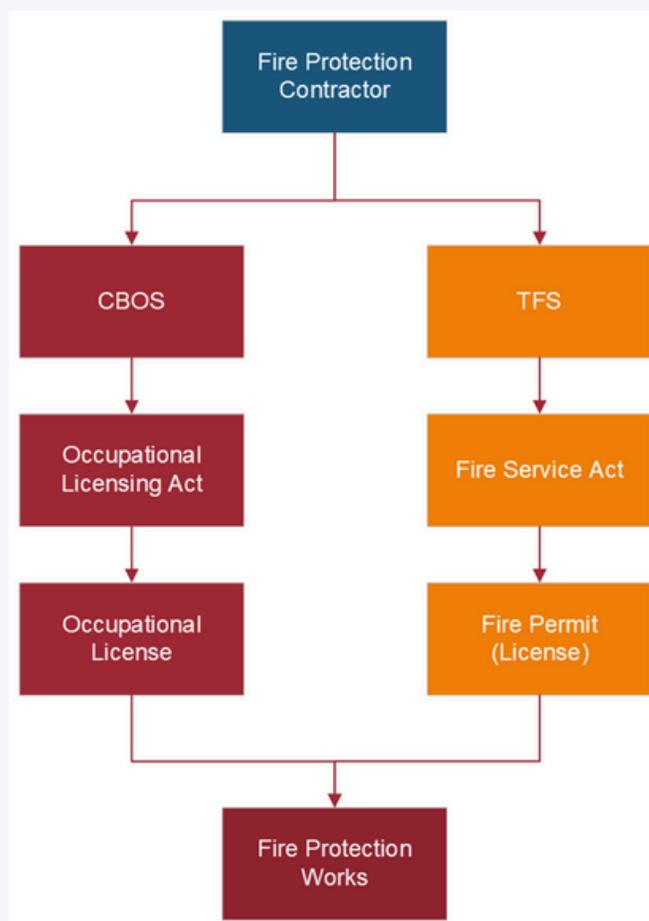


Figure 1: Fire protection system licencing framework

TFS Permit System

Under Part 2 of the General Fire Regulations, individuals intending to install, repair, or routinely service fire protection equipment must hold a valid permit (licence) issued by the Chief Officer of TFS. Permits are issued for two main categories:

1. Fire Protection Systems, which include:
 - Automatic fire detection and alarm systems
 - Fire sprinkler systems
 - Smoke detection and alarm systems
 - Fire-extinguishing systems
 - Fire hydrant systems
 - Mechanical smoke management systems
 - Emergency sound and intercom systems
2. Portable Fire Protection Equipment, such as:
 - Fire extinguishers
 - Fire hose reels
 - Fire blankets

Permit holders must comply with the TFS Code of Practice, and the application process requires evidence of qualifications, experience, and a commitment to regulatory standards. Permits are not transferable or renewable and must be reapplied for prior to expiry.

The TFS permit (licence) ensures compliance with fire safety standards and operational protocols.



CBOS Occupational Licencing System

In addition to the TFS permit, fire protection contractors may also need an occupational license issued by Consumer, Building and Occupational Services (CBOS), a division of the Department of Justice.

Governed by the *Occupational Licensing Act 2005* and the *Occupational Licensing (Building Services Work) Determination*, this license is required for those performing building services work, including fire protection services.

The CBOS occupational license ensures the contractor meets building industry standards, including qualifications, insurance, and professional conduct.

Regulatory Compliance

Regulatory compliance with fire protection standards in Tasmania is maintained through a structured program of auditing and inspection conducted by TFS.

TFS monitors compliance by:

- Conducting routine and targeted audits of permit holders and fire protection work to ensure adherence to the TFS Code of Practice and relevant Australian Standards.
- Inspecting installations and maintenance activities to verify that systems are designed, installed, and serviced in accordance with approved methods and regulatory requirements.
- Reviewing documentation and service records, which permit holders and building occupiers are required to maintain.
- Investigating complaints or non-compliance and taking enforcement action where necessary, including suspension or cancellation of permits (licences).

This proactive compliance approach helps uphold safety standards, ensures accountability across the industry, and supports public confidence in fire protection services.

The issues on which comment is sought

1. Occupational Licensing

The Department of Justice, through Consumer, Building and Occupational Services (CBOS), administers occupational licensing under the *Occupational Licensing Act 2005*, covering a broad range of regulated professions across Tasmania. This licensing framework is widely recognised as a benchmark for the regulation of trade professionals within the state.

Given the comprehensive nature of the CBOS licensing system, the current fire permitting process managed by TFS may be viewed as a duplication in the regulation of fire protection professionals. This overlap can lead to increased administrative burden, higher compliance costs, and confusion within the industry.

As such, it has been suggested that CBOS may be better positioned to assume regulatory responsibility for licencing of the fire protection industry. Consolidating licensing under a single authority could deliver a more streamlined, consistent, and cost-effective approach to regulation, while maintaining high standards of safety and professional accountability.

Questions

Do you have any suggestions for how licencing of the fire protection industry could be more efficiently and effectively regulated?

We're particularly interested in ideas that could enhance consistency, reduce duplication, streamline processes, and lower costs to practitioners - while maintaining high safety and professional standards.

Do you support a model where a single regulatory body oversees occupational licensing for the fire protection industry in Tasmania?

Consolidating administration and licencing under one authority could help streamline processes, reduce duplication, and lower compliance costs.



2. Application Processes

Initial feedback from stakeholders has highlighted the need for more contemporary and user-friendly permit application processes for the fire protection industry.

Other government departments offering similar occupational licensing services have adopted secure online portals for application submissions, which streamline workflows and improve accessibility. These systems are typically supported by:

- Clear, web-based guidance materials.
- Easy-to-navigate application interfaces.
- Direct access to customer support officers for assistance.

Modernising the application process in line with these practices could significantly enhance user experience, improve efficiency, and reduce administrative burden for both applicants and administrators.

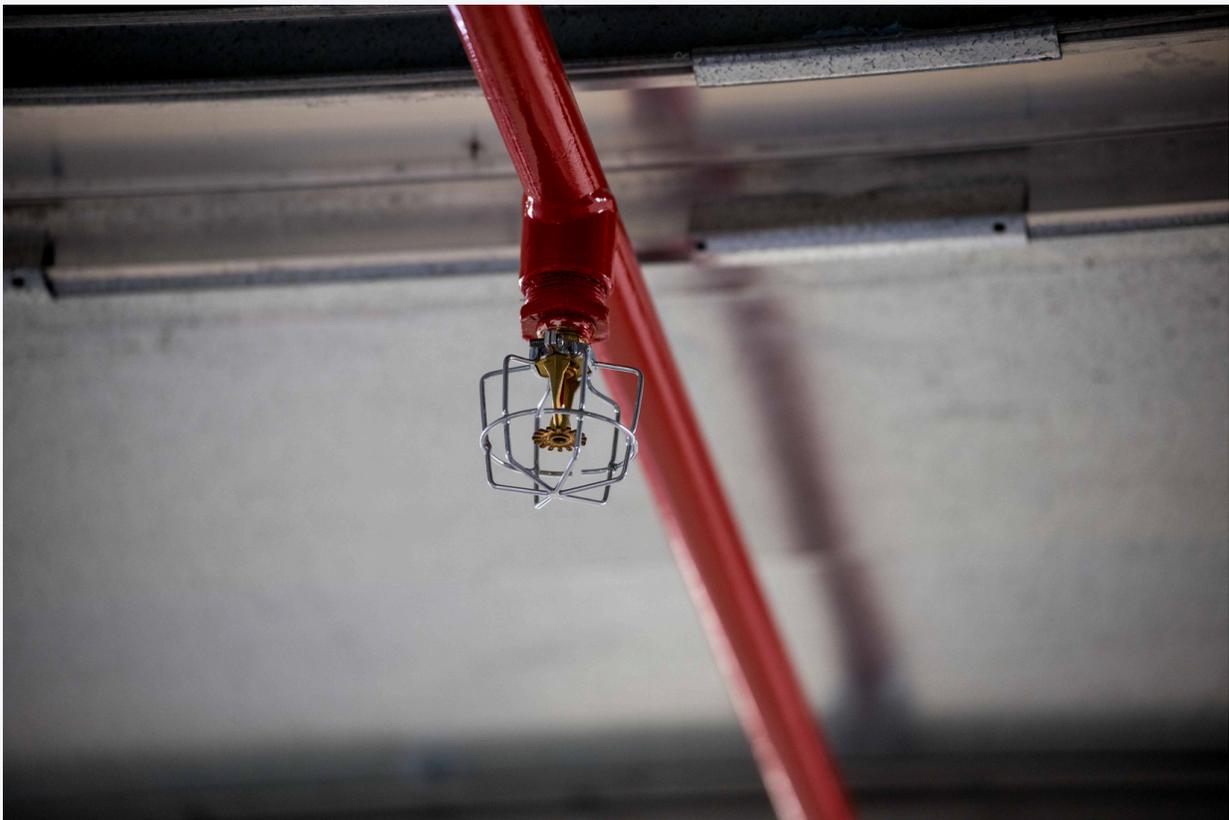
Questions

Do you have any suggestions for the most effective and efficient way to apply for fire protection industry permits (licences)?

We're particularly interested in ideas that could help streamline the application process, improve accessibility, reduce administrative burden, and ensure clarity for applicants.

Do you support the implementation of a secure, online-based application process for fire protection permits (licences), supported by access to advice and guidance from customer support officers?

This approach could improve efficiency, enhance user experience, and ensure applicants have the support they need throughout the process.



3. Audit, Compliance and Systems

It has been identified that the fire protection industry in Tasmania requires greater support in fire safety, auditing, and compliance to ensure minimum standards are consistently met.

This includes:

- Active onsite audits conducted by TFS to verify that fire protection systems are installed, serviced, and maintained in accordance with Australian Standards and industry benchmarks.
- Verification of permit holders' work, ensuring that those authorised to operate within the fire protection industry are performing tasks that align with regulatory expectations.
- Modernisation of the *Fire Protection Industry Code of Practice*, maintaining it as the central benchmark for professional conduct, technical standards, and compliance requirements.

These measures aim to enhance accountability, improve safety outcomes, and support a more consistent and transparent regulatory environment.

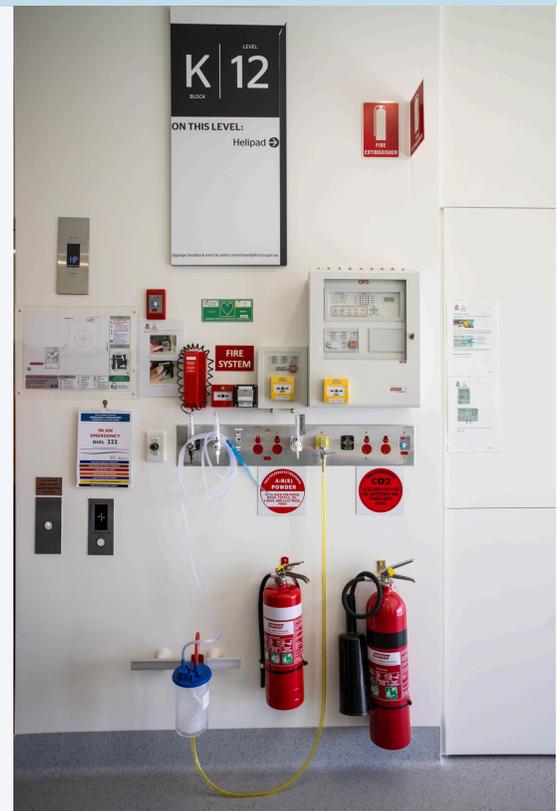
Questions

How might TFS enhance its services to ensure fire protection professionals consistently meet industry standards and operate within the Code of Practice?

We're particularly interested in ideas that could strengthen oversight, improve support for practitioners, and promote accountability—such as enhanced auditing, clearer guidance, or better access to training and resources.

