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6 August 2015

Committee Secretary  
Senate Legal and Constitutional Affairs Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Committee Secretary

Re: Senate inquiry into the use of smoke alarms to prevent smoke and fire related deaths

Standards Australia welcomes the opportunity to provide a submission to the Senate inquiry into the use of smoke alarms to prevent smoke and fire related deaths.

Our response to the terms of reference is limited to matters of relevance to us as Australia's peak standards development body and our role in Australia's standards and conformance infrastructure.

#### The process for the development and maintenance of Australian Standards Australia

Australian Standards are developed through a process of consensus, aligned with Australia's obligations Under the World Trade Organization Technical Barriers to Trade (WTO TBT) Agreement and the good practice regulatory frameworks of the Commonwealth and all States and Territories. In addition, with respect to Australian Standards developed for referencing in the National Construction Code (NCC), Standards Australia and the Australian Building Codes Board maintain a Memorandum of Understanding with respect to the development of NCC Referenced Documents.

Standards Australia maintains an open process for the proposal of new Australian Standards and for the amendment, revision and withdrawal of existing Australian Standards which require:

- A clear scope;
- A Net Benefit case (demonstrating Net Benefit to the Australian Community of a project being undertaken);
- Broad stakeholder support from relevant industry, community and government stakeholders.

In addition, through the standards development process, a minimum period of 9 weeks public comment for new and revised Australian Standards is required as is a formal voting ballot period which must demonstrate consensus in accordance with our Standardisation Guides.

### The regulatory framework for safety measures in the building industry

Standards Australia works closely with Australian governments, the Australian Building Codes Board (ABCB) and stakeholders from the industry and community to develop consensus-based Standards related to building and construction, including safety measures.

It is important to recognise that public policy matters are addressed by the National Construction Code, and technical solutions to meet the public policy objectives are developed through the consensus based Standards Australia process to the extent that governments choose to call up or 'reference' Australian Standards.

### Smoke alarm standards in Australia

Standards Australia maintains a constituted technical committee FP-002 Fire Detection, Warning, Control and Intercom Systems.

FP-002 members represent:

Association of Hydraulic Services Consultants Australia  
Australasian Fire and Emergency Service Authorities Council  
Australian Building Codes Board  
Australian Chamber of Commerce and Industry  
Australian Electrical and Electronic Manufacturers Association  
Australian Industry Group  
Australian Institute of Building Surveyors  
CSIRO  
Deafness Forum of Australia  
Department of Defence (Australian Government)  
Department of Human Services (VIC)  
Engineers Australia  
Fire Protection Association Australia  
National Electrical and Communications Association  
National Fire Industry Association  
Property Council of Australia  
Society of Fire Safety

In July 1991 the Victorian Government introduced a mandatory requirement for the installation of smoke alarms in new dwellings. The development and publishing of AS3786 – 1993 *Smoke alarms using scattered light, transmitted light or ionization* was in response to this regulatory change.

AS 3786-1993 provided for both photoelectric and ionisation technologies. This allowed the system installer to choose the technology most suited to the application and building layout. Since being published in 1993 four amendments have been made to the standard:

- Amendment 1, April 1994; addressed the introduction of a requirement for a 10 year service life for smoke alarms as well as the requirement for a battery missing indication and the introduction of mains powered products using rechargeable batteries.
- Amendment 2, December 1995: addressed the introduction of products with a 10 year non removable battery.
- Amendment 3, November 2001: introduced requirements for additional safety measures where non rechargeable lithium batteries were used as the secondary power source for mains powered smoke alarms (Safety issue). Also introduced the requirement for a disconnect facility for 10 year products to enable serviceability.
- Amendment 4, April 2004: Introduced a reference to the ISO warning tones.

These amendments reflect the views and the consensus position of stakeholders, not those of Standards Australia.

In alignment with Standards Australia's commitment to international harmonisation, a proposal was put forward to adopt a modified version of ISO12239 *Smoke alarms using scattered light, transmitted light or ionization*. The objective of this adoption was to ensure that Australian standards accounted for innovations in smoke alarm technology.

This project was completed in February 2015 and a revised version of AS3786 was published. Whilst not a direct adoption of the international standard, AS3786:2015 is based upon it. As with the previous version of AS3786 both the photoelectric and ionisation technologies are addressed within the standard.

Any further changes to this standard will be considered in a similar manner and will be subjected to a rigorous and transparent process.

Yours sincerely

Tim Wheeler  
National Sector Manager  
Standards Australia



### About Standards Australia

Standards Australia is an independent, non-government, not-for-profit, member-based, standards development organisation. Our members include the Commonwealth, State and Territory governments, peak industry associations and community groups.

We are recognised by the Commonwealth as Australia's peak non-government standards development body. We are Australia's member of the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC).

Standards Australia develops Standards through a rigorous and transparent process. To develop these standards, we form technical committees that have a balanced representation across all stakeholder groups. All Standards are based on consensus and go through a period of public comment before publication.