Consultation on fire safety proposals

**May 2017**

SUBMISSION FORM

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This form sets out the consultation questions corresponding to the proposals in *Consultation on fire safety proposals* (the consultation document).

**Instructions for use**

Please refer to the consultation document for full details on making a submission.

The questions in this form are indicative only and are not intended to limit your response to the issues in the consultation document. You do not have to use this form to make your submission.

Please return your submission by one of the following methods:

* emailing your feedback to [firereview@mbie.govt.nz](mailto:firereview@mbie.govt.nz), with ‘Consultation on fire safety proposals’ in the subject line
* posting or couriering your feedback to:

Ministry of Business, Innovation and Employment

15 Stout Street

PO Box 1473

Wellington 6140

***Attention: Consultation on fire safety proposals***

* Please include your contact details.

If you are using this form to make your submission, please provide your contact details below:

| Name  (include name of organisation if you are submitting on behalf of an organisation) | Contact details |
| --- | --- |
|  |  |
| Additional information about your organisation (optional) | |
|  | |

**Proposal 1: Make the Building Code less prescriptive for internal surface finishes**

See pages 10 – 12 of the attached consultation document

| Question 1.1 Do you agree with the proposal to move the prescriptive requirements out of Code clause C3.4? If not, why not? |
| --- |
| *[Insert response here]* |
| Question 1.2 Do you agree with the proposed wording for this clause? If not, why not and what would you suggest? |
| *[Insert response here]* |
| Question 1.3 Do you agree with the proposed definition of ‘internal surface finshes’? If not, why not? |
| *[Insert response here]* |
| Question 1.4 Do you agree with the revised list of exemptions to the ‘internal surface finishes’? If not, what would you suggest? |
| *[Insert response here]* |
| Question 1.5 Do you agree with the definition of ‘place of assembly’? If not, what changes would you suggest? |
| *[Insert response here]* |
| Question 1.6 Do you agree with the proposed changes to internal surface finish requirements as set out in Table 4.1? If not, why not? |
| *[Insert response here]* |
| Question 1.7 Are there any other changes you suggest to the internal surface finish requirements set out in Table 4.1? If so, please give your reasons. |
| *[Insert response here]* |
| Question 1.8 Do you agree with the proposed changes to Design scenario (IS): Rapid fire spread involving internal surface finishes? If not, why not? |
| *[Insert response here]* |
| Question 1.9 Is there anything else you suggest adding to or changing in Design scenario (IS)? Please give your reasons. |
| *[Insert response here]* |
| Question 1.10 Do you agree with moving the requirements for pipes and ducts to Acceptable Solutions C/AS2-7 and Verification Method C/VM2? If not, why not? |
| *[Insert response here]* |
| Question 1.11 Do you have any suggested changes to the proposal to move pipes and ducts to C/AS2-7 and C/VM2? |
| *[Insert response here]* |
| Question 1.12 Do you agree with the proposal to add specified performances for typical finishes to the Verification Method? If not, why not? |
| *[Insert response here]* |
| Question 1.13 Do you agree with introducing alternative fire tests for testing critical radiant flux for flooring? If not, why not? |
| *[Insert response here]* |
| Question 1.14 Are there any changes you would suggest to the proposal to introduce new alternatives for testing critical radiant flux for flooring? Please give your reasons. |
| *[Insert response here]* |
| Any other comments on Proposal 1? |
| *[Insert response here]* |

**Proposal 2: Clarify Building Code requirements for structural performance in fire**

See pages 13 – 15 of the attached consultation document

| Question 2.1 Do you agree with the proposed changes to Building Code clause C6? Why, or why not? |
| --- |
| *[Insert response here]* |
| Question 2.2 Do you think the term ‘structural performance’ is sufficiently well understood by structural engineers and fire engineers or should this be defined in Building Code clause A2? | |
| *[Insert response here]* | |
| Question 2.3 Do you agree with the proposed definition updates for ‘fire resistance rating (FRR)’ and ‘primary element’ in Building Code clause A2? Why or why not? | |
| *[Insert response here]* | |
| Question 2.4 Do you have any feedback on the proposed definitions listed in question 2.3? If so, please provide. | |
| *[Insert response here]* | |
| Question 2.5 In your view, are the proposed loadings in B1/VM1 adequate? Why or why not? If not, what would you propose? | |
| *[Insert response here]* | |
| Question 2.6 Do you agree with the proposed changes to C/AS2-C/AS6 regarding performance of structures affected by fire? Why, or why not? | |
| *[Insert response here]* | |
| Question 2.7 In C/AS2-C/AS6 the requirements for the performance of structures affected by fire are not exclusive to Part 4 ‘Control of internal fire and smoke spread’. Is section 4.3 as proposed above more appropriately located in a new Part 8 rather than in Part 4? If so, why? Alternatively, a simple clause could be added to Part 5 referring to the proposed requirements in section 4.3. If not, why not? | |
| *[Insert response here]* | |
| Question 2.8 Do you agree with the proposed addition to C/AS1 to clarify that the lateral load requirements in B1/VM1 do not apply? Why, or why not? | |
| *[Insert response here]* | |
| Question 2.9 Do you agree that the loads in Paragraph 2.2.4 in B1/VM1 do not need to be highlighted in C/AS7 (buildings used for vehicle storage and parking) or C/VM2, or should these loading requirements be added to these documents? If so, why? | |
| *[Insert response here]* | |
| Question 2.10 Do you agree with the proposed amendments to the definitions of ‘primary element’ and ‘structural adequacy’ in these Acceptable Solutions? If not, why not? | |
| *[Insert response here]* | |
| Any other comments on Proposal 2? | | |
| *[Insert response here]* | | |

