

Legislation Committee No.1

Response to the consultation on the Proposed Domestic Fire Safety (Wales) Measure

Firebrake Wales

Firebrake Wales generally welcomes this proposed Measure - as the stated aim of the Measure ('to reduce the incidence of death and injury from fires in newly created residences in Wales') is so closely aligned to the charity's own mission. As the national fire safety charity for Wales, we believe that human behaviour, attitudes, circumstances and conditions are significant drivers in residential fire incidence, injuries and fatalities. As such, we believe these fires are better termed 'preventable' rather than 'accidental' - and prevention is better than cure.

The charity does not feel best-placed to provide evidence on the specific provisions contained within the proposed Measure or the practical implications involved in the implementation of the Measure. However we welcome this opportunity to make the following general comments in relation to this Measure:

- Whilst the existing evidence points to, amongst other savings, the potential life-saving benefit of such automated suppression systems - we would advise against seeing this alone as a 'panacea' for preventative fire safety in any residence in which it may be installed. This technical solution operates only once a fire has started - as most accidental fires in the home are directly linked to some element of human behaviour, then education, awareness and advice can all help in preventing fires from actually starting in the first place.
- **Maintenance:** The Measure contains a requirement for the provision of an effectively operating automatic fire suppression system in each qualifying residence. We know from our experiences of the various programmes to encourage/install smoke detectors in domestic properties that only correctly functioning 'hardware' has the potential to save lives. The responsibility for the ongoing maintenance of the systems outlined in this proposed Measure is therefore an important consideration (though it falls outside of the Measure itself).
- We know that the risk of fire is not evenly distributed throughout Wales and that some people are more vulnerable to a fire in their home due to their circumstances, conditions or behaviours. Ideally we would suggest that the installation of automated suppression systems (as well as other fire safety measures) be targeted according to these known risk factors. However, we understand the practical limitations/restrictions involved in such a 'retro-fitting' programme

and welcome the proposed Measure (for new residential premises) as a good and practical starting point.