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Thursday 24 March 2016

The Research Director
Legal Affairs and Community Safety Committee
Parliament House
Brisbane, QLD, 4000

To Whom It May Concern,

Submission to the Fire and Emergency Services (Domestic Smoke Alarms) Amendment Bill 2016

This submission is presented by Complied Australia.

Perusing the submissions from other organisations, there are many suggestions that we agree with that need not be re-iterated.

However one very important flaw in the current legislation pertaining to residential homes is the issue of specific smoke alarm placement requirements, or lack thereof.

The current NCC 2016 Vol. 2 fails to require that smoke alarms be installed outside of dead air spaces and away from forced air circulation and lights; these locations that will reduce the performance of the smoke alarm as designed and approved under AS3786, and in many cases based on scientific evidence, rendering the alarm useless.

Adoption of AS 1670.6

Complied Australia suggest a proposal for the adoption and referencing of AS 1670.6, Fire detection, warning, control and intercom systems - System design, installation and commissioning - Smoke alarms, in addition to referencing AS3786 by **Fire and Emergency Services (Smoke Alarms) Amendment Bill 2015**

There are a range of requirements around the location and installation of smoke alarms that need to be considered to ensure that:

1. Smoke detection is provided in egress (exit) paths so that an alarm can be sounded before smoke causes the egress path to become impassable.
2. Smoke alarms are located in a position where smoke will readily reach them – away from wall corners, not inside dead air spaces and not too low when positioned on walls.



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3. Smoke alarms are not installed in locations where they will be subject to nuisance/false alarms (these often result in occupants disabling smoke alarms and therefore removing the protection they provide).
4. Smoke alarms are located to maximise the potential that the audible alarm signal will be heard by occupants (especially in regards to wake sleeping occupants—the highest risk scenario).
5. Smoke alarms are interconnected so that if one goes into alarm (sounds), all go into alarm (sound). Therefore, all occupants may be alerted to a developing fire and can escape before smoke and/or fire cause egress paths to become impassable.

Currently, the BCA and Queensland state legislative requirements for smoke alarms in existing residential buildings do not require all of the above to be provided. A smoke alarm is simply required to be installed. However, it is clear that without being correctly located and installed, smoke alarms will not achieve their purpose.

Currently the **Fire and Emergency Services Act 1990 (Qld) – Section 104RB(2)** references only AS3786.

Complied Australia recommends that AS 1670.6 be referenced in Queensland state legislation to ensure that these important factors are implemented when installing smoke alarms.

For example:

104RB Owner must install smoke alarm

(1) The owner of a domestic dwelling must install smoke alarms in the dwelling in compliance with this section. Maximum penalty—5 penalty units.

(2) Each smoke alarm must comply with AS 3786-1993 and must be installed in accordance with—

(a) for a sole-occupancy unit in a class 2 building—specification E 2.2a, clause 3(c)(i) of the Building Code of Australia; or
(b) for a class 1a building—specification 3.7.2.3 of the Building Code of Australia

and

(c) AS1670.6.

This will help ensure smoke alarms achieve their purpose of detecting a fire in its initial development stage and provide early warning of the fire to allow occupants time to escape and also thereby address the concerns of this inquiry about smoke and fire related injuries and deaths (and associated property damage).

The adoption of AS 1670.6 is considered the most appropriate solution to this problem.

Kind regards

Complied Australia