Do you believe TFS needs to enhance its audit and compliance capabilities to better support regulatory oversight of the fire protection industry?

We're particularly interested in views on whether increased auditing, more frequent inspections, or improved compliance tools could help ensure industry standards are consistently met



4. Industry Engagement

Stakeholder feedback has highlighted the importance of strengthening industry engagement through:

- Targeted training and professional development.
- Clear and accessible education resources.
- Improved communication channels between regulators and practitioners.

Modernising the *Fire Protection Industry Code of Practice* and maintaining it as the central benchmark for professional standards may be key to supporting this approach and ensuring alignment with Australian Standards.

Question

How can training, education, and communication within the fire protection industry be enhanced to better support practitioners and align with evolving standards and regulations?

We're particularly interested in views on improvements to communication between regulators and industry professionals, and what types of training or professional development would be most beneficial for practitioners.

5. Communication and transparency in decision-making

There is a perceived lack of clear, consistent, and transparent policies and processes governing licensing, compliance, and auditing within Tasmania's fire protection industry.

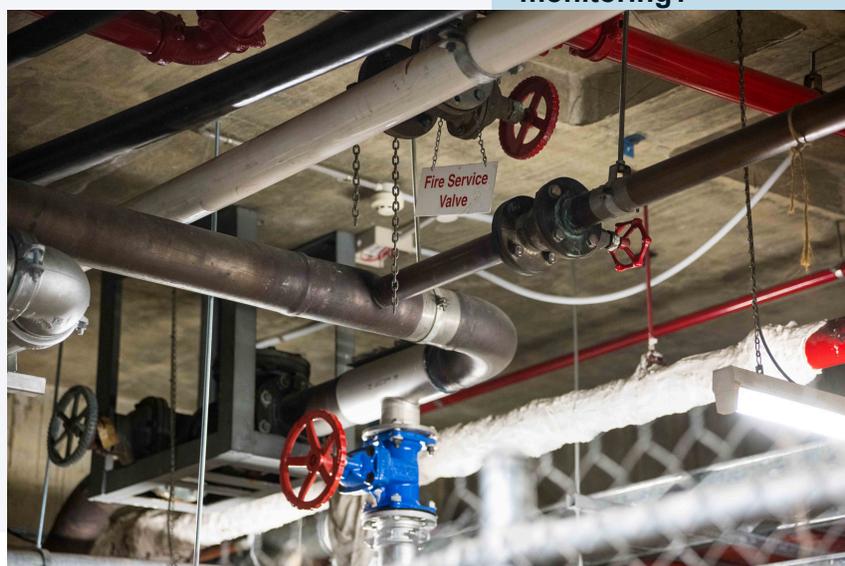
Stakeholders have raised concerns about the effectiveness and integrity of current regulatory mechanisms, particularly the role of the industry permit committee, which may give rise to potential conflicts of interest.

Questions

Do you believe the current occupational licensing and permitting system provides a clear, efficient, and effective framework for regulating fire protection professionals in Tasmania?

What changes or improvements would you recommend to strengthen transparency, accountability, and compliance?

Do you have any comments on the current policies and processes regulating the fire protection industry in Tasmania, particularly in relation to auditing practices and compliance monitoring?



6. Other Information

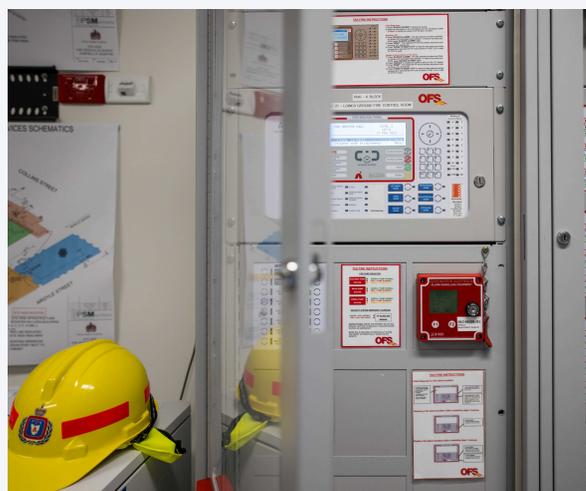
To ensure the regulatory framework effectively safeguards building occupants and the broader community, reform of Tasmania's fire protection industry may be necessary.

These reforms could encompass a range of areas, including licensing, compliance monitoring, auditing practices, and the governance structures involved in permit approvals.

Strengthening these elements may help enhance transparency, accountability, and alignment with national standards, while supporting a more consistent and efficient regulatory environment.

Question

Is there any additional feedback or information you would like to share regarding the regulation of the fire protection industry in Tasmania, including any aspects not already covered such as auditing, compliance, licensing, or governance?



Invitation for Submissions

The Tasmania Fire Service invites written submissions in response to the public consultation paper.

Feedback can be emailed to: cfsadmin@fire.tas.gov.au

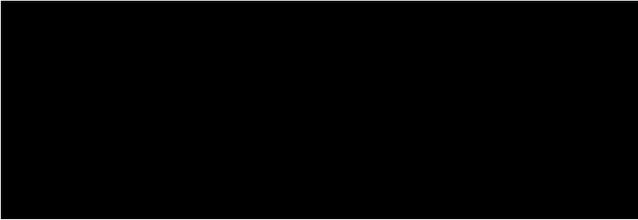
Submissions close at: 30 January 2026



Publishing Submissions

The Tasmanian Government is dedicated to upholding transparency and openness in public consultation processes. To ensure consistency, departments follow a standardised approach when it comes to publishing submissions. This commitment aligns with the community's expectations of having access to information that informs the Government's decision-making on significant policy matters. Results from the consultation will be published after consultation at <https://fire.tas.gov.au> except in cases where it is deemed not in the public interest to release the information (e.g., to protect sensitive information) or when submitters explicitly request confidentiality. Only the organisational information (government, non-government, internal to DPFEM, or external to DPFEM) of the submitter will be published, with no personal details disclosed. For further information, please read the Tasmanian Government Public Submissions Policy ([external link](#)).

For Further information please contact the Community Fire Safety Division, Tasmania Fire Service at cfsadmin@fire.tas.gov.au or on 03 6166 5606



Chief Officer
Tasmania Fire Service

Attention: 

Email: 

26 January 2026

Regulating the Fire Protection Industry – Public Consultation Paper Submission

Thank you for the opportunity to comment on the ‘Fire Protection Industry – Public Consultation Paper’ (the Document) dated 8 December 2025.

In summary, the issue identified in the Document is that there are parallel schemes for regulating the installation, repair and maintenance (referred to in this submission collectively as installation) of fire protection systems in Tasmania. The two schemes are;

1. The issue of fire protection permits (the Permit) by the Chief Officer of the TFS in accordance with Part 2 of the *General Fire Regulations 2021* as described at the website <https://www.fire.tas.gov.au/fire-protection-permits/>, and
2. The requirement for ‘Builder (and Plumber) – Fire Protection Services’ to be licensed in accordance with the *Occupational Licensing Act 2005* (the OL Act) as described in the ‘Occupational Licensing (Building Services Work) Determination (version 2.3)’ found at https://www.cbos.tas.gov.au/_data/assets/pdf_file/0004/644503/Occupational-Licensing-Building-Services-Work-Determination.pdf. This licensing is also a requirement for various functions, some of which are discussed below under the *Building Act 2016*.

The Document acknowledges (at page 4) that there is a duplication between these schemes and that ‘this overlap can lead to increased administrative burden, higher compliance costs, and confusion within the industry.’ Given that fire protection systems are a critical life safety system, the need for clarity and the avoidance of confusion is obvious.

The questions posed in the paper are addressed below.



1. Do you have any suggestions for how licencing of the fire protection industry could be more efficiently and effectively regulated?

Given that the Document has been generated by the Chief Officer and that the Permit process is administered by the Chief Officer, it seems reasonable to assume that the TFS are advocating that the Permit process should prevail to avoid the duplication though this does not appear to be expressly stated in the Document. This submission assumes this is the position of the Chief Officer and provides a reasoned counter position for consideration.

The first point to be made is that there is no gap analysis that sets out the complex interaction between the Licensing process and operation of the *Building Act 2000*. In particular, the following issues are raised.

- The Licensing process includes a requirement for the design and installation of fire protection systems. If the outcome is to remove the requirement for a License to remove the duplication, the outcome will be that fire protection businesses that design and install fire protection systems will still need a License and a Permit. As a consequence, there would arguably be no reduction for these firms in the administrative burden or compliance cost. It is dubious about whether this will remove confusion within the industry.
- Under the OL Act, there is a requirement for the building work, including the installation of fire protection systems, to be undertaken by a licensed contractor (see section 21 of the OL Act). Section 45(3) of the *Building Act 2016* also requires a builder to be licensed. To modify this process under these two statutes would be problematic.
- Section 321 of the *Building Act 2016* establishes a mechanism where a building services designer can certify the commissioning of fire detection and suppression systems. This is achieved via the issue of a form 55 and is described in the ‘Director’s Determination – Certificates by Qualified Persons for an Assessable Item’ at https://www.cbos.tas.gov.au/_data/assets/pdf_file/0017/405008/Directors-Determination-of-Certificates-by-qualified-persons-for-assessable-items-v1.2.PDF. There is immunity for some stakeholders under Part 21 Division 5 where this certificate is provided. A Permit holder from the Chief Officer may not be able to provide that certificate.

There may be other significant issues where fire protection services are not covered by the balance of the provision of the OL Act where the fragmentation of the license may disrupt enforcement, review and other administrative procedures. This is particularly relevant where the fire protection industry participant is both a designer and an installer.

2. Do you support a model where a single regulatory body oversees occupational licensing for the fire protection industry in Tasmania?

Yes – CBOS. There should be one scheme for all accredited people in the construction industry, not a separate scheme for fire protection industry.

3. Do you have any suggestions for the most effective and efficient way to apply for fire protection industry permits (licences)?



In general, the most efficient system would be a single, unified application system, however, it's unclear how / whether the existing CBOS system is ineffective.

4. Do you support the implementation of a secure, online-based application process for fire protection permits (licences), supported by access to advice and guidance from customer support officers?

Assuming the options are primarily online vs paper based, online is the preferred option. A secure system should be assumed.

5. How might TFS enhance its services to ensure fire protection professionals consistently meet industry standards and operate within the Code of Practice?

The Chief Officer should collaborate with the Administrator and the Director of Building Control to issue guidance material and / or Determinations to provide further clarity on licensing and changes to building standards (if this is considered necessary).

The process for the issue of guidelines and Determinations impacting on building work is provided at Sections 19 and 20 of the Building Act 2016.

6. Do you believe TFS needs to enhance its audit and compliance capabilities to better support regulatory oversight of the fire protection industry?

No – audit and compliance functions should sit with the government agency responsible for licensing practitioners (CBOS ideally). It has not been demonstrated why practitioners in the fire protection industry require special consideration / compliance oversight. TFS already reviews the design prior to building approval and inspects the building work prior to occupation to ensure that operational requirements are met, consistent with the referral provisions in the building act.

It is recommended that;

1. The TFS explore the possibility of having input into the assessment of fire practitioners within the CBOS system with the license issued by the Administrator.
2. A review be undertaken on the auditing function to determine;
 - The frequency of defective work being undertaken by permit holders under the existing system.
 - An understanding what approaches have been applied to remedy auditing / enforcement requirements and why these have not been effective.
 - Are there opportunities for the TFS to collaborate with the Administrator and the Director?

7. How can training, education, and communication within the fire protection industry be enhanced to better support practitioners and align with evolving standards and regulations?

Workshops that provide clear / concise information should be made available for practitioners both in person and recorded for online viewing, with opportunities for practitioner engagement and questions. Guidance material should be developed for frequently asked questions and made publicly available.



8. Do you believe the current occupational licensing and permitting system provides a clear, efficient, and effective framework for regulating fire protection professionals in Tasmania?

