

DFS(3)-04-08 (p4)

4th April 2008

Huw Lewis AM, Chair Proposed Domestic Fire Safety LCO Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

Dear Mr Lewis,

Thank you for your letter of 19th March, inviting the European Fire Sprinkler Network, EFSN, to submit evidence to the Committee. I am replying on behalf of the EFSN. I am prepared to give oral evidence and have already arranged to do so on 22nd April at 10:00.

Regarding the general principle that legislative competence in the area identified in Matter 11.1 be conferred on the Assembly, I suggest that this is a good idea. Fire safety is a local concern and it is entirely appropriate for Wales to be able to determine the measures necessary to achieve its own fire safety goals, in this case greatly improved fire safety through the fitting of sprinklers. Wales could be the first jurisdiction in Europe to take this step but several other jurisdictions, some more local such as Glasgow and others also national such as Finland, are considering whether to require sprinklers in new housing. Cities and jurisdictions in North America that require sprinklers in all new housing have lower fire death rates than in Wales or anywhere else in the United Kingdom.

I believe that it is the intention that the proposed Order will lead to all new housing in Wales being fitted with sprinklers. That is laudable. I am not a lawyer and not able to comment on whether the wording will achieve that result. However, I am not sure that it would lead to sprinklers being installed in care premises, such as homes for the elderly or those with disabilities. These people are at more risk in a fire than others and it would be an opportunity missed if sprinklers were not also installed in housing for them. In fact fitting sprinklers in all new housing would make many more buildings safe from fire for the elderly and disabled, helping them to live more independent lives. The Explanatory Memorandum mentions fire death statistics from NFPA in the United States. NFPA also found that fire death rates were over 80% lower in care homes fitted with sprinklers.

It is necessary to set out the meaning of 'new residential premises' and sprinkler system in the proposed Order. I recommend a clarification that this includes single family houses, since in some minds there is a distinction made between single family houses and residential buildings such as blocks of flats which house more than one family. It is helpful to clarify what is meant by a sprinkler system and to refer to the current relevant standard, so that over-design and more importantly under-design are avoided. Over time the standard may be revised as new technology becomes available and I believe that the Order would not prevent the use of future editions of BS 9251.

The Order is an excellent initiative and will lead to a significant reduction in fire deaths in Wales, making Wales an example to the rest of Europe.

Yours sincerely,

Alan Brinson
Executive Director
European Fire Sprinkler Network