

**SUBMISSION TO DEPARTMENT OF HOUSING AND PUBLIC
WORKS**

**SUBMISSION ON THE WSP INTERIM FIRE ENGINEERING REPORT FOR
THE QUEENSLAND DEVELOPMENT CODE PART 3.7**

2ND MARCH 2015

Queensland Farmers' Federation (QFF) is the peak body representing and uniting 15 of Queensland's rural industry organisations who work on behalf of primary producers across the state. QFF's mission is to secure a sustainable future for Queensland primary producers within a favourable social, economic and political environment by representing the common interests of its member organisations'. QFF's core business centres on resource security; water resources; environment and natural resources; industry development; economics; quarantine and trade.

Our goal is to secure a sustainable and profitable future for our members, as a core growth sector of the economy. Our members include:

- CANEGROWERS,
- Cotton Australia,
- Growcom,
- Nursery and Garden Industry Queensland,
- Queensland Aquaculture Industries Federation,
- Queensland Chicken Growers Association,
- Queensland Dairyfarmers' Organisation,
- Queensland Chicken Meat Council,
- Queensland United Egg Producers,
- Flower Association of Queensland Inc.,
- Pork Queensland Inc.,
- Australian Organic
- Pioneer Valley Water Co-operative Limited,
- Central Downs Irrigators Limited, and
- Burdekin River Irrigators Area Committee

The Queensland Farmers Federation and its members thank the department for the opportunity to provide feedback on the WSP Interim Fire Engineering Report.

We would like to note that this joint submission does not represent the views of Growcom who have decided to abstain from the joint submission at this point. The horticulture industry often have quite high human occupancy in their sheds so many of the comments are not relevant and Growcom was not able to provide industry specific feedback on such technical subject at short notice. Additionally we would note that this submission is provided without prejudice to any subsequent or additional views expressed by our members.

We would encourage the department to keep in mind that the majority of farm buildings present a low risk to life in terms of fire safety.

If you have any questions regarding our comments please don't hesitate to contact us.

A1 Compartment and Separation

The QFF would support the position taken in the Draft QDC Code. There is a number of structures within the industry, for example poly tunnels and shade houses for nurseries and horticulture which could be built with limited separation distances to make more efficient use of available land. Similarly for intensive animal industries where clusters of buildings are present there may also be need to reduce the footprint to meet appropriate separation distances in relation to neighbours. There is nothing to suggest that this will increase the risk to life safety given the risk for an individual building is extremely low.

A2 Smoke Hazard management

We do not have the expertise to comment on the technical aspects of this section. A large number of rural buildings would have a relatively low ceiling/roof height but again taking into account occupancy time, the risk to life safety is extremely low. See A3 on response to travel time.

A3 Access and Egress

We would support the Codes position with respect to travel distances. While WSP have provided data regarding travel time, it does not take into account the low occupancy rate and hence the very low risk to life safety.

Additional and potentially unnecessary openings and doorways in the sides of some types of shedding can present structural and operational problems. We would caution the need to increase exit points.

A4 Firefighting equipment

The QFF would like to indicate support for WSP's position on fire extinguisher types. Specification within the code will be necessary to identify types of extinguishers and if they are fit for use within a certain building type. Powder based units are likely to be more widely used due to their ability to fight many ignition types and to hold pressure, unlike carbon dioxide extinguishers.

A5 Firefighting equipment – Fire Hydrants and water supply.

The QFF would support the WSP position in regard to storage levels and required distance from sheds. In the poultry industry sheds are typically at least 150 metres

long and in clusters of up to 10 sheds. It would be very difficult to comply with the Code if each shed was expected to have firefighting infrastructure, which would also come at considerable cost to producers.

Additionally the QFF is of the view that the fire brigade response time factor should be reduced to 20 minutes. As WSP have stated, generally there would be little left of the structure by the time the brigade arrived. Under the current draft Code this would further reduce the impact of having to provide on farm water storage or hydrants.

A6, A7 and A8 have all been accepted by WSP.

A9 Requirements for vehicle storage farm buildings

The QFF would like to note that due to the varying nature of farming enterprises and as a result the associated vehicle storage facilities, it is rather difficult to establish the risk associated with vehicle storage farm buildings. Intensive farming enterprises may be limited in their ability to meet the minimum separation distance of a Class 7 building due to spatial constraints. However due to the low occupancy rate, and consequently risk to life safety, of such vehicle storage buildings and any other buildings in close proximity, concessions on the physical distance separations should be considered.

We would note that many of the comments given in this submission are rather generic given the limited timeframe to provide feedback. Please let us know if you require any further feedback or specific examples on any of the issues raised.