CBOS should oversee both occupational licensing and permitting for all accredited people in the construction industry. See previous responses.

9. What changes or improvements would you recommend to strengthen transparency, accountability, and compliance?

No additional comment other than that a single licensing process should be adopted as this will achieve greater transparency, accountability and compliance.

10. Do you have any comments on the current policies and processes regulating the fire protection industry in Tasmania, particularly in relation to auditing practices and compliance monitoring?

No additional comment.

11. Is there any additional feedback or information you would like to share regarding the regulation of the fire protection industry in Tasmania, including any aspects not already covered such as auditing, compliance, licensing, or governance?

Several Acts may need to be amended to move away from the existing CBOS licensing process. This may create secondary (adverse) consequences leading to uncertainty, divisive processes, and fragmentation, if the approach adopted is to remove the duplication in favour of the Permit process provided by the Chief Officer. It is difficult to imagine that this will reduce costs or the regulatory burden. The opposite effect may be the result. The justification for this level of change in favour of the existing Permit process administered by the TFS does not appear warranted and the proposal is not supported.

Thank you for taking the time to consider this correspondence.

[Redacted signature block]

&

[Redacted signature block]

[Redacted signature block]

[REDACTED]
[REDACTED]
[REDACTED]
Tasmania Fire Service
GPO BOX 308
HOBART TAS 7000

RE: FPA Australia Submission to the Fire Protection Industry Public Consultation

Dear [REDACTED],

Fire Protection Association Australia (FPA Australia) is the national peak body representing the fire protection industry, with members operating across all states and territories and spanning the full fire safety system lifecycle.

FPA Australia thanks Tasmania Fire Service (TFS) for the opportunity to provide feedback as part of the public consultation on the regulation of the fire protection industry in Tasmania.

This submission has been informed by consultation with FPA Australia members operating in Tasmania, together with input from the FPA Australia Tasmanian State Committee.

In summary, our members are seeking a clearer, more transparent and more efficient regulatory model that is supported by stronger audit and compliance capability, and a more predictable pathway for demonstrating competency.

Accordingly, this submission focuses on:

- reducing duplication and improving clarity between TFS and CBOS
- strengthening independence and transparency in permitting and licensing decision-making
- modernising application processes through a secure online portal with practical support
- implementing a risk-based audit and compliance program with meaningful enforcement
- improving training, communication and CPD expectations across the sector.

FPA Australia welcomes the opportunity to contribute to this process and would be pleased to provide any further information or participate in additional discussions, should this be of assistance.

We hope this submission provides additional context from industry participants working in Tasmania, and supports Government's consideration of a clearer, more consistent and more risk-proportionate regulatory approach that strengthens public safety outcomes.

We welcome the opportunity to continue to work constructively with TFS and relevant agencies as the consultation progresses and as any future policy settings are developed and implemented.

If you have any questions or would like to discuss any aspect of this submission further, please contact

[REDACTED] a via [REDACTED].

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

1. Occupational Licensing

Question 1.1

Do you have any suggestions for how licencing of the fire protection industry could be more efficiently and effectively regulated?

We're particularly interested in ideas that could enhance consistency, reduce duplication, streamline processes, and lower costs to practitioners - while maintaining high safety and professional standards.

FPA Australia recommends an independent accreditation framework, aligned with TFS permit requirements and CBOS licensing requirements, to support improved regulation of the fire protection industry in Tasmania through stronger transparency, reduced duplication and clearer competency assurance.

The majority of member feedback received signalled that the current arrangements require significant improvement and reinforced the importance of a clearer, more consistent framework supported by robust compliance capability.

Key themes raised through industry consultation include:

- improving independence and transparency in decision-making (including concerns about industry competitors participating in permit decision panels)
- clarifying and aligning roles between Tasmania Fire Service (TFS) and Consumer, Building and Occupational Services (CBOS) to reduce duplication
- establishing clearer competency pathways across wet, dry, passive and related disciplines.

To address these issues, FPA Australia recommends the establishment of an independent accreditation, permit and licensing support framework for the fire protection industry in Tasmania.

Such a framework would support TFS by streamlining the existing permitting process and reducing the administrative burden associated with application assessments.

It would also assist CBOS by providing clearer, more accurate information regarding licensing requirements and competency expectations for businesses and their service providers, particularly where current expectations are perceived as unclear or inconsistently applied.

An independent framework would provide the assurance that only appropriately qualified and competent practitioners are authorised to undertake fire protection work across the state, supported by suitable insurance arrangements and professional responsibility obligations.

This would strengthen confidence for regulators, building practitioners and duty holders, and provide a more consistent basis for audit and compliance activity.

This could be achieved through implementation of a Tasmania-tailored Fire Protection Accreditation Scheme (FPAS) model, administered by FPA Australia, with agreed scopes of work and evidence requirements developed collaboratively with TFS and CBOS.

Under this model, contractors and companies would submit evidence of qualifications, competencies, experience, insurance and governance requirements for independent assessment against criteria.

As the accrediting body, FPA Australia would verify compliance and maintain records of accredited individuals and companies against criteria developed with TFS and CBOS.

The existing FPAS framework is well suited to support TFS permit requirements.

In parallel, a complementary accreditation stream could be developed to align with CBOS licensing requirements, with a specific focus on company-level compliance and assurance rather than duplicating individual permitting decisions.

By establishing an accreditation framework that effectively bridges the roles of both regulatory bodies, this model would reduce duplication, streamline administrative and application processes, and provide a clearer and more navigable system for industry participants.

Upon successful accreditation, each practitioner or company would be issued with an FPAS Digital ID detailing approved scope of work, qualifications, insurance coverage and current status.

This would provide TFS and CBOS with an efficient mechanism for verifying credentials and would also offer building owners and occupiers a reliable way to confirm that fire protection systems are being installed, inspected and maintained by appropriately accredited, licensed and insured practitioners.

This model supports a more efficient, transparent and consistent permitting and licensing environment for all stakeholders, while strengthening competence assurance and supporting more targeted, risk-based compliance activity.

Having operated successfully for more than a decade across multiple Australian jurisdictions, the FPAS model provides a mature and proven framework that can support a co-regulatory approach overseen by government, without creating additional cost or administrative burden for regulators.

Question 1.2

Do you support a model where a single regulatory body oversees occupational licensing for the fire protection industry in Tasmania?

Consolidating administration and licencing under one authority could help streamline processes, reduce duplication, and lower compliance costs.

FPA Australia supports streamlining oversight functions, provided accountabilities are clear, duplication is reduced, and assurance outcomes are strengthened.

Industry input broadly supports streamlining in principle, while also emphasising the need for clarity on how responsibilities would be allocated and administered in practice.

Any reform should therefore reduce administrative burden for industry and regulators, while improving consistency, transparency and compliance capability.

There is an important role for both TFS and CBOS within the fire protection industry, with distinct but complementary functions.

In broad terms, one regulator appropriately focuses on contractors and service providers, while the other is responsible for consumer and purchaser protection.

This separation can be beneficial where it is clearly defined and consistently applied, ensuring individuals are held accountable for competency, while businesses remain responsible for governance, supervision and compliance.

Done well, this distinction supports stronger compliance outcomes and enhances safety for building occupants and owners.

FPA Australia and its members would support the establishment of a single regulatory body where consolidation demonstrably delivers improved clarity, reduced duplication and more streamlined processes, provided the body has the capacity, capability and resourcing to administer regulatory requirements effectively and provide appropriate support to both licence holders and permit holders.

However, we also note that consolidation can carry risks if not designed carefully, including longer application processing times, increased demand on customer service functions, and a more complex framework for industry and duty holders to navigate.

Whether achieved through a single regulator or a coordinated two-agency model, the practical goal should be a 'single front door' for industry, supported by clearly defined responsibilities, consistent criteria and aligned processes.

If consolidation is not pursued, FPA Australia strongly supports a more clearly defined and structured regulatory framework that delineates the respective roles and responsibilities of TFS and CBOS, including clear articulation of the obligations, requirements and accountabilities applying to both licensing and permit holders.

To support this, we recommend TFS and CBOS formalise an agreed operating model (including shared definitions of scope of work and competency, and consistent decision criteria) and, where feasible, implement a coordinated end-to-end process that is supported by shared data, consistent terminology, and aligned renewal cycles.

2. Application Processes

Question 2.1

Do you have any suggestions for the most effective and efficient way to apply for fire protection industry permits (licences)?

We're particularly interested in ideas that could help streamline the application process, improve accessibility, reduce administrative burden, and ensure clarity for applicants.

A standardised, digital-first application process, supported by clear templates, defined criteria and service standards, would be the most effective way to streamline permitting while improving consistency and accessibility.

The current process appears workable; however, industry input indicates that stronger structure and clearer requirements are needed to improve consistency and reduce variability in assessment.

Mixed experiences were reported by the industry, with common requests for more defined assessment criteria, clearer documentation expectations and a more predictable decision-making pathway.

Standardising requirements would reduce back-and-forth between applicants and assessors, lower administrative burden, and lift confidence in outcomes.

FPA Australia recommends a standardised application and renewal process that includes:

- clear eligibility criteria and checklists (including scope-specific requirements)
- transparent decision points and consistent assessment criteria
- published service standards/timeframes for assessment and approvals
- a clear, documented review/appeals pathway where decisions are disputed.

A secure online portal supported by a fully digital workflow would provide the most efficient and accessible solution for applicants and regulators.

The portal should support document upload, validation of prerequisites, status tracking, automated renewal reminders, and the issuing of digital licences/permits, reducing paper-based processes and improving efficiency.

Where feasible, the portal should be developed in collaboration with CBOS (or be interoperable with CBOS systems) to reduce duplication, shorten application timeframes and improve the end-to-end user experience, particularly for applicants who currently navigate multiple touchpoints.

Finally, members also noted that earlier approaches (including the more prescriptive application practices used historically) provided clearer direction to applicants, because requirements were consolidated into a single, detailed template.

Reintroducing a comprehensive, standard permit application template (setting out required business details, nominated qualified personnel, workmanship and QA controls, supervision arrangements, maintenance capability and 24/7 service arrangements (where relevant)) would improve consistency, reduce uncertainty, and minimise rework.

To ensure accessibility, the model should also include an assisted application option (phone support and/or appointments) for applicants who need guidance navigating the digital process.

Question 2.2

Do you support the implementation of a secure, online-based application process for fire protection permits (licences), supported by access to advice and guidance from customer support officers?

This approach could improve efficiency, enhance user experience, and ensure applicants have the support they need throughout the process.

FPA Australia supports implementation of a secure, online-based application process for fire protection permits and licences, supported by accessible guidance and responsive customer support.

Industry input indicates strong support for a digital pathway due to improved clarity, reduced administration and the ability to track progress and outstanding requirements in real time.

At the same time, member feedback also highlights the importance of ensuring applicants can access practical help, particularly where applications are complex or where clarification is needed on evidence requirements, so that the system is efficient and user-friendly.

FPA Australia recommends the online portal be supported by clear guidance materials (including FAQs, examples, checklists and scope-specific evidence requirements) and access to customer support officers who can provide assistance by phone or appointment.

For applicants who prefer more direct engagement, the model should include an assisted application option (e.g., scheduled calls or in-person appointments in defined circumstances), without reverting to a fully manual process.

To strengthen confidence, consistency and accountability, the portal should also include:

- role-based access (for applicants, nominated responsible persons, assessors and administrators)
- status tracking and automated notifications (including requests for additional information and renewal reminders)
- a clear audit trail and record of key decision points
- transparent communication of required evidence for each scope of work, aligned to the competency pathway and relevant standards.

3. Audit, Compliance and Systems

Question 3.1

How might TFS enhance its services to ensure fire protection professionals consistently meet industry standards and operate within the Code of Practice?

We're particularly interested in ideas that could strengthen oversight, improve support for practitioners, and promote accountability —such as enhanced auditing, clearer guidance, or better access to training and resources.