**Proposal 3: Update the Verification Method and include for safeguards for tall buildings**

See page 16 - 19 of the attached consultation document

| Question 3.1 Do you agree with the revisions to clarify the compliance with the Building Code of this Verification Method? If not, why not? | |
| --- | --- |
| *[Insert response here]* | |
| Question 3.2 Do you agree with the clarification of scope of the Verification Method for managed buildings? If not, why not? | |
| *[Insert response here]* | |
| Question 3.3 Do you agree with the proposed FLED changes for tall buildings in Table 2.3? If not, why not? | |
| *[Insert response here]* | |
| Question 3.4 Do you agree with the removal of ‘dependable deformation’ in the table? If not, why not? | |
| *[Insert response here]* | |
| Questions 3.5 Do you agree with the cap of 120 minutes FRR on strucutural fire rating? If not, why not? | |
| *[Insert response here]* | |
| Question 3.6 Do you agree with addressing the whole building escape within the stairwells? If not, why not? | |
| *[Insert response here]* | |
| Question 3.7 Do you agree to the proposed requirements for phased evacuation? If not, why not? | |
| *[Insert response here]* | |
| Question 3.8 Do you agree with the change to travel speed from 1.2 m/s to 0.6 m/s for less mobile occupants? If not, why not? | |
| *[Insert response here]* | |
| Question 3.1 Do you agree with the revisions to clarify the compliance with the Building Code of this Verification Method? If not, why not? | |
| *[Insert response here]* | |
| Question 3.2 Do you agree with the clarification of scope of the Verification Method for managed buildings? If not, why not? | |
| *[Insert response here]* | |
| Question 3.3 Do you agree with the proposed FLED changes for tall buildings in Table 2.3? If not, why not? | |
| *[Insert response here]* | |
| Question 3.4 Do you agree with the removal of ‘dependable deformation’ in the table? If not, why not? | |
| *[Insert response here]* | |
| Questions 3.5 Do you agree with the cap of 120 minutes FRR on structural fire rating? If not, why not? | |
| *[Insert response here]* | |
| Question 3.6 Do you agree with addressing the whole building escape within the stairwells? If not, why not? | |
| *[Insert response here]* | |
| Question 3.7 Do you agree to the proposed requirements for phased evacuation? If not, why not? | |
| *[Insert response here]* | |
| Question 3.8 Do you agree with the change to travel speed from 1.2 m/s to 0.6 m/s for less mobile occupants? If not, why not? | |
| *[Insert response here]* | |
| Question 3.9 Do you agree with the changes to Design scenario (BE): Fire blocks exit? If not, why not? | |
| *[Insert response here]* | |
| Question 3.10 Do you agree with the proposal to allow design fire sizes using FLED without limiting storage height in Design scenario (HS)? If not, why not? | |
| *[Insert response here]* | |
| Question 3.11 Do you agree with the new requirements to control combustibility for external cladding systems in tall buildings? If not, why not? | |
| *[Insert response here]* | |
| Question 3.12 Do you agree with the other changes proposed to this scenario? If not, why not? | |
| *[Insert response here]* | |
| Question 3.13 Do you agree to the proposed changes to lower roofs for protection of other property? If not, why not? | |
| *[Insert response here]* | |
| Question 3.14 Do you agree with the changes relating to external cladding for vertical fire spread? If not, why not? | |
| *[Insert response here]* | |
| Question 3.15 Do you agree to the proposed changes to the C/VM2 scenario description for Design scenario (FO):Firefighting operations for tall buildings? If not, why not? | |
| *[Insert response here]* | |
| Question 3.16 Do you agree with the changes to Design scenario (CF): Challenging fire for single escape routes? If not, why not? | |
| *[Insert response here]* | |
| Question 3.17 Do you agree with the changes to Design scenario (CF): Challenging fire for escape for large occupancies? If not, why not? | |
| *[Insert response here]* | |
| Question 3.18 Do you agree with the changes to Design scenario (CF): Challenging fire for areas of special fire risk? If not, why not? | |
| *[Insert response here]* | |
| Question 3.19 Do you agree with the proposed changes to Design scenario (RC): Robustness check to provide more reliable fire safety systems for tall buildings? If not, why not? | |
| *[Insert response here]* | |
| Question 3.20 Do you agree with the criteria for cladding systems as outlined in the new Appendix C? If not, why not? | |
| *[Insert response here]* | |
| Any other comments on Proposal 3? |
| *[Insert response here]* |

**Proposal 4: Support alternative solutions for fire design**

See page 20 of the attached consultation document

| Question 4.1 Do you agree with the framework for alternative solutions proposed in the draft guidance for alternative solutions for protection from fire? If not, why not? | |
| --- | --- |
| *[Insert response here]* | |
| Question 4.2 Does the guidance adequately cover the main topics for alternative solutions? If not, what else would you include? | |
| *[Insert response here]* | |
| Question 4.3 Does the guidance provide sufficient information to enable you to formulate an alternative solution? If not, what other information would you include? | |
| *[Insert response here]* | |
| Question 4.4 Do you agree with the proposed levels of expertise to undertake alternative solutions? If not, why not? | |
| *[Insert response here]* | |
| Any other comments on Proposal 4? |
| *[Insert response here]* |