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ONTARIO PROFESSIONAL FIRE FIGHTERS ASSOCIATION

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2008 Building Code Consultation
c/o Building and Development Branch
Ministry of Municipal Affairs and Housing
777 Bay Street – 2nd Floor
Toronto, ON
M5G 2E5

OPFFA Comments - Residential Fire Sprinklers A Consultation on Proposed Changes to Ontario's Building Code

Dear Minister Watson:

I am writing on behalf of the over 10,000 members of the Ontario Professional Fire Fighters Association (OPFFA). The OPFFA is an Association which represents professional full-time fire fighters across Ontario. Our membership is made up of front-line emergency responders, fire prevention, inspection and investigation personnel, training officers, emergency communicators, and mechanical and maintenance individuals who all share the goal of making Ontario's fire service the best it can be.

The OPFFA has and will continue to advocate for the improvement of fire service delivery to the citizens of Ontario and the enhancement of the health and safety of our members.

The Ontario's government's proposed amendments to the Ontario Building Code (Code) with respect to mandating fire sprinkler systems is a good step in keeping with our aforementioned goal. However, we do have some concerns with the proposed amendments as written and discussed during the recent consultations.

The OPFFA supports any initiative that will increase public and fire fighter safety. While the installation of automatic sprinkler systems is a proven method for reducing loss of life and property due to fire, to be truly effective these systems must be installed and maintained properly.



It is therefore the position of the OPFFA that any legislation mandating fire sprinkler installation in residential units must contain provisions that ensure that such systems are designed by licensed or accredited professionals and installed and maintained by licensed fire sprinkler contractors. Such provisions were noticeably absent from the proposed amendments and should be seriously considered as a critical element given the nature and intended purpose of sprinkler systems as a life safety device.

Further, the OPFFA views the mandating of sprinkler systems as an improvement to existing code requirements *not* a replacement. The flexibility introduced into the building code greatly concerns the OPFFA.

We recognize that builders may interpret the installation of sprinklers without providing concessions on current requirements as ‘regulation over-kill’. However, to offer concessions in our opinion will certainly guarantee the elimination of reliable building standards designed to reduce fire spread by compartmentalization. The shift away from requirements such as masonry and concrete firewall construction forces the occupants and the responding fire service to rely upon a mechanical system whereby, as with any mechanical system, there are sure to be failures. Any such malfunction to a system combined with building concessions on the front-end leaves all of us in a much more vulnerable situation than prior to these proposed amendments which are intended to improve public and fire fighter safety.

It is therefore the position of the OPFFA that the mandating of fire sprinkler systems should only compliment current requirements and that concessions should not be considered within the code in exchange for the installation of sprinklers.

On a final note, an overriding concern to our members is the perception by some that the installation of sprinklers (albeit this perception is more focused on mandating full residential sprinklers rather than what is being proposed) will reduce the need for front-line fire fighters.

The OPFFA would like to be on record with the following; while the installation of fire sprinkler systems in residential buildings will enhance public safety in Ontario it must be recognized that residential fire sprinklers are no substitute, in whole or in part, for a properly staffed fire service (4 fire fighters per responding apparatus), arriving on scene of an emergency within recognized response standards.

We appreciate the government’s efforts to improve both public and fire fighter safety but we caution that this approach requires further consideration. We would be pleased to meet and discuss our position(s) in further detail should you desire.

Thank you for the opportunity to provide this input.

Respectfully,

A handwritten signature in black ink, appearing to read 'Fred LeBlanc', written over the word 'Respectfully,'.

Fred LeBlanc,
President

Cc: The Hon. Jim Watson, Minister of Municipal Affairs and Housing
The Hon. Rick Bartolucci, Minister of Community Safety and Correctional
Services