TFS can materially lift industry performance and confidence by strengthening practical guidance, resourcing and support, and implementing a targeted, risk-based oversight and compliance program aligned to the Code of Practice.

Industry feedback consistently emphasises the need for clearer guidance materials, better communication of expectations and updates, improved access to training and resources, and a stronger audit and oversight approach.

A recurring theme is also the importance of ensuring TFS has appropriately qualified and trained personnel, with sufficient resourcing within the Building Safety Division, to deliver effective implementation, compliance and auditing functions.

FPA Australia recommends TFS publish **practical, plain-English guidance aligned to the Code of Practice**, including scope definitions, evidence expectations for each scope, common non-conformances and examples of acceptable documentation.

This should be supported by regular **industry bulletins and webinars, and a centralised online resource hub** that is kept current and easy for practitioners to navigate.

To promote ongoing competency and accountability, **Continuing Professional Development (CPD)** should be incorporated as part of the permitting, licensing and/or accreditation settings.

Linking CPD to renewal would help ensure practitioners remain up to date with standards, emerging technologies and regulatory obligations, and provide stronger assurance that work is delivered safely and consistently across Tasmania.

Oversight should then be strengthened through a **risk-based compliance program**, supported by digital records and data, to better target regulatory effort where it matters most.

This approach should prioritise higher-risk work types and building classes, repeat non-compliance, and systemic issues identified through audits or incident trends.

Where patterns of non-conformance emerge, regulatory responses should combine enforcement with targeted education to lift capability across the market.

A fully digitised system would also enable more efficient compliance management, including tracking practitioner/company credentials, undertaking targeted onsite inspections, and responding to building compliance issues with clearer evidence and faster turnaround.

Building on this, TFS should consider mechanisms that strengthen whole-of-building assurance over time, such as **Annual Compliance Statements** or yearly condition reporting for regulated buildings, supported by a digital submission platform to minimise administrative burden.

In addition to improving accountability for building owners and service providers, such reporting would provide valuable data to support targeted inspections and earlier identification of higher-risk buildings.

Finally, to lift confidence at occupancy and handover, particularly for complex systems, TFS should consider strengthening expectations around commissioning, certification and system interface testing, so that end-to-end system performance can be demonstrated more reliably and consistently.

Question 3.2

Do you believe TFS needs to enhance its audit and compliance capabilities to better support regulatory oversight of the fire protection industry?

We're particularly interested in views on whether increased auditing, more frequent inspections, or improved compliance tools could help ensure industry standards are consistently met

TFS should enhance its audit and compliance capability as a priority to strengthen regulatory oversight, reinforce independence in assurance activities, and build public confidence and trust in the fire protection system.

Member feedback strongly supports enhanced audit and compliance capability, identifying this as a long-standing issue affecting confidence in regulatory outcomes.

There is clear support for increased auditing and inspection activity, particularly where it is risk-based, outcome-focused and undertaken by appropriately skilled and independent personnel operating within a clear regulatory framework.

FPA Australia supports strengthening audit and compliance capability through a structured, risk-based audit program, supported by adequate resourcing, consistent audit tools and clear escalation pathways.

Audit activity should prioritise higher-risk building types, complex systems, repeat non-compliance and areas where systemic issues are identified through complaints, incidents or data trends.

This approach would improve assurance outcomes while ensuring regulatory effort is proportionate and targeted.

Industry feedback also highlights the importance of independence and capability in compliance and auditing functions.

Ensuring that audit and compliance activities are undertaken by suitably qualified and trained personnel, operating with clear separation from commercial interests and supported by consistent methodologies, is critical to achieving credible and defensible outcomes.

This independence is essential not only for regulatory integrity, but also for maintaining confidence among building owners, practitioners and the broader community.

Implementation of the previously outlined reforms, including independent accreditation, clearer obligations for contractors and service providers, mandatory annual reporting or condition statements, CPD requirements, and a fully digitised system, would reduce administrative burden on TFS and improve visibility of practitioner activity and building compliance.

This would enable TFS to shift resources away from transactional processing and toward higher-value regulatory functions such as inspections, complaint investigation and compliance auditing.

Improved data capture and reporting would further support effective oversight by providing TFS with a clearer picture of compliance trends and emerging systemic risks, enabling earlier intervention and more informed regulatory decision-making.

Enhanced auditing will only be meaningful if it is supported by practical, proportionate and consistently applied enforcement mechanisms.

Industry feedback indicates that audit findings must translate into clear corrective actions and, where required, timely and predictable enforcement outcomes, supported by transparent escalation pathways and clear expectations for rectification.

4. Industry Engagement

Question 4.1

How can training, education, and communication within the fire protection industry be enhanced to better support practitioners and align with evolving standards and regulations?

We're particularly interested in views on improvements to communication between regulators and industry professionals, and what types of training or professional development would be most beneficial for practitioners.

Training, education and communication can be enhanced through a coordinated, structured framework that keeps practitioners competent, informed and aligned with evolving standards and regulatory expectations.

Member feedback emphasises the need for clearer updates on changing standards, more accessible learning pathways, and more consistent communication about regulatory expectations.

Improving how requirements are communicated, and ensuring practitioners can readily access training and guidance, will lift capability and reduce avoidable non-compliance driven by uncertainty or outdated information.

Structured Professional Development and CPD Requirements

FPA Australia recommends development of an agreed competency framework by scope of work (wet, dry, special hazards, passive and related disciplines), with clear minimum qualifications and experience expectations and recognition of prior learning where appropriate.

Building on this, CPD should be linked to renewal or continuing authorisation, with requirements proportionate to role and risk profile.

This supports ongoing competency, strengthens accountability, and helps ensure practitioners remain current on standards, emerging technologies and Code of Practice obligations.

Enhanced Communication Channels Between Regulators and Industry

TFS and CBOS should strengthen clear, timely and consistent communication through regular bulletins, webinars and technical briefings, and direct notifications when requirements change.

A central online hub, ideally integrated with the permitting portal, should host current guidance, frequently asked questions, templates and clarifications on evidence requirements.

A responsive helpdesk function and periodic engagement sessions with industry associations would provide a practical feedback loop and improve shared understanding of expectations.

Tailored and Accessible Training Programs

Training should be flexible, modular and accessible across Tasmania using blended delivery (online and in person) to support both metropolitan and regional practitioners.

Priority offerings could include accredited short courses on emerging systems and technologies, refresher modules for higher-risk work types, and scenario-based learning to support consistent installation, inspection and audit practices.

Training should also include regulatory education, such as Code of Practice updates, legislative changes and common non-conformances, so expectations are understood and applied consistently in practice.

5. Communication and transparency in decision making

Question 5.1

Do you believe the current occupational licensing and permitting system provides a clear, efficient, and effective framework for regulating fire protection professionals in Tasmania?

The current occupational licensing and permitting system does not consistently provide a clear, efficient or effective framework, and reform should prioritise clearer roles, more transparent decision-making and reduced duplication.

Industry input highlights that the current arrangements can be difficult to navigate, with overlap between agencies, inconsistent clarity around requirements, and limited transparency in some decision-making processes.

Concerns were also raised about the current permit committee model and the extent to which it provides predictable, published pathways for applicants to demonstrate compliance.

FPA Australia considers that a clearer delineation of responsibilities between TFS and CBOS, combined with an independent, criteria-based accreditation approach and modernised application systems, would materially improve clarity and efficiency while strengthening safety outcomes.

A future model should include consistent terminology, clearly defined scopes of work, and published evidence requirements so applicants understand what is required and decisions are made against transparent criteria.

We also note industry concerns about the potential for duplicate or overlapping fees across regulatory touchpoints.

Any future model should be designed to minimise unnecessary duplication and ensure fees are transparent, proportionate to regulatory effort, and clearly linked to the services provided.

Question 5.2

What changes or improvements would you recommend to strengthen transparency, accountability, and compliance?

Transparency, accountability and compliance would be strengthened by replacing conflict-prone decision models with independent, criteria-based pathways, clearer role definition between regulators, and a more targeted compliance and audit approach supported by modern systems.

Industry input highlights the need to improve integrity and transparency in permitting decisions.

In particular, concerns were raised about the current permit committee model where competitors may be involved in assessing applications, and where decision rationale is not consistently visible to applicants.

A future model should remove real or perceived conflicts of interest by shifting to an independent, evidence-based assessment process, supported by pre-defined prerequisites and documented decision criteria.

FPA Australia recommends establishing a more structured independent accreditation and licensing framework, with agreed scopes of work and competency evidence requirements.

This should include clear qualification expectations for wet and dry fire protection work and an appropriate baseline qualification for general roles, with scope-specific competency requirements set out in published guidance.

Reassessment at defined intervals, such as every two years, should be considered to ensure practitioners and companies remain current against evolving standards and expectations.

Greater alignment between TFS and CBOS, with clearly defined roles and responsibilities for regulators, practitioners, companies and building owners, would improve clarity and accountability.

This should be supported by consistent terminology, shared definitions of scope, and coordinated processes so requirements are applied consistently and duplication is reduced.

A centralised licensing and permitting system, supported jointly by both regulators and delivered through a secure digital platform, would materially improve transparency and accessibility.

It would enable clearer communication of requirements, timely updates, visibility of application status, and a reliable way to identify gaps in compliance or competency.

It would also support stronger compliance oversight through better data capture, enabling more targeted auditing and risk-based inspections.

Finally, participants emphasised the value of clearer guidance and stronger engagement.

Regular industry briefings, practical guidance materials, and structured engagement with industry and associations would help lift capability, reduce avoidable non-compliance, and support consistent application of the Code of Practice.

Question 5.3

Do you have any comments on the current policies and processes regulating the fire protection industry in Tasmania, particularly in relation to auditing practices and compliance monitoring?

Current policies and processes limit the effectiveness of auditing and compliance monitoring, and would benefit from stronger baseline data, clearer enforcement pathways and more independent, risk-based oversight mechanisms.

Industry input indicates that, while compliance auditing is undertaken to the best of TFS's ability, the current framework does not provide a complete or accurate picture of building compliance or the competency of fire protection providers across the state.

In particular, there is no consistent mechanism to prioritise inspections or assess risk systematically, which constrains the effectiveness of audit and compliance activity.

Stronger baseline data at key regulatory points, especially at commissioning and occupancy, would materially improve oversight.

Clearer and more consistent requirements for certification, commissioning and system interface testing would improve confidence that fire protection systems are compliant and performing as intended before buildings are occupied.

More accurate baseline information would also support more targeted follow-up auditing over the life of the building.

Participants also reiterated concerns regarding the current permit committee model, particularly in relation to transparency and independence.

Removing this model in favour of independent, criteria-based assessment pathways would strengthen regulatory integrity and support more consistent and defensible compliance outcomes.

More frequent auditing is broadly supported; however, industry feedback emphasises that increased audit activity will only be meaningful if it is supported by practical enforcement mechanisms.

Under the current legislative settings, there are perceived limitations on the ability to apply proportionate penalties and corrective actions, which reduces the deterrent effect of audits and undermines confidence in compliance monitoring.

Additionally, we believe that implementing a more integrated framework supported by accurate, real-time data on both building compliance and practitioner competency would enable TFS to better allocate resources, focus on higher-risk buildings, and improve the overall efficiency and effectiveness of auditing and regulatory oversight.

6. Other information

Question 5.2

Is there any additional feedback or information you would like to share regarding the regulation of the fire protection industry in Tasmania, including any aspects not already covered such as auditing, compliance, licensing, or governance?

FPA Australia supports reforms that strengthen integrity, independence and resourcing, and ensure Tasmania's regulatory framework reflects the full scope of modern fire protection disciplines while avoiding unnecessary duplication.

Industry input highlights that TFS Building Safety resources are stretched, which can limit the consistency and reach of compliance activity.

One option to improve coverage, without diminishing regulatory control, would be to enable appropriately qualified and experienced practitioners to undertake defined compliance functions under a structured, government overseen authorisation model.

