



**10 May 2024**

# Commissioning, Certification, Ongoing Testing, Maintenance - Fire Safety Reforms

## **OVERALL GUIDING COMMENTS ON PRINCIPLES NEEDED**

### **Installation and commissioning of fire safety systems and**

### **Certification, ongoing testing and maintenance of fire safety systems**

- Are qualified, registered design engineers and architects involved in this review process? They are best qualified to comment.
- Existing legislation needs to be simplified and amalgamated into one overarching document/act for comprehensive ease on understanding for each category of building.
- Overarching accountability for all design is required by a suitably qualified practitioner who will required input from specialist designers.
- Ongoing review process to ensure all categories of designers and installers are suitably qualified with penalties to be applied if found to be not qualified.
- Mandated approved training courses for all categories of personnel involved followed by registration to be reviewed annually

- During construction a mandatory requirement of inspection and certification by the designer must be undertaken at all stages of installation.
- Commissioning should be undertaken by an independent design practitioner who was not involved with the original design to ensure compliance with regulatory requirements and design specification. They may need to reference the original designer if not straight forward.
- Minimum standard specifications and testing of all products is required to ensure that all elements meet the minimum requirements. (eg. Flammable panels were never independently tested but relied on paper certifications).

Further points:

**Certifiers:**

#1. Due the lack of skilled workers change needs to be managed “gently” with staged and associated additional training that is not overly onerous on the new breed of Certifiers required. This is to manage the cost base for property owners.

**#2. Two (or Three) Categories of Certifier:**

**A:** Those that can install & sign off on lower / smaller properties AND work on larger properties but without the ability to sign off on them.

**B:** "Senior Certifiers" that can do the final sign off on the satisfactory integration of different fire safety systems within a taller structure (say upto 10 storeys)

Note: Individual element sign off by lower grade Certifiers

**C:** "High Rise Certifiers" ..... for Grenfell Tower sized buildings.

### **#3. Mutual Recognition:**

Needs to be sensibly managed as this has been a major issue in the Swimming Pool environment where the majority of Certifiers came in through the softer Queensland criteria .... which has resulted in some new very sub-standard individuals engaging in Certification work.

Compulsory annual CPD's are clearly sensible.

### **#4. Application**

**A.** Softer regulations are reasonable for less risky, smaller & lower buildings, which needs to be reflected in the legislation. This is because egress from these buildings can be via windows and fire ladders.

**B.** The ultimate responsibility for Fire Safety Compliance should rest with the Fire System Integration Certifier (where appropriately required)  
... or the Fire Elements Certifier if a low rise.

**C.** Maintenance / rectification work needs to be able to be carried out by the builder with the lowest level of Fire Certifier able to inspect and sign off that "like for like" has been installed.  
..... If a significant change of equipment etc has occurred then a more senior Certifier will need to confirm that the integrated Fire Safety System will still perform the functions required.

### **#5. Working Drawings vs Built Drawings**

This is a critical element that each level of Certifier should be aware of and encouraged to focus on.

The ultimate Certifier will have the final responsibility that the fire safety system is sufficient to manage the actual built environment.

Prepared by:

Simon Ruben and Mark Dodgson (licensed builders, fire safety consultants and retired engineers) , POANSW committee members.

[simon@poansw.com.au](mailto:simon@poansw.com.au)

[Mark@poansw.com.au](mailto:Mark@poansw.com.au)

Ph. 02 9363 3949