

Bills Committee on Fire Services (Amendment) Bill 2015

Written submission of R. S. Howes FRICS, FHKIS, AP/S for

Meeting on 29th February 2016.

Points to be raised from LC Paper No. CB(2)142/15-16(03):

1. The purpose of the Bill is to leverage expertise to provide fire safety risk assessments, however there is no definition of what is to be understood by fire safety, i.e. personal or property, what level is acceptable, if it include fire risk assessment, etc.
2. It appears that fire safety risk assessments in the Paper have a different meaning from overseas and relates only to the present FSD role. If a fire safety risk assessment and certification that only addresses this limited role are issued by a RFE will this mislead the public into assuming the premises or building is “fundamentally safe” with downstream Professional Indemnity Insurance issues.
3. A fire safety risk assessment usually comprises many different facets including construction, materials, hazards and vulnerable persons, with a risk evaluation, a report with an emergency plan, staff training and regular updating. How will the Building Authority’s role in building control be separate from that of the RFE in the license of a use.
4. To achieve fire safety after the fire safety risk assessment of the intended use active and passive measures should be incorporated, these may include, fire detection and warning systems, firefighting installations and dangerous goods storage but also emergency egress and ingress routes, compartmentation, building management,

emergency planning, etc. How will this integrated fire safety be achieved?

5. As the Licensing procedure relates to a continuing use rather than completed building or installation works what is envisaged as the RFE's ongoing responsibility for the premises he has assessed and certified?
6. The present FSD assessment usually only separates a premises into Low, Medium or High Risk with the issue of Standard Requirements for each type. Is this the time to bring in a more comprehensive assessment system such as overseas models of fire safety risk assessment?
7. The types of premises referred to in Annex A cover a wide range of uses in many of which effective Management and emergency procedures are or should be required for a licensed use. How will this be dealt with and should there be a different approach when reviewing, for instance drinking Clubs, residential care premises, open air events and venues, etc
8. Because of the diversity of work a person qualified to undertake a fire risk assessment should not have to be a qualified fire engineer, as stated in para 9 practical experience is required and this can be achieved outside the engineering or fire engineering discipline without the need to re-qualify. In passing it should be noted that fire engineering as we know it today did not exist as an academic subject when older practitoners qualified.