This could include clear eligibility criteria, training, conflict management requirements, standardised tools and reporting templates, and strong audit and oversight by TFS to ensure consistency and independence.

Feedback also raises concerns about the cumulative cost of regulatory participation, particularly where both TFS and CBOS levy fees for related regulatory functions.

Any future model should minimise duplication, ensure fees are transparent and proportionate to regulatory effort, and provide clarity to industry about what each fee covers and the service outcomes it supports.

Another theme that emerged is around the importance of visible integrity and independence in permitting, governance and auditing.

Industry confidence and voluntary reporting of substandard or non-compliant work is strengthened when regulatory processes are clearly independent, consistently applied, and supported by suitably qualified personnel.

Reform should therefore prioritise independence, clear decision criteria, and access to knowledgeable regulatory support, including practical guidance and responsive technical advice.

FPA Australia recommends that TFS and CBOS consider broadening the scope of Tasmania's licensing and permitting system to more comprehensively reflect the full spectrum of disciplines that contribute to building fire safety.

Formal inclusion of Emergency Planning, Passive Fire Protection, and Emergency and Exit Lighting would strengthen end to end assurance and improve consistency across the building lifecycle.

Any expansion should be accompanied by clear competency and accreditation expectations, verified through recognised qualifications and or appropriate assessment processes, to ensure practitioners operating in these disciplines are appropriately skilled, current and accountable.

29 January 2026

Dear Community Fire Safety Division,

In reply to the Fire Protection Industry – Public Consultation Paper I contribute the following....

1. Occupational Licensing:

I support any continued and/or further introduced licensing requirements for the Fire Industry and any community information campaigns educating the broader community about our industry. The current licensing system appears to function as purposed, however it could be under one licensing regulator.

I encourage consideration for Fire Industry licensing and permits to extend to include 10yr and 240v etc type Smoke Alarm servicing as this practice is now very common for contractors to provide to Real estates, landlords and 1b type accommodation owners/operators. Currently this is an exposed section of the Fire compliance industry for any persons to work in and as such there are often seemingly unintentional non-conformances found in particular with locations of 10yr and 240v type Smoke Alarms.

2. Application Processes:

I welcome the introduction of a digital application process as the current process is dated and clunky.

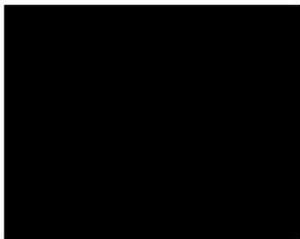
3. Audit, Compliance and Systems:

I suggest consideration be given for an online portal type platform where registered permit holders can access or raise relevant FAQs on service standards information quickly, access any Tas Fire safety alerts etc, maybe even members could upload any proactive findings and have a monitored/filtered forum type platform included.

I welcome further regulatory oversight of the Fire industry as a whole for continued improvement.

4. Industry Engagement:

I encourage any further training, education and communication that can be provided. As per section 3, I suggest consideration be given for an online portal type platform where registered permit holders can access or raise relevant FAQs on service standards information quickly, access any Tas Fire safety alerts etc, maybe even members could upload any proactive findings/photos and have a Q&A forum type platform included. With things like the constant evolving EV battery industry we need a proactive platform to contribute and access relevant information as sometimes information becomes blurry if sourcing from multiple avenues and as such our industry at times provides misinformation. A Tasmanian Fire industry portal platform could be a leader in how Fire Safety is proactively managed.



5. Communication and transparency in decision making

I consider the existing framework to be in fair working order for regulatory requirements however it would be reasonable to suggest that within the industry, it is often viewed that the industry permit committee may give rise to conflict of interests. However, it is important we include industry professionals on these committees to assist in decisions that strengthen the Fire industry.

It would be beneficial to provide some data that reflects quantities of audits and related outcomes found so the industry can continue to monitor and make improvements. The introduction of a permit holder portal to access such information would be great for industry progress and staff shares as required.

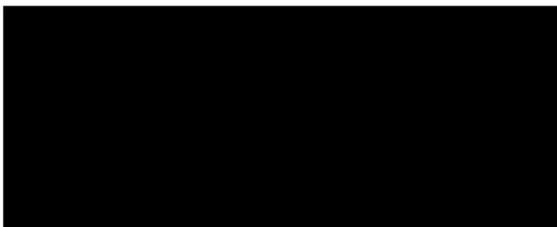
6. Other Information

I strongly encourage consideration for 10yr and 240v Smoke Alarm installation and/or servicing to be introduced within licensing and permit applications due to the increasing demand for compliance-based testing and reporting services across 1a and 1b type properties. As 1a and 1b type owners continue to convert dwellings, the risk continues to increase for misunderstanding installation and servicing requirements. Currently this is an exposed section of the Fire industry for any persons to work and as such there are often unintentional breaches found in particular with locations of 10yr and 240v type Smoke Alarms.

This permit section could be optional initially for current service providers with the view that in time to come this will be a mandatory permit requirement as regulation increases for 1a and 1b type properties requiring smoke alarm testing as we have seen other States introduce stronger regulations.

As the Fire industry evolves into further privatisation the encouragement of continued input from members will be important so Tasmania can maintain its high standard of compliance. A managed and monitored permit holder portal where all members can remain engaged and benefit would be a great addition.

Yours sincerely,





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



National Fire Industry Association Australia Ltd (NFIA)

TFS Fire Protection Industry

Public Consultation Paper

January 2026



INTRODUCTION

Thank you for the opportunity to provide feedback on the Tasmania Fire Service's (TFS) Fire Protection Industry Public Consultation Paper. The National Fire Industry Association (NFIA) welcomes this critical review, particularly in light of the [REDACTED] recommendation to investigate alternative regulatory processes. This initiative is a vital step towards enhancing public safety and industry efficiency in Tasmania while providing an opportunity to consider alignment of the regulatory framework consistent with nationally recognised best practice and regulatory harmonisation.

NFIA has championed the highest standards of safety, technical excellence, and professional integrity in Fire Protection for the last century. Our views are informed by extensive industry knowledge, evidence-based research, and key reports such as the Building Confidence Report (BCR Report) (Shergold & Weir, 2018). The current regulatory landscape for the Fire Protection Industry in Australia is highly fragmented, leading to inconsistencies, burdensome 'red tape', and critical gaps in public safety oversight. This fragmented approach often results in reactive policy development rather than a proactive, nationally consistent state/territory implemented strategy.

The Tasmania Fire Service's initiative to review its Building Safety Unit (BSU) and the subsequent [REDACTED] Report [REDACTED], which highlighted the need for improved services, underscores the imperative for reform. This aligns with broader national efforts, notably the Shergold and Weir (2018) Building Confidence Report, which identified systemic issues across the building and construction sector and recommended a nationally consistent framework for reform. Australian Building Ministers have repeatedly affirmed their commitment to implementing the recommendations of the Building Confidence Report, as evidenced by communiques from their meetings in July 2019 and June 2024 (Department of Industry, Science and Resources, 2019, 2024). These communiques explicitly state the support for a national framework to address the issues raised in the Building Confidence Report.

NFIA believes that robust, evidence-based, and industry-supported occupational and contractor licensing is paramount to achieving these objectives. Lessons from tragic incidents, such as the Childers Palace Backpackers Hostel fire, Quakers Hill Nursing Home fire, the Lacrosse Tower fire and the Grenfell Tower Inquiry in the UK, unequivocally demonstrate the devastating consequences of regulatory shortcomings and the critical need for qualified practitioners. These events underscore that fire protection is a highly specialised discipline, requiring stringent oversight and demonstrably competent practitioners.



NFIA's position is informed by decades of industry experience and a commitment to ensuring the highest standards of fire protection. The industry contributes significantly to the Australian economy, valued at approximately AUD \$3.5 billion in fire detection alone (IBISWorld, 2024). NFIA's proposed framework is designed to eliminate duplication, enhance accountability, and promote national worker mobility.

THE NATIONAL FIRE INDUSTRY ASSOCIATION

The National Fire Industry Association of Australia Ltd (NFIA), an organisation with a lineage extending to 1926, is the peak body for the Fire Protection Industry in Australia. 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 Members operate across all areas of the Fire Protection sector, including the design, construction, installation, maintenance, inspection, testing, certification and routine performance assessment of the following systems and equipment:

- passive fire protection;
- special hazard systems;
- water-based fire protection systems;
- portable fire protection; and
- electrical fire protection systems (including fire and smoke detection and alarm systems and emergency lighting).

The Australian Fire Protection Industry, generating revenue of approximately \$3.5 billion in 2023-24, is characterised by a notably low market share concentration. Despite the presence of several large multinational entities, the leading four companies constitute just over 10% of the market share. The substantial remainder, some 87.1%, is serviced by a wide array of other dedicated Australian businesses. This industry structure underscores the need for a regulatory and commercial environment that not only fosters fair and robust competition but also ensures the appropriate high standards required of every participant in a life-safety critical industry. The industry, while considered mature due to the widespread acceptance of Fire Protection services, anticipates continued growth. Projections indicate an annualised



increase of 2.3%, with revenues expected to reach upwards of \$4.0 billion by the end of 2028-29. This expansion will be significantly influenced by appropriate government fire safety regulations, the adoption of crucial technological advancements, and the escalating demands driven by population growth. Such demands are particularly acute in the construction of high-rise residential buildings – where fire protection systems are mandated in every dwelling – and vital institutional facilities like aged-care centres and hospitals.

1. Occupational Licensing

Do you have any suggestions for how licencing of the Fire Protection Industry could be more efficiently and effectively regulated?

Occupational licensing serves as a fundamental mechanism to protect the public by establishing and enforcing standards that restrict skilled practice to individuals who have demonstrated a requisite level of education, work experience, and competency. This regulatory approach aims to ensure fire protection practitioners meet a sufficient quality standard, thereby enhancing consumer confidence and mitigating risks, particularly in fields where consumers may lack the requisite knowledge to assess service quality effectively.

NFIA advocates for a comprehensive, risk-based, and nationally harmonised regulatory framework centred on competency-based occupational and contractor licensing. This framework should be underpinned by the following key principles:

- **Competency-Based Licensing:** Licensing should be tied directly to demonstrated competence and qualifications (e.g., Certificates III, IV, and Diploma qualifications in Fire Protection), ensuring practitioners possess the necessary skills for specific tasks. This includes distinct licensing levels for:
 - **Install & Maintain:** For hands-on installation and maintenance of fire protection systems.
 - **Certify:** For certifying the compliance and performance of installed or serviced systems.
 - **Design:** For the professional design of fire protection systems, requiring higher academic qualifications and specialised technical skills.



- **Automatic Mutual Recognition (AMR):** A nationally consistent licensing scheme would facilitate seamless worker mobility across jurisdictions, critical for attracting new entrants to the industry, addressing skills shortages and fostering economic efficiency.
- **Risk-Based Regulation:** Regulatory efforts should be proportionate to the risk, focusing resources where they are most needed to ensure public safety.
- **Strong Enforcement and Accountability:** The framework must include robust enforcement mechanisms and clear lines of accountability for all practitioners and contractors.
- **Continuing Professional Development (CPD):** Mandatory and measurable CPD should be a cornerstone of the framework, ensuring that licensed practitioners maintain and update their skills in line with evolving technologies and standards.
- **Leveraging Technology and Data:** Digital platforms and data analytics should be utilised to improve oversight, track compliance, and inform policy development.

NFIA recommends that TFS transition from the current permit system to a robust licensing scheme that is consistent with national best practices, ensuring a single, clear pathway for qualified practitioners to operate in Tasmania.

In other jurisdictions, occupational licensing is usually managed by the relevant government licensing department (in this case, CBOS), rather than the Fire Service. Given CBOS is already running a licensing framework for a broad range of regulatory professions, it is recommended that fire protection licensing sits with this Department.

Do you support a model where a single regulatory body oversees occupational licensing for the Fire Protection Industry in Tasmania?

