

11 October 2017

To: [BuildingRegulationsandFireSafetyReview@communities.gsi.gov.uk](mailto:BuildingRegulationsandFireSafetyReview@communities.gsi.gov.uk)

Sirs / Madam

The Smoke Control Association (SCA) welcomes the imminent independent review of Building Regulations and Fire Safety and offers its support and assistance to the review body.

In particular, we call for more control and regulation of smoke control design, to ensure that safety is not compromised in the design and installation of these systems and that the standard of life safety in our buildings is improved in accordance with the latest research and development

The benefits of comprehensive fire safety in buildings are well proven, particularly with a clear objective centred on life safety. There is a wealth of data on the interconnection between passive and active systems, both of which have a part to play in the event of a fire, but no one solution is completely stand-alone and the interaction between them is critically important.

Sprinklers and suppression systems have received a lot of coverage over recent months, but it should also be remembered that the suppression systems are not guaranteed to extinguish the fire and their primary objective is to suppress and control the fire to the boundaries of passive protection. They have little or no benefit in improving visibility or removing hot toxic smoke from the building, which is of course critical when a building needs to be evacuated.

Likewise, smoke control systems are generally designed to keep escape routes clear of smoke to aid evacuation and assist fire fighters by keeping access and evacuation routes relatively clear.

The recommendations of the Building Regulations, in the form of Approved Document B (ADB), are currently vague and rarely followed precisely. The lack of regular reviews of ADB means that new techniques and technologies developed by industries such as our own, which improve the safety of our buildings are often overlooked. Significant product and design standards are available now but they are frustratingly being ignored due to the infrequency of the review process.

In spite of this, the Smoke Control Association has, to a large extent, been able to self-regulate the industry through the evolution of new techniques and influencing adoption of standards, both British and European.

However, this is not ideal - there are always exceptions to the rule – for example, when contractors and designers outside of the main sphere of specialist practitioners, attempt to enter the market with little understanding of the rigors to which life safety systems should be designed and installed, this can lead to problems longer term.

We firmly believe that to fully exploit the benefits of smoke control systems for the benefit of the building occupants, the industry needs more definition from our regulations, so that installations are at least starting from the same point, with mandatory objectives and equipment that is designed and tested to standards that are themselves relevant to the application.

In addition we particularly hope that the review of ADB clearly defines levels of competence necessary to ensure that designers, installers, commissioning engineers and maintenance contractors have suitable knowledge and training to deliver fully functioning life safety smoke control systems. These need to be designed, installed, tested and maintained to a standard

that is not compromised by commercial pressures to value engineer to the lowest possible level.

The Government's approach to other industries, such as electrical safety, creating a link between regulation, practitioner certification backed by mandatory requirements is ideal and we would urge a similar approach is adopted for fire safety in buildings.

We offer our support, knowledge and expertise of our members during the review of ADB and any future developments of ADB.

Yours sincerely,

David Mowatt  
Director Lareine Engineering  
Chairman Smoke Control Association

Attch: List of supporting SCA members

# List of supporting SCA members

---

(also available on [www.feta.co.uk/associations/hevac/specialist-groups/sca-members](http://www.feta.co.uk/associations/hevac/specialist-groups/sca-members))

Actionair (Swegon Air Management)  
Advanced Air (UK) Ltd  
Advanced Smoke Group Ltd  
Airvent System Services Ltd / Brakel Airvent  
Axair Fans UK Ltd  
Belimo Automation UK Ltd  
Bilco UK Ltd  
Brakel UK  
BSB Engineering Services Ltd  
Colt International Ltd  
Crossflow Airconditioning Ltd  
Delta Ventilation Ltd  
Dyer Environmental Controls Ltd  
Elta Fans Ltd  
Fan Systems Group Ltd  
Fire And Smoke Solutions Ltd  
Fire Bright Solutions Limited  
Fire Design Solutions Limited  
Fire Engineering Associates Ltd  
Flakt Woods Limited  
GEZE UK Ltd  
Gilberts (Blackpool) Ltd  
Helios Ventilation Systems Ltd  
Lareine Engineering Limited  
London Fan Co Ltd  
Nationwide Specialist Projects Ltd  
Nuair Ltd  
Powrmatic Ltd  
S&P UK Ventilation Systems Ltd  
SE Controls  
Smoke Control Dampers Ltd  
Smoke Control Services Ltd (SCS Group)  
Smoke Control Solutions Ltd  
Smoke Management Systems Limited  
Tri-Air Innovations Ltd  
TROX UK Ltd  
Vectaire (Air Vent Technology Ltd)  
Vectaire Ltd  
Vent Ltd (Vent Mechanical)  
Vent-Axia Ltd  
WEG Electric Motors (U.K.) Ltd