

**COVID 19 and Periodic and Annual Service/Maintenance
of
Fire Detection and Alarm (FDAS) and Emergency Lighting (EML)
Life Safety Systems**

I have had a number of queries regarding the above and while I stress that this is not a legal opinion, the following is my professional opinion based on my understanding of the Standards and other legislation.

General Observations:

Firstly, COVID 19 is transient. While it is incredibly brutal, deadly and disruptive, we will emerge at the end, pick up the pieces and revert to normality. In my opinion, we must have this as a mind-set.

Also, with this in mind, we must endeavor to return to safe and functional facilities. We can only achieve this by Maintaining and Servicing our Life Safety systems.

There is no question that we must understand that a degree of flexibility is needed at this time. In fact, the Standards recognise this and at the end of the day require that the 'intent' outweighs the 'literal interpretation' of these documents.

The Duty-holders (the 'User', 'Owner', Responsible Person', 'Manager'. etc.) still retain their obligations in respect of their duty-of-care under the Health & Safety and other legislation. This virus does not change or reduce these duties or obligations.

As I believe must be recognised by all, the present conditions will make full adherence to requirements more difficult, and perhaps require risk assessment and specific engineered solutions in respect of the ability to comply with the intent of some required procedures or actions.

There are always suitable alternatives if we look for them!

Users need to be made aware of the daily, weekly, periodic and annual inspections/tests they are obliged to carry out under the Irish Standards, in order to keep their FDAS and EML installations properly functional.

Consultants, Contractors and Service Providers can assist here by providing our clients with appropriate advice. This is an excellent opportunity to show that we help our Clients with their FDAS and EML system servicing and assist with professional and practical service with, and for, them

FDAS and EML Service and Maintenance:

Both FDAS and EML are Life Safety Systems (LSS). As such there is no basis for the argument that a holiday, strike, or even the absence of staff from a facility, can be used as a justifiable reason for not carrying out periodic or annual maintenance and servicing.

In my opinion, COVID 19 does not change this obligation

Both systems (FDAS and EML) require User and (generally) third-party servicing.

User servicing: Daily and Weekly:

- Applies to both FDAS and EML
- Even more important now for 'lock-down' premises.

Periodic/Annual (P/A) Servicing:

- FDAS: Other than for non-domestic, small premises, requires 4 visits annually for all installations
- EML: Requires 4 visits annually for all installations

Service Flexibility:

- The fact that the FDAS and EML standards both allow a 2-month window for the next due service, will allow considerable flexibility here.
- Service and Testing can be carried out during weekend or periods of reduced or non-occupancy or in designated areas only or in other ways.
- Unless this virus persists for a long time, the period that it will affect our servicing should be hopefully no more than once or twice during this emergency period.
- Flexibility of Service Providers and Users alike is of paramount importance

Re-occupation:

Premises where Life Safety Systems are not serviced could be deemed to be unsafe for re-occupation. This could be under:

- Health & Safety Legislation
- Fire Service Act
- Occupier Liability and other statutory obligations
- Insurance

Where a premises has not been periodically/annually serviced (FDAS and/or EML, an element of recommissioning might be necessary to allow sign-off following this problem period:

- This might be for operational or corporate compliance
- Impact on Health & Safety would have to be reviewed
- It might also be related to insurances

If required, it could be expensive and also could result in delayed re-occupation.

Insurances:

There could be issues regarding insurance cover should essential maintenance and servicing of systems, including FDAS and EML, have not been carried out.

Service and Maintenance in different classes of premises:

Non-‘locked-down’ premises:

There will still be staff in many of these premises, perhaps for reduced operation; services; security; maintenance; or other purposes.

In this regard, normal FDAS and EML servicing remains essential and should not be difficult to schedule.

There may even be a justifiable argument that this could be an opportunity to carry out amendments or even upgrades at a time when premises are assessable and system (FDAS and EML) works can safely be carried out safety and in a manner compliant with government and health directives:

- I personally feel that anything we can do to safely maintain some economic activity, is essential at this time.
- REV01: The Government restrictions announced on Friday 27th essentially put this suggestion on hold until such works are permitted

‘Locked-down’ premises:

These facilities will include all healthcare facilities

The fact that these facilities will be in full (if not overloaded) occupancy, makes LSS periodic and annual servicing even more critical

Normal Servicing will be difficult but is not impossible. A degree of flexibility will also need to be taken into account.

Fire Detection and Alarm Systems: (FDAS)

- FDAS Panels are located adjacent to main entrances. These can have core periodic checks quite easily. These premises must have personnel entering and leaving and so appropriate procedures will be in place for this.
- With the Users assistance, the operational ability of the installation can be verified without the Service Provided leaving the panel position.
- The use of the ‘evacuation’ switch for a couple of seconds (with Staff appropriately forewarned, may be possibly.
- Testing in certain areas such as plant rooms or the Reception areas where the panel is located, could be considered. With some thought, planning and cooperation with the User, adequate Servicing should be possible.

Emergency Lighting Systems: (EML)

- User assistance and cooperation will be essential here as EML is also throughout the premises but often has no central control facility.

- Distribution Boards are often in central locations and corridors. As such access using appropriate Protective Clothing will be possible in many cases to initiate Tests.
- I expect that virtually all such premises will have in-house maintenance personnel. Such persons could be easily trained to work with the external Service Providers and test systems both functionally and for full duration. Remember that ALL compliant systems can be tested without affecting the normal lighting.
- Users staff (maintenance or service) could carry out the actual 'during-and-after' inspections.

Finally, reverting to my initial optimistic attitude that we will revert to normality, this cloud could have a (very tarnished, dull,...) silver lining. At this time can we use this (abiding to all travel, etc. restrictions), to carry out repairs or upgrades to FDAS and EML, where premises are unoccupied or only sparingly occupied.

REV 01: again refer to the note above re Government restrictions on construction activities

Could this help a few to keep earning a living; make improvements to LSS that are easier to carry out at this time; and maybe act as a little positivity where everything else is so bleak?

I wish all of you the best and stay safe.

As always, feel free to email queries

Regards



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Member of the following NSAI Standards Working Groups:
I.S.3218 - Fire Detection and Alarm Systems for 16 years
I.S.3217 - Emergency Lighting for 10 years