

26 January 2017

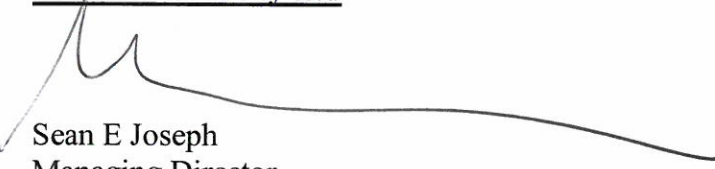
The Secretary
Department of Planning & Environment

Dear Secretary,

Proposed Changes to the Environmental Planning and Assessment Regulation 2000

We attach Submission in our capacity as Automatic Fire Alarm Service Provider to Fire & Rescue NSW.

Yours truly,
Romteck Grid Pty Ltd


Sean E Joseph
Managing Director

SUBMISSION

Environmental Planning and Assessment Amendment (Fire Safety and Building Certification)
Regulation 2017

Commentary on Proposed Fire Safety Changes to the Environmental Planning and
Assessment Regulation 2000

26-01-17

Capacity

Romteck Grid Pty Ltd is making this Submission in its capacity as the largest Automatic Fire Alarm Monitoring Service Provider to Fire & Rescue NSW.

Overview

This submission addresses Clause 167A and the proposals outlined in the Commentary to issue a 'guide' to assist PCAs and building owners pending the accreditation framework coming into effect.

In particular, the first of the eight areas outlined on page 4 of the Commentary being:

'The involvement of competent fire safety practitioners in certain specialist fire safety functions.'

Automatic Fire Alarm Service Providers ('AFASP')

AFASP are contracted by Fire & Rescue NSW ('FRNSW') and provide the specialist function of automatic fire alarm monitoring.

Under the provisions of the contract FRNSW has extensive control over the AFASP including: supervision; audit; and access to monitoring premises & all records.

Fire alarm monitoring is a 'hybrid' function in that the great majority of the tasks are performed at monitoring centres not the protected building.

The Fire Industry is only just beginning the journey to accreditation whereas the Monitoring Industry in NSW commenced this journey decades ago and comparatively speaking is at a very high level. Monitoring operators are licenced and supervised by the NSW Security Industry Registry and there is an extensive array of compulsory training modules plus fit and proper persons provisions extending to fingerprinting etc.

Certification of the 'Fire Link'

Currently, a number of Certifying Authorities in NSW require certification from AFASP regarding the automatic fire alarm monitoring for both fire safety certificates & fire safety statements.

This is obviously a highly specialised task with the majority of the functions being performed away from the relevant protected building.

We as an AFASP refuse to issue certification in a number of cases including where the building owner has failed to provide or maintain the required ASE communications link or where the monitoring records show there has not been an 'end-to-end' test of the fire system to the FRNSW Network in the last three months. This is a valuable safeguard as it forces building owners to maintain their systems and in many cases forces them to engage a fire contractor to service and test their fire alarm system.

The current system is defective, however, in that some Councils and others do not require to sight certification from the AFASP; owners or their 'properly qualified persons' are providing fire safety statements without assessing or addressing deficiencies in the automatic fire alarm monitoring.

Recommendations

1. The guide referred to in the Commentary to assist PCAs and building owners pending the accreditation framework coming into effect - Clause 167A (4) - should specify employees of an AFASP under contract to FRNSW are competent fire safety practitioners solely for the purpose of certifying the automatic fire alarm monitoring ('fire link') for both fire safety certificates & fire safety statements and for no other purpose.
2. The guide should specify any competent fire safety practitioner certifying buildings with automatic fire alarm monitoring for either fire safety certificates or fire safety statements should obtain matching certification of the 'fire link' from the AFASP.
3. Under the provisions of Clause 167A (1) & (2) employees of an AFASP under contract to FRNSW should be recognised as competent fire safety practitioners solely for the purpose of certifying the automatic fire alarm monitoring ('fire link') for both fire safety certificates & fire safety statements and for no other purpose.

Notes

These recommendations are designed to ensure the specialist task of automatic fire alarm monitoring is properly considered by a fire safety practitioner competent to assess 'fire link' including access to and understanding of the signals to the Fire & Rescue NSW Network.

They are also necessary to avoid extensive delays during transition and commencement periods; we as an AFASP provide automatic fire alarm monitoring to well over 6,000 buildings in NSW and we are currently issuing fire safety certificates or fire safety statements for more than sixty (60) buildings a week.

The figure of sixty (60) buildings a week also indicates at least 3,000 buildings in NSW monitored by this AFASP are having fire safety statements issued each year without assessment by the AFASP that the 'fire link' is fully operational and there have been 'end-to-end' fire alarm tests to the FRNSW Network in the last three months. This is an ideal opportunity to rectify this deficiency in the current certification system.