The NFIA is strongly supportive of a model where a single regulatory body oversees occupational licensing. There is significant duplication of regulatory 'red tape' with both an Occupational Licensing Scheme coupled with a Permit Scheme in place. This requirement is inconsistent with the recommendations of the Building Confidence Report (2018) as well as the regulatory frameworks of other states and territories. The impacts of this impede worker mobility, noting as a country we have a national skills shortage, and highlighting the fact that this framework acts as a barrier to achieving true Automatic Mutual Recognition. The concern for the Fire Protection Industry is the likelihood that interstate practitioners will be unaware of the Permit Scheme, creating a risk to industry and the objectives of TFS in supporting a safe and compliant system of governance within fire protection.



The NFIA maintains that the most effective regulatory mechanism is a government licensing scheme underpinned by nationally recognised qualifications. Having the one licensing scheme will ensure that regulatory 'red tape' is reduced, whilst ensuring that Tasmania is consistent with other jurisdictions.

2. Application Processes

Do you have any suggestions for the most effective and efficient way to apply for Fire Protection Industry permits (licences)?

The NFIA is supportive of a streamlined application processes and the adoption of a secure online portal that is consistent with other government departments.

The NFIA submits that Queensland is an example of a jurisdiction that has moved to digital licenses, which could also be an opportunity for streamlining the licensing process.

Do you support the implementation of a secure, online-based application process for fire protection permits (licences), supported by access to advice and guidance from customer support officers?

The NFIA is supportive of this process.

3. Audit, Compliance and Systems

How might TFS enhance its services to ensure fire protection professionals consistently meet industry standards and operate within the Code of Practice?

The NFIA is supportive of the implementation of the suggestions outlined in the Paper:

- Active onsite audits conducted by TFS to verify that fire protection systems are installed, serviced, and maintained in accordance with Australian Standards and industry benchmarks.

The NFIA agrees that audits would need to be carried out on site to ensure that work is appropriately assessed.



Third party certification is also recommended in addition to compliance checks carried out by TFS. Recommendation 19 of the BCR 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 all certification should be performed by a recognised certifier rather than the system installer. The appropriate qualification for certification is a Certificate IV in Fire Systems Compliance (11002NAT). Practitioners must demonstrate experience in reviewing and analysing designs, verifying compliance, confirming proper construction and installation, and reviewing commissioning procedures. Furthermore, they are typically required to pass written assessment exams, hold appropriate levels of professional indemnity insurance, and adhere to a strict code of professional conduct.

- Verification of permit holders' work, ensuring that those authorised to operate within the fire protection industry are performing tasks that align with regulatory expectations.

Please see above in reference to the need for certification of the installation of fire protection systems. The government body managing occupational licensing should also be carrying out auditing of license holders, to ensure compliance within the industry. It is critical for the government to be the regulatory body to ensure best practice.

- Modernisation of the *Fire Protection Industry Code of Practice*, maintaining it as the central benchmark for professional conduct, technical standards, compliance requirements.

The Fire Protection Industry is constantly evolving and therefore, the NFIA is strongly supportive of the continuous review and modernisation of the *Fire Protection Industry Code of Practice*. The NFIA recommends that is an opportunity for the implementation of a co-regulatory model, where industry bodies, like the NFIA, can work with CBOS and TFS to compliment government licensing frameworks in achieving best practice, for example through the delivery of continuing professional development (CPD) schemes. These schemes must serve as a component of a mandatory licensing framework, not a substitute. It provides industry benchmarks that licensing can then legally enforce.



Do you believe TFS needs to enhance its audit and compliance capabilities to better support regulatory oversight of the Fire Protection Industry?

The NFIA is supportive of TFS enhancing its audit and compliance capabilities to better support regulatory oversight of the Fire Protection Industry.

4. Industry Engagement

How can training, education, and communication within the Fire Protection Industry be enhanced to better support practitioners and align with evolving standards and regulations?

Training and education are critical within the Fire Protection Industry. As highlighted above, compulsory and ongoing CPD programs are essential to ensure that fire protection practitioners remain current with evolving technologies, standards, and best practices. This is particularly vital in a rapidly advancing field like Fire Protection and also underpins the reasoning for modernising and regularly reviewing the *Fire Protection Industry Code of Practice*.

By incorporating requirements for CPD for each licensing class, as part of a co-regulatory model, where industry can support government to deliver best practice, this will ensure that practitioners remain agile and effective in the face of evolving challenges, preventing future gaps and maintaining a proactive stance on fire protection.

The NFIA would be pleased to support TFS in delivering training and education to the Tasmanian Fire Protection Industry and this would be in line with other jurisdictions that are moving to industry supported CPD requirements. The NFIA would also be willing to provide any relevant support in reviewing the *Fire Protection Industry Code of Practice*.

This provides an opportunity to strengthen the relationship between the NFIA and regulators to provide consistent messaging to Industry, the NFIA could also support regulators in communicating critical information through our own communication channels to practitioners.

The NFIA recommends that the occupational licensing system should be based on competency-based licensing. The framework must focus on demonstrated skills, knowledge, experience, and professional behaviours, as well as appropriate qualifications (rather than selected units of competency from within a



qualification). The appropriate qualifications for each licensing class should be underpinned by the recommendations as outlined in the National Registration Framework. This is paramount to ensuring that individuals performing fire protection work possess the practical abilities necessary to function competently and safely.

5. Communication and Transparency in Decision-making

Do you believe the current occupational licensing and permitting system provides a clear, efficient, and effective framework for regulating fire protection professionals in Tasmania?

The NFIA submits that the main issue with the current system is the inconsistencies between the occupational licensing and permitting systems. As already stated, a single licensing framework for Fire Protection is critical to ensuring that the framework is clear, efficient, effective and importantly, more closely aligned with other jurisdictions.

What changes or improvements would you recommend to strengthen transparency, accountability, and compliance?

The NFIA recommends establishing a public register of licensed Fire Protection practitioners, detailing their qualifications, scope, and disciplinary history. Furthermore, empower the licensing regulator with robust powers for risk-based auditing, investigation, and disciplinary action, including the ability to impose significant penalties and suspend/cancel licenses for non-compliance. This will enhance transparency and public trust, provide clear accountability for professional conduct, and ensures that regulatory oversight is proactive and effective in maintaining high safety standards across the industry.

Do you have any comments on the current policies and processes regulating the fire protection industry in Tasmania, particularly in relation to auditing practices and compliance monitoring?

Due to the inconsistencies across the occupational licensing and permit systems, industry is currently experiencing conflicting requirements for their work.



Under CBOS' Director's Determination, pursuant to section 20(1)(d) of the *Building Act 2016*, Categories of Plumbing Work, 4.2.1: Installation of Fire Services – "Installation of new and/ or additional fire hose reels, hydrants, or the water supply to fire services. It is the work of a licensed plumber and not of a specialist contractor who holds a Permit issued by the Tasmania Fire Service."

The General Requirements, as outlined on page 35, states that: Fire Services Work of Plumbers – "The General Fire Regulations 2021 provides that a person does not require a Chief Officer's Permit to install or maintain a fire hydrant system or fire hose reel in any building if he or she is a licensed plumber with the relevant competence."

This is in direct conflict to the **General Fire Regulations 2021, Part 2 – 8. Permits to install, routinely service or repair fire protection equipment:**

This section outlines the Chief Officer's power to issue a permit.

The Director's Determination is undermining fire protection practitioners who have a Certificate III qualification in Fire Protection, which is the correct qualification recognised around the country for this work. There is a clear distinction that this is not considered plumbing work by any jurisdiction that licenses fire protection work. Practitioners are facing the challenge of requiring a plumber to sign off on works, which has not been the case until recently.

6. Other Information

Is there any additional feedback or information you would like to share regarding the regulation of the fire protection industry in Tasmania, including any aspects not already covered such as auditing, compliance, licensing, or governance?

The NFIA wishes to provide no other additional feedback other than it is clear that there are reforms required for the Tasmanian Fire Protection Industry and we thank you for leading this work and engaging with industry.



CONCLUSION

NFIA is committed to working collaboratively with the Tasmania Fire Service and Consumer, Building and Occupational Services to develop and implement a regulatory framework that elevates industry standards, protects public safety, and supports a thriving, competent Fire Protection sector in Tasmania.

We welcome the opportunity to meet and discuss the NFIA's position and submission and thank the TFS for the opportunity to provide comment. We look forward to supporting and contributing to a more robust and nationally consistent licensing framework and appreciate your consideration of our submission.



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

39 Albany Street, Crows Nest, NSW 2065
6 Quindus Street, Beenleigh QLD 4007
213 Greenhill Road, Eastwood SA 5063
22-28 Phoenix Street, Brunswick VIC 3056

TFS Fire Protection Industry - Public Consultation
Request for Stakeholder input
January 2026.

(Comments made by this author are without prejudice)

1 Occupational Licensing

TFS issues Permits to fire protection industry professionals and then, CBOS also wants to license the same person or business under their 'fire builder' category (which doesn't really reflect the work done by Fire Protection Industry Contractors). This is double-dipping in both financial cost and time needed to provide the required competencies evidence to both organizations.

It creates additional layers of bureaucracy for Permit Holders to deal with and serves little purpose other than fund raising for the two respective government organizations.

CBOS has a list of all accredited practitioners available on their website for public viewing, whilst TFS does not list their Permit Holders, despite years of requesting this information be made available to the community and other Permit Holders. Why do TFS not publish this important information?

2 Application Processes

The current TFS Permit Committee model used to assess and re-assess applicants for Fire Protection Permits to work in the fire protection industry in Tasmania is, I believe, flawed. It does not adequately reflect community expectations for the licensing of practitioners in this space. This whole process is 'shrouded in secrecy' and not open and transparent as it needs to be.

This 'secrecy' which has always surrounded the Permit Committee relates to whom the members are on this Committee, and what qualifications do they have to sit in judgement of new and renewal applicants?

It is known that TFS Building Safety personnel are on this Committee, but how many TFS members are there versus how many 'industry representatives'? Of concern is that these industry representatives are or will become competitors of any new or renewed Permit Holder that is successful in their application. This is certainly not a fair and impartial process and presents poorly as such, to not only other Permit Holders but to the wider community in general. How can people who are/will be business competitors be fair and impartial in their assessments of new or renewed applicants for a TFS Permit?

Also, there is never any information made public about who is applying for, or indeed who is, a TFS Permit Holder.

I believe a complete overhaul of the Permit Committee membership and its roles and responsibilities is required and this information **be made public and remains public**, rather than being 'hidden' behind closed doors and protocols as it is currently and has historically been so for as long as I can remember.

3 Auditing, compliance and support

AUDITING AND COMPLIANCE

Some TFS Building Safety Consultants have no formal qualifications in built environment Standards, Codes and Regulations (*some do, and this is acknowledged*). This appears to be a rather one-sided situation, whereby those who are tasked with officially commenting on the work of Permit Holders to Building Surveyors, other Building Trade professionals, and members of the public do not have any formal competencies other than Firefighter or similar qualifications themselves.

Whilst TFS Permit Holders are required to have documented evidence of skills competency, and undertake Continuing Professional Development (CPD) activities to be able to complete the various fire related activities they are permitted to do, what competencies and CPD in relation to the applicable Australian Standards and Building Codes and Regulations, do those who inspect and comment upon their work, have? And is this evidence available for public viewing?

SUPPORT – Currently there is a lack of efficient follow up when matters of non-conformances are reported to TFS Consultants by Permit Holders.

This leads to dissatisfaction amongst those who complete compliant work because it takes more time, more effort and more cost to do things properly. It's very hard to convey to Permit Holder team members the need for compliance when some others do substandard job without following the required codes and guidelines.

4 Industry engagement

As a member of both the FPAA (Corporate) and IFE Aust (Associate member), Fire Systems Tasmania and me personally, are kept up to date with fire and build environment events and future changes and refinements, to make for safer buildings and increased public safety.

