



20 March 2020

The Hon. Kevin Anderson MP  
Minister for Better Regulation and Innovation  
Parliament House  
Macquarie Street  
Sydney NSW 2000

Dear Minister,

***RE: Impact of Coronavirus on fire safety***

Fire Protection Association Australia (FPA Australia) is the national peak body for fire safety, providing information, services and education to the fire protection industry and the community.

Over the last few days, FPA Australia has received several enquiries about the onset of Coronavirus and its implications for the fire protection industry.

These enquires fall into three groups:

1. Owners or agents of owners preventing practitioners from entering buildings to perform routine service and annual assessment of essential fire safety measures;
2. Employees expressing concerns about their safety when providing services; and
3. Employers are trying to meet their own OHS responsibilities to their staff while at the same time delivering on their commitment to protect the community and meet their contractual obligations.

Although we recognise that owners and managers of buildings are able to determine activities in their own premises, and can determine their own compliance needs, the industry is looking for direction on the Government's expectations at this time.

Most activities can be rearranged to ensure compliance – for example, assessing commercial premises after hours or when the building has lower occupancy levels.

However, the assessment of residential, health care, aged care, education facilities or buildings with designated restrictions is causing concern.

Sole occupancy units (SOUs) pose particular problems for practitioners.

Federal and State Government advice for people to work from home or to undertake self-quarantine means that there is an increased risk to practitioners carrying out assessments, as those who may be affected will be on-site when assessments must be carried out.

This poses a significant health risk to practitioners that are required to access relevant parts of a building (including an occupier's residence) to undertake their normal duties.

Technicians/service contractors are already being denied access to buildings or are being instructed not to access these areas due to implementation of internal company policies to safeguard their employees.

To resolve these concerns, we believe the Government should determine whether it would be acceptable or achievable under current regulations to adopt one of the following courses of action outlined below:

**Option A**

- The Government should issue a declaration that routine maintenance requirements and/or the issue of annual fire safety statements can be delayed up to four (4) months; and
- Routine servicing and fire safety assessment would continue to be carried out on relevant buildings where possible but without entering SOUs or areas of designated restriction.

**Option B**

- The Government should empower local government to grant extensions on the issue of annual fire safety statements for up to four (4) months without incurring a fine; and
- Routine servicing and fire safety assessment would continue to be carried out on relevant buildings where possible but without entering SOUs or areas of designated restriction.

These solutions would ease concerns for practitioners and not expose owners/occupiers to fines for non-compliance when compliance cannot be achieved due to responses to the COVID19 crisis.

Although our preference would be for assessments and maintenance to continue, we need to be alert to the safety concerns of those performing the work.

Delaying the testing or assessment of certain elements within the tolerances identified in relevant standards does not pose a significant safety risk.

Delaying this beyond the tolerance may pose a risk, but we believe a delay at this time would be in line with existing Government advice.

As noted earlier, this would be mostly applied for residential, health care, aged care, education or buildings with designated restrictions.

At this stage we expect maintenance and annual assessment would generally continue on commercial and industrial type facilities.

We would appreciate your advice.

Yours sincerely,



**Nathan Semos**

Chief Technical Officer

Fire Protection Association Australia