

Regulation of Fire Safety Systems (Design)

Creating a discrete testing and maintenance accreditation sub-class for licensed electrical contractors to improve the fire safety of NSW buildings.

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Master Electricians Australia (MEA) is the trade association representing electrical contractors recognised by industry, government and the community as the electrical industry's leading business partner, knowledge source and advocate. You can visit our website at www.masterelectricians.com.au

MEA has submitted a formal application to become an NSW accreditation authority for a discrete sub-class of testing and maintaining electrical fire safety systems (i.e. emergency exit and lighting and electrical smoke alarms). The current system requires licenced electrical contractors to complete the comprehensive FPAA accreditation before being permitted to perform testing and maintenance functions on electrical fire safety equipment.

We have applied for, and will advocate throughout these submissions, that a separate 'fit for purpose' discrete sub-class of accreditation is to be established, allowing for licenced electrical contractors to perform maintenance and testing of electrical fire safety equipment without having to complete the full accreditation. Our members are predominately not concerned with being involved in the design of fire safety systems, but just in the maintenance, testing, and recertification of the discrete electrical aspects of exit & emergency lighting, and smoke alarms.

Please note, MEA are concerned with the second stage of discussions relating to testing/inspection and maintenance. Our expertise does not lie with the design phase of NSW's fire safety system regulations, and we will therefore not be responding to all questions in the discussion paper.

Discussion Questions

Case for Change

Q1. What gaps in the current regulatory framework do you consider could impact the proposed model that could compromise fire safety?

Beyond MEA's scope of expertise.

Q2. Do you have any overarching comments on the proposed approach to fire safety licensing that could help inform the development of the model and further discussion papers?

MEA strongly advocate that testing and maintenance of already designed and certified systems should have a discrete class for issuing fire safety statements for a specified aspect of fire safety systems (i.e. exit and emergency lights and electrical smoke alarms). The current regime requires licenced electrical contractors to complete broader competency requirements, including classes of work which electricians are not involved in.

Testing and maintenance of electrical fire safety infrastructure in buildings falls within the electrical industry's expertise and certification requirements should reflect this by creating a discrete accreditation for licenced electrical contractors to perform testing and maintenance of electrical fire safety equipment in line with their daily operations. In fact, the only class of worker that can install, and replace LV electrical fire equipment are licenced electricians.

Q3. Should the new licensing requirements be applicable to all classes of buildings (except for class 1a and class 10 buildings/structures)?

Yes. Ensuring fire safety and competency of all buildings is imperative.

Q4. What regulatory burden impacts should be considered before the fire safety regulatory framework is finalised?

Echoing our response to Q2, we believe compliance testing and maintenance of electrical fire safety systems should be made easier for certified and accredited licenced electrical

contractors under a discrete aspect of the accreditation system. This would reflect the purpose of the current review of NSW's fire safety systems regulations to improve fire hazard safety in buildings by recognising and encouraging more licenced electrical contractors to become accredited in testing and maintenance under this discrete class. It would also improve the uptake of compliance by building managers, by making the important process of testing, repair and issuing of fire safety statements for exit & emergency lighting and smoke alarms more accessible and affordable by using their regular electrical contracting firm to perform this function.

Q5. Are there any other fire safety systems that should be included in the regulated fire safety systems list proposed? (i.e. are there any fire safety systems from the statutory fire safety measures list (such as automatic fail-safe devices that should be captured?)

Beyond MEA's scope of expertise.

Proposed Fire Safety Design Framework

Q6. Do you support that PSRs relating to fire safety should only be prepared by licenced fire safety engineers? If not, why?

Yes. This lies within licenced fire safety engineers' area of expertise and prevents too many groups being involved in the PSR phase which would ultimately reduce responsibility and accountability.

Q7. Do you have any concerns with the proposed model for licensing fire-safety engineers? If so, what are they?

MEA advocate for a separate, discrete sub-class of licence for testing, maintenance and replacement of electrical fire safety equipment. We are not advocating for the design aspect to be included in this discrete accreditation sub-class (i.e. electrical systems).

Q8. Do you support using the qualifications and experience currently prescribed by DBP for fire safety engineers? If not, why?

Beyond MEA's scope of expertise.

Active Fire Safety Systems Design

Q9. Do you support that active fire safety designs should be declared by licensed design practitioners? If not, why?

Yes - This lies within design practitioners' area of expertise and prevents too many groups being involved in the PSR phase which would ultimately reduce responsibility and accountability.

Q10. Do you agree with the proposed licence classes and their proposed scope?

MEA advocate that testing and maintenance of already designed and certified systems should have a sub-class for issuing a fire safety statement for a discrete aspect (i.e. exit and emergency lights and electrical smoke alarms) by licensed electricians.

Q11. Should the classes of fire sprinklers, hose reels and hydrants be merged into one fire safety (hydrant class?)

Beyond MEA's scope of expertise.

Q12. Do you support using the same eligibility requirements under the DBP Act for these licence classes? If not, what would you change?

Beyond MEA's scope of expertise.

[Passive Fire Safety Systems Design](#)

Beyond MEA's scope of expertise.

[Holistic Fire Safety Design](#)

Beyond MEA's scope of expertise.



Conclusion

MEA advocate for licenced electrical contractors to be provided the opportunity under NSW's fire regulation accreditation system to test and maintain electrical fire safety equipment (exit and emergency lighting and electrical smoke alarms) under a discrete sub-class of accreditation. The current accreditation system requires electrical contractors to complete extra accreditation competencies, including aspects which are beyond their scope of expertise as electricians.

A discrete sub-class for this specialist work that only licenced electricians can perform will encourage more licenced electrical contractors and their staff to become accredited under NSW's fire safety regulations, creating more resources for building owners to utilise in testing and maintaining their fire safety systems leading to prompter and cheaper testing and maintenance (through market competition) assisting in achieving the overall goal of improving fire safety within NSW buildings.

We look forward to the second consultation phase of NSW's Regulation of Fire Safety Systems.