There were once newsletters and periodic communications from TFS Building Safety that made Permit Holders aware of change and future requirements, but unfortunately this has long ceased which is unfortunate. There is very little industry engagement in this space originating from TFS, which is a pity.

5 Communication and transparency in decision making

Unfortunately, as mentioned above, there is currently very little by way of communication between the TFS and its Permit Holders.

It would be good to know what 'issues' TFS are finding when field inspections are being conducted, what things are being considered for change in the Codes of Practice, and any new and relevant information that affects the work that fire protection industry practitioners are involved with.

I have known examples of where unsuccessful Permit re-applicants have had their customer base contacted by some of these 'industry representatives' from the Permit Committee, advising them that their current Fire Protection System/s maintenance provider has not had their TFS Permit renewed (insider information), and then offering their maintenance services BEFORE the outcome is made public. This activity could be deemed to be illegal if someone chose to make a complaint to a relevant authority and pursue the matter further. It certainly does not bode well for the Tasmania Fire Service in the community.

I have had seen cases of where the relevant Australian Standards, Building Codes and Building Regulations have all been complied with, however additional, and quite often expensive 'other things', have been listed as being required in the Chief Officers Occupancy Report that have no basis in Standards, Codes or Regulations, other than being a TFS 'want'. This makes it very difficult for Designers and Installers and obviously costly for the Building Owner who risks having to pay more for these requirements after the completion of their project.

6 Other relevant information and suggestions

Perhaps consideration should be given to licensing individuals installing, testing and maintaining fire safety systems in Tasmania, rather than just the companies they work for as is currently the case. Portable fire equipment technicians are individually licensed already even though most are employed by individual businesses or organizations. Many larger electrical or mechanical businesses who also do fire safety systems works use team members who are not fully conversant (or accredited) with Standards, Codes and Regulations regarding the installation of fire safety systems – this appears to be at odds with the intent to have only suitably trained and qualified installing, testing and maintaining these systems.

I understand that one of the roles of TFS Building Safety is as Reporting Authority to Building Surveyors, but perhaps a simple phone call to the Fire System/s Installation Contractor regarding perceived defects may be more efficient than writing multiple page reports to Building Surveyors. This used to happen some years ago and was efficient in resolving 'minor' issues of perceived non – compliance, and was I believe more efficient. This would alleviate some time writing up items in Reports that could potentially easily be addressed and confirmed via a phone call and/or photographic evidence.

As a company who also has team members involved in preparing Evacuation Plans and Emergency Plans for other businesses, we find great inconsistencies between the TFS Building Safety Consultants who review these Evacuation Plans in the North and South of the State in regards what is required within these documents. I freely acknowledge there are guidelines publicly available on the TFS website that detail what is required in Evacuation Plans, but unfortunately inconsistencies occur between the reviewers of these plans.

A prime example of this is about evacuation (the orderly movement of people from a place of danger AS 3745 – 2010. Particularly (where we are concerned) with full evacuation. [This measure is used to clear a building or facility of all occupants. AS 3745 – 2010, p23].

The response from the TFS is often different—it seems to depend on who reviews the evacuation plan. Consistency is necessary, and responses should follow the guidelines set out on the TFS website.

In closing, thank you for allowing us the opportunity to make these comments and to provide input for the Fire Protection Industry Review.

[REDACTED]

[REDACTED]

29/01/2026

Department of Justice

Consumer, Building and Occupational Services
30 Gordons Hill Road, ROSNY PARK TASMANIA 7018
PO Box 56, ROSNY PARK TASMANIA 7018
P 1300 654 499
E [REDACTED]@justice.tas.gov.au W justice.tas.gov.au



Tasmania Fire Service: Discussion Paper on licensing of installers of fire services systems/ equipment in buildings.

Submission from [REDACTED], Building and Occupational Services (Department of Justice)

1. Occupational Licensing issues in paper:

Questions:

- *Do you have any suggestions for how licencing of the fire protection industry could be more efficiently and effectively regulated?*
- *We're particularly interested in ideas that could enhance consistency, reduce duplication, streamline processes, and lower costs to practitioners – while maintaining high safety and professional standards.*
- *Do you support a model where a single regulatory body oversees occupational licensing for the fire protection industry in Tasmania?*
- *Consolidating administration and licencing under one authority could help streamline processes, reduce duplication, and lower compliance costs.*

CBOS Response:

For consistency of building code standards, and for consumer protection and public safety, CBOS supports an occupational licensing model where all designers, builders and plumbers (including practitioners undertaking all types of fire protection work), and building surveyors, are suitably licensed.

That model should include these key elements:

- establishment of appropriate prerequisites for new applicants for a licence, including contemporary standards for the education, training and experience of licensees
- mandatory continuing professional development of licensees
- mandatory insurance of licensees (or held by their employer)
- licensing of corporate bodies as well as individuals
- adherence to codes of conduct
- auditing of the work and conduct of licensees.

These elements are current features of the *Occupational Licensing Act 2005* that has been in operation since 2008. Under this Act, all building services providers (as contractors for work) and plumbers (contractors and practitioners) are licensed, but not the tradesperson level installers of fire protection work and services.

Under the General Fire Regulations 2021 (the Regulations) the Chief Officer may issue a permit for the installation, maintenance or repair of fire protection equipment.

The current dual licensing system divided between the Chief Officer and the Administrator of Occupational Licensing is a relic from a time where there was no comprehensive licensing system for the building industry. In 2004, the *Building Act 2000* commenced, providing for the licensing of all building contractors, including for the category of builder-fire protection.

Department of Justice

Consumer, Building and Occupational Services
30 Gordons Hill Road, ROSNY PARK TASMANIA 7018
PO Box 56, ROSNY PARK TASMANIA 7018
P 1300 654 499
E [REDACTED]@justice.tas.gov.au W justice.tas.gov.au



However, that Act did not require licensing of tradespersons, and therefore the existing permit system for tradespersons engaged in installation fire protection work has continued.

CBOS considers that having two licensing models operating in tandem for this industry sector is inefficient and does not deliver any benefits for industry, regulators or consumers. On this basis, CBOS supports a single regulatory body overseeing occupational licensing for the fire protection industry in Tasmania, and CBOS being that regulatory body (subject to additional resourcing being allocated to effectively perform this function).

As background to this issue, In February 2019, the TFS approached CBOS with a proposal to formally discuss the transfer of the Permit – Fire Protection Equipment system to become part of the licensing system operated by CBOS under the *Occupational Licensing Act 2005*. CBOS met with senior officers of the TFS to discuss a potential new occupational licensing model for CBOS to operate a licensing framework on behalf of the TFS for their permit holders.

The TFS then conducted a review of their Act and their organisation (the [Blake Review](#) released in October 2020). Regarding licensing matters, it recommended no change to the TFS permit system and recommended against fire protection installers coming under the CBOS licensing system. It reported that:

‘the Occupational Licensing Act is not suitable legislation from which to license and permit contractors working in the fire protection industry.’

2. Application Processes

- *Q: Do you support the implementation of a secure, online-based application process for fire protection permits (licences), supported by access to advice and guidance from customer support officers?*

CBOS Response:

Yes. CBOS supports the establishment of a comprehensive online system for the licensing of permit holders, with clear requirements for what are acceptable entry standards.

CBOS currently operates an online licensing system that is successfully used by thousands of licensees from many types of occupations. We safeguard data, ensure accuracy and timeliness of information, and keep systems up to date with evolving risks and technologies.

We welcome any opportunity to provide assistance and lessons learned from CBOS's systems for the TFS.

3. Audit, Compliance and Systems

- *Q: Do you believe TFS needs to enhance its audit and compliance capabilities to better support regulatory oversight of the fire protection industry? Increased auditing, more frequent inspections, or improved compliance tools could help ensure industry standards are consistently met.*

CBOS Response:

CBOS has no comments regarding the auditing activities of the TFS.

However, from a general regulatory perspective, an effective modern occupational licensing model requires:

- Clear compliance requirements in legislation

Department of Justice

Consumer, Building and Occupational Services
30 Gordons Hill Road, ROSNY PARK TASMANIA 7018
PO Box 56, ROSNY PARK TASMANIA 7018
P 1300 654 499
E [REDACTED]@justice.tas.gov.au W justice.tas.gov.au



- Code of Conduct for practitioners
- A system of prescribed work certification
- Audit and compliance schedules
- Trained and knowledgeable staff able to undertake audits, including of technical building or plumbing matters.

4. Industry Engagement

- *Q: How can training, education, and communication within the fire protection industry be enhanced to better support practitioners and align with evolving standards and regulations?*

CBOS Response:

Fire safety in buildings is a vital activity for public safety. It is essential to invest in the capability of the sector through structured workforce planning and development. We suggest:

- Modernising the licensing system for Permit Holders in the fire protection sector, with clear identification of minimum qualifications and experience requirements for new entrants, which will support the industry to adapt to technological advancements and innovative changes to the design of commercial buildings.
- For existing permit holders who could be transitioned into an occupational licensing system, a new requirement for mandatory continuing professional development provides an opportunity to address current skills gaps.

5. Communication and transparency in decision making

- *Q: Do you believe the current occupational licensing and permitting system provides a clear, efficient, and effective framework for regulating fire protection professionals in Tasmania?*

CBOS Response:

We have no relevant comments on this issue.

6 Any other feedback

Issue: Clarify scope of work – Fire Protection Services

Some stakeholders in the Fire Protection industry have sought clarification from CBOS regarding the scope of work, which a plumber, licensed in Tasmania under the Occupational Licensing Act, can perform without additionally having to become a permit holder.

These issues chiefly relate to installation of fire protection systems or equipment reliant on a water supply, including fire hose reels, hydrants, or sprinkler systems.

While the General Fire Regulations 2021 provide that a person does not require a permit to install or maintain a fire hydrant system or fire hose reel if he or she is a licensed plumber with the relevant competence, CBOS considers that further work could be considered, to simplify and clarify this area.

Department of Justice

Consumer, Building and Occupational Services
30 Gordons Hill Road, ROSNY PARK TASMANIA 7018
PO Box 56, ROSNY PARK TASMANIA 7018
P 1300 654 499
E [REDACTED]@justice.tas.gov.au W justice.tas.gov.au



It is also noted that in some other states that operate a unified licensing regime for fire protection work, there is greater clarity regarding the scope of work of various categories of licensees involved.

CBOS would be pleased to meet with the TFS to discuss this issue, and if appropriate, to establish a working group to consider this matter in more detail and to prepare potential solutions.

Attachments for reference:

Table: 1

- How fire protection work/ services is regulated in Tasmania, regarding licensing of persons.

Appendix 1:

- General types of fire protection systems/ features, related to occupations.

Appendix 2:

- What is a fire protection/ safety system?

Appendix 3:

- Types of fire protection work and summary of who can do their installation.

Department of Justice

Consumer, Building and Occupational Services
 30 Gordons Hill Road, ROSNY PARK TASMANIA 7018
 PO Box 56, ROSNY PARK TASMANIA 7018
 P 1300 654 499
 E [REDACTED]@justice.tas.gov.au W justice.tas.gov.au



Table: 1

How Fire Protection Work/ Services is regulated in Tasmania, regarding licensing of persons:

Legislation	<i>Occupational Licensing Act 2005</i>	<i>Fire Services Act 1979 and General Fire Regulations 2021</i>
Persons covered by the legislation:	1. Licensed building services providers, meaning the head contractors providing construction services to the owner/ developer. Inclusive of licence categories of: <ul style="list-style-type: none"> a. Builder- General Construction; or b. Builder Fire Protection Services: 	<ul style="list-style-type: none"> • Permit holders (tradespersons) for performance of specialist fire protection work/ Services as part of new building work, working for the licensed builder (head contractor); • Or for performing minor maintenance or minor repairs of fire protection services/ equipment, under a contract with the building owner.
	2. Licensed Plumber	Water supply work related to water-based fire protection services/ equipment.
Examples of their work:	<p>Builder - General Construction:</p> <ul style="list-style-type: none"> • Oversight and management of entire new building project including engagement of general tradespersons and specialist fire protection trades (Permit Holders); A General Builder's licence issued under the OLA authorises the licensee to only supervise the Permit Holders who will personally carry out fire protection work. <p>Builder - Fire Protection Services:</p> <ul style="list-style-type: none"> • As part of performance of new building work, a Builder Fire Protection is authorised to personally carry out fire protection work (if a holder of a TFS Permit), or to supervise the work of Permit Holders who are engaged or employed by the builder. <p>Plumber:</p> <ul style="list-style-type: none"> • Install fire collars to plumbing services; 	<p>Permit Holders install:</p> <ul style="list-style-type: none"> • Sprinkler systems; • Fire and smoke alarms in Class 2-9 (commercial) buildings • Fire control centres • Stairwell pressurisation • Air-handling systems, including operational controls and indicators. • Smoke and heat vents, • Smoke exhausts • Emergency warning and intercommunication systems

Department of Justice

Consumer, Building and Occupational Services

30 Gordons Hill Road, ROSNY PARK TASMANIA 7018

PO Box 56, ROSNY PARK TASMANIA 7018

P 1300 654 499

E [REDACTED]@justice.tas.gov.au W justice.tas.gov.au



	<ul style="list-style-type: none">• Installation of the water supply for connection to sprinkler systems, misters; or• Complete installation of hose reels, fire hydrants.	<ul style="list-style-type: none">• Portable Fire Blankets• Portable fire extinguishers
--	---	--

Appendix 1:

General types of fire protection systems/ features

No.	System/ feature type	Related to these occupation types:
1.	Water based systems (suppression/ fire fighting) including sprinkler, hydrants and hose reels.	Hydraulic/ plumbing
2.	Fire Detection alarm and warning systems	Electrical
3.	Emergency and Exit lighting systems	Electrical
4.	Passive Building fire and smoke systems	Structure related - builder
5.	Building integrity	Structure related - builder
6.	Means of egress	Structure related – builder
7.	Air handling systems (fire related)	Mechanical ventilation contractor
8.	Portable fire fighting equipment	N/A

Appendix 2:

What is a fire protection/ safety system?

From the Building Regulations 2016: Numbers relate to the occupation types in Appendix 1:

'Fire safety system' includes any one or more of the following:

- (a) booster assemblies; 1
- (b) fire mains, hydrants and hose reels; 2
- (c) sprinklers; 1

Department of Justice

Consumer, Building and Occupational Services

30 Gordons Hill Road, ROSNY PARK TASMANIA 7018

PO Box 56, ROSNY PARK TASMANIA 7018

P 1300 654 499

E [REDACTED]@justice.tas.gov.au W justice.tas.gov.au



- (d) fire and smoke alarms; 5
- (e) fire control centres; 3
- (f) provisions for special fire hazard premises;
- (g) stairwell pressurisation; 5?
- (h) air-handling systems; 5
- (i) smoke and heat vents; 5
- (j) smoke exhausts; 5
- (k) emergency lifts; ?
- (l) emergency warning and intercommunication systems; 3

Appendix 3: Types of Fire Protection Work and who can do their installation				
No.	Work type (from Schedule 1, Building Regulations 2016:)	CBOS Licence?	TFS Permit?	Comments
1	Emergency vehicle access	Yes – General Builder for whole building	No	
2	Fire mains, including – (a) suitability of water flows and pressure; and (b) location of control valves.	Yes - Plumber for a Water supply	No	
3	Hydrants and hose reels, including – (a) location of external and internal hydrants and hose reels; and (b) fire separation of hydrant from adjoining buildings; and (c) provision of – (i) roof hydrants; and (ii) hard standing for fire appliances; and (d) suitability of type of hose connections; and	Yes - Plumber	No	

Department of Justice

Consumer, Building and Occupational Services

30 Gordons Hill Road, ROSNY PARK TASMANIA 7018

PO Box 56, ROSNY PARK TASMANIA 7018

P 1300 654 499

E [REDACTED]@justice.tas.gov.au W justice.tas.gov.au



Appendix 3: Types of Fire Protection Work and who can do their installation				
No.	Work type (from Schedule 1, Building Regulations 2016:)	CBOS Licence?	TFS Permit?	Comments
	(e) booster assembly including – (i) provision of portable relay boost pump; and (ii) location and suitability of fire authority booster connections and enclosures			
4	Sprinklers (including wall-wetting sprinklers), including – (a) location of valve room, pumps and water alarm; and (b) location and suitability of fire authority booster connections and enclosures; and (c) provision for signage; and (d) connection of alarm to fire authority; and (e) location of sprinkler heads; and (f) location of isolation valves.	No	Yes	
5	Fire and smoke alarms in Class 2-9 buildings, including – (a) location of – (i) fire indicator panels and sub-indicator panels; and (ii) local warning devices; and (iii) repeater or mimic panel; and (iv) manual call points; and (v) heat and smoke detectors and alarms; and (vi) other heat or smoke-sensing devices; and (b) weather protection of, accessibility to and lighting of equipment; and (c) connection of alarm to fire authority; and (d) suitability of either smoke or heat detection systems or other heat or smoke-sensing devices; and (e) suitability of detectors in critical areas to avoid unwanted alarms.	No	Yes	
6	Fire control centres, including – (a) location of control centres; and	No	Yes	

Department of Justice

Consumer, Building and Occupational Services

30 Gordons Hill Road, ROSNY PARK TASMANIA 7018

PO Box 56, ROSNY PARK TASMANIA 7018

P 1300 654 499

E [REDACTED]@justice.tas.gov.au W justice.tas.gov.au



Appendix 3: Types of Fire Protection Work and who can do their installation				
No.	Work type (from Schedule 1, Building Regulations 2016:)	CBOS Licence?	TFS Permit?	Comments
	(b) size and contents of control centres; and (c) ventilation, signage, lighting and sound levels			
7	Provisions for special fire hazard premises, including – (a) location of additional fire hydrants; and (b) accessibility for fire authority vehicles; and (c) suitability of extinguishing agent; and (d) provision, and suitability, of smoke hazard management systems; and (e) connection of alarm to fire authority; and (f) suitability of flows and pressures relating to fire mains.	No, except Item (f)??	Yes	
8	Stairwell pressurisation, including – (a) emergency operation controls and indicators; and (b) location of actuation detectors.	No	Yes	
9	Air-handling systems, including operational controls and indicators.	Yes, Plumber - Mechanical Services	?	Not mentioned in TFS Code of Practice document
10	Smoke and heat vents, including – (a) operational controls and indicators; and (b) location of actuation detectors.	No	Yes	
11	Smoke exhausts, including – (a) operational controls and indicators; and (b) location of actuation detectors.	No	Yes	
12	Emergency lifts, including fireman's lift controls.	No	No?	Specialist contractor for lift installation
13	Emergency warning and intercommunication systems, including – (a) provision of suitable auxiliary warning device; and	Yes - Licensed electrical contractor	Yes	

Department of Justice

Consumer, Building and Occupational Services

30 Gordons Hill Road, ROSNY PARK TASMANIA 7018

PO Box 56, ROSNY PARK TASMANIA 7018

P 1300 654 499

E [REDACTED]@justice.tas.gov.au W justice.tas.gov.au



Appendix 3: Types of Fire Protection Work and who can do their installation				
No.	Work type (from Schedule 1, Building Regulations 2016:)	CBOS Licence?	TFS Permit?	Comments
	(b) location of – (i) warden intercommunication point; and (ii) master emergency control point; and (iii) sounders.			
14	Fire safety requirements proposed as part of an alternative [performance] solution in a bushfire-prone area.	Designer only	No	Not services in a building
15	Provision of documentation and signage required under the relevant Australian Standard including – (a) design documentation; and (b) commissioning reports and installer statements; and (c) signage and operating instructions	Builder responsible	Yes?	
16	<ul style="list-style-type: none"> Building elements required to satisfy prescribed fire resistance levels (Fire rated walls and floors) Materials and assemblies <i>required</i> to have <i>fire hazard properties</i> Elements <i>required</i> to be <i>non-combustible</i>, provide fire protection, compartmentation or separation 	Yes - builder	No	Building structure is work of a licensed general builder

Department of Justice

Consumer, Building and Occupational Services

30 Gordons Hill Road, ROSNY PARK TASMANIA 7018

PO Box 56, ROSNY PARK TASMANIA 7018

P 1300 654 499

E [REDACTED]@justice.tas.gov.au W justice.tas.gov.au



Appendix 3: Types of Fire Protection Work and who can do their installation				
No.	Work type (from Schedule 1, Building Regulations 2016:)	CBOS Licence?	TFS Permit?	Comments
17	Fire shutters <ul style="list-style-type: none"> • Solid core doors and associated self-closing, automatic closing and latching mechanisms • Fire-protection at service penetrations through elements required to be fire-resisting with respect to integrity or insulation, or to have a resistance to the incipient spread of fire • Fire protection associated with construction joints, spaces and the like in and between building elements required to be fire-resisting with respect to integrity and insulation. • Smoke doors and associated self-closing, automatic closing and latching mechanisms • Fire collars, penetrations and joint sealing 	Yes – general builder, except fire collars on plumbing services by a plumber.	?	
18	Portable Fire Blankets	No	Yes	
19	Portable fire extinguishers	No	Yes	
20	Emergency Lighting	Yes - Electrician	No	
21	Gaseous and non-gaseous fire suppression systems inc. pre-engineered systems	? Gas fitter?	Yes	
22	Domestic smoke alarm	No	No	

From:

[Redacted]

You don't often get email from rhalton@degreec.com.au. [Learn why this is important](#)

Hi

I would welcome the opportunity to participate in any way with regulation of the fire protection industry in Tasmania.

My background has included [Redacted]

I [Redacted] S.

I worked closely with the [Redacted] team as one of the Fire Industry Representatives to get the licencing up over several years and as they were the first I look back proudly as I've seen Fire Compliance improve across the Fire Industry and Owners/Occupiers alike because no one can plead ignorant anymore.

So I'm have to assist in any way.

Regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]



From: BSU.Project <BSU.Project@fire.tas.gov.au>
Sent: Monday, December 8, 2025 10:30:49 AM
Subject: Public Consultation – Fire Protection Industry

This Message originated outside your organization. Do not click links, open attachments or action requests unless you know the content is safe.

Dear Stakeholder,

The Tasmania Fire Service (TFS) is undertaking a Public Consultation on the regulation of the fire protection industry in Tasmania. This initiative follows recommendations from an independent review into building fire safety services and aims to strengthen regulatory practices and improve systems, processes, and services.

The consultation paper, titled *Fire Protection Industry Public Consultation*, outlines six key areas for feedback:

- Occupational licensing
- Application processes
- Auditing, compliance, and support
- Industry engagement
- Communication and transparency in decision-making
- Other relevant issues and suggestions

Consultation Period:
Open until 30 January 2026.

How to Access the Paper:

You can view the consultation paper on the Tasmania Fire Service website at:

<https://www.fire.tas.gov.au/about/community-consultations/>

A copy of the paper is also attached to this email for your convenience.

How to Provide Feedback:

Written submissions may be sent via email to cfs.admin@fire.tas.gov.au or posted to:

Community Fire Safety

GPO Box 308

Hobart TAS 7001

Your input is highly valued and will help shape future reforms for the fire protection industry.

Thank you for your contribution to this important process.

Regards,

Tasmania Fire Service

CONFIDENTIALITY NOTICE AND DISCLAIMER

The information in this transmission may be confidential and/or protected by legal professional privilege, and is intended only for the person or persons to whom it is addressed. If you are not such a person, you are warned that any disclosure, copying or dissemination of the information is unauthorised. If you have received the transmission in error, please immediately contact this office by telephone, fax or email, to inform us of the error and to enable arrangements to be made for the destruction of the transmission, or its return at our cost. No liability is accepted for any unauthorised use of the information contained in this transmission.