Government of Western Australia
Department of Fire & Emergency Services

DFES
Department of Fire & Emergency Services

DFES Built Environment Branch Guideline (GL) 07

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Authorised: Director Built Environment, Legal Policy and Compliance

GL-07: SUBMISSION AND RESPONSE GUIDELINES FOR DOCUMENTS LODGED WITH DFES

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1. Introduction

Compliance with the *National Construction Code* (NCC) is achieved through adherence to its Governing Requirements and Performance Requirements, which may be satisfied via Deemed-to-Satisfy Solutions, Performance Solutions, or a combination of both. Where Performance Solutions are proposed, a Performance-Based Design Brief (PBDB) must be developed in consultation with relevant stakeholders, including the Department of Fire and Emergency Services (DFES).

Early engagement with stakeholders, particularly DFES, is essential to ensure that the fire safety strategy is appropriately scoped and aligned with regulatory requirements.

Obtaining a Certificate of Design Compliance (CDC) is a critical step in the Building Permit process for Class 2 to Class 9 buildings. In accordance with Regulation 18B(1) (R18B) of the *Building Regulations 2012*, building surveyors are required to submit plans and specifications in sufficient detail to the Fire and Emergency Services (FES) Commissioner at least 15 business days prior to signing the CDC. These documents supplied must demonstrate compliance with the FES Commissioner's Operational Requirements.

This guideline outlines the documentation required for lodgement to support the CDC process. It also highlights the importance of aligning project deliverables with the NCC process, including clause A2G2, the *Australian Fire Engineering Guidelines* (AFEG), and the *Guidance on Fire Safety Performance Solutions* from the Department of Local Government, Industry Regulation and Safety (LGIRS).

A flow chart summarising the typical process for a standard project is provided in Appendix B, offering a visual overview of key steps and stakeholder interactions throughout the CDC pathway.

2. Purpose

Submissions enable DFES to assess compliance with the FES Commissioner's Operational Requirements.

To avoid unnecessary delays, it is essential that all documentation forming part of the submissions are final documents (no draft versions will be accepted). The purpose of this guideline is:

- To outline what is meant by sufficient detail when submitting plans and specifications to DFES under the National Construction Code (Part A2) and the Building Permit application process (R18B); and
- To provide direction on how to respond to formal correspondence issued by DFES as part of the assessment process.

DFES will only commence its review once all required documents are provided in sufficient detail. Lodgements will not be accepted unless complete and accurate information is submitted. Inadequate detail will delay the start of the 15-business-day period referred to in R18B. Currently, most lodgements contain only partial details, which significantly impacts the ability to process and review promptly. If during the course of the review it is identified that sufficient detail was not provided, the process will be paused and restarted only when all relevant information is provided. This may impact the progression of plans to the CDC process.

3. Scope

This guideline will cover the following lodgements listed in Table 1 below.

Table 1 Scope of the Guideline

Performance-Based Design Brief (PBDB)	Submitted by Fire Engineers
Deemed-to-Satisfy (DTS) plans and specifications only	Submitted by registered Building Surveyors, Sate / Commonwealth / Port Authorities or Airport Building Controllers.
DTS plans and specifications including a Fire Engineering Report (FER)	Submitted by registered Building Surveyors, State / Commonwealth / Port Authorities or Airport Building Controllers.

4. Lodgement Process

The Electronic Lodgement Form serves as the primary channel for capturing detailed project and single standalone building information. It is essential that the information entered on the form is accurately reflected in all supporting documentation. If the Lodgement Form contains incorrect, missing, or misleading details, it may be paused, rejected and reverted to draft status, requiring the applicant to make the necessary corrections.

The 15-business-day period referred to in R18B commences when the submission is deemed complete and "*in sufficient detail*".

Separate Electronic Lodgement Forms must be submitted in the following cases:

- Multiple standalone buildings located on the same allotment.
- Projects that extend beyond a single allotment boundary.

Submissions are lodged through DFES Electronic Lodgement Form and follow the subsequent steps:

1. Applicant

Depending on the type of documents being submitted, the Electronic Lodgement Form will generally need to be completed by either the Building Surveyor or the Fire Engineer.

2. Receipt of Lodgement Form

After lodgement, the applicant will receive an email with a **DFES confirmation code <Ref #>** which will be used for the processing of documents to DFES.

3. Upload of Documents

A link to the **Building Plan Submission Document Upload Portal Form** – where electronic copies of all plans and documents in PDF format can be provided – will be included along with the DFES confirmation code.

Please refer to Section 5 for details on plans & specifications and required naming convention.

4. Processing of Lodgement

Incomplete lodgements will **not** be **processed**.

The lodgement date is determined by the day the submission is deemed complete and "**in sufficient details**".

Once all documents are submitted via the Building Plan Submission Document Upload Portal Form, the BEB Administrator will commence the processing of documents for assessment.

5. Documents Required and Naming Convention

This section outlines the “plans and specifications” required for lodgements to be considered complete and “in sufficient detail”. All documents must be final versions; drafts will not be accepted. Failure to provide accurate documentation for review will result in DFES rejecting the lodgement, which will affect the 15-business day period referred in R18B.

5.1 Plans, Specifications and the level of details required

The documents may include Deemed-to-Satisfy plans and specifications, or where Performance Solutions are proposed, a Performance Based Design Brief (PBDB) and a Fire Engineering Report (FER) in conjunction with plans and other relevant specifications.

Where alterations or additions are made to existing buildings, any Performance Solutions that previously applied must also be included with the submissions.

Where Performance Solutions are proposed, this guideline should be read in conjunction with DFES Guideline **GL–15**: Fire Safety Engineered Performance Solutions.

Table 2 Plans & Specifications and What should be included in the lodgement if relevant

Hydraulic Fire Services	• Plans showing compliant hose coverage from installed hydrants and/or fire appliances • Marked locations of proposed street hydrants and demonstration of compliant hose coverage • Location and details of on-site hydrants, fire mains, isolation valves, booster assemblies, pumps, water tanks (including hard suction connections), pump room, etc. • Booster assembly configuration (elevation view), including pump controls and water tank level indicators (if applicable) • Schematic drawing for complex and/or multi-storey buildings • Design flow rates for hydrants, sprinklers, drenchers, etc. • Location of fire brigade vehicle access and hard standing
Mechanical Fire Services	• Plans should highlight the ductwork layout including location of air shafts, fire dampers, smoke detectors and the location and function of other fire precautionary features • Roof/ceiling plans to highlight the proposed high-level smoke venting or extraction • Plans should indicate the volumetric rate of flow of air at each point of inlet and outlet of each system including those serving protected staircases, exit passageways, lobbies, areas of refuge, fire pump rooms, generator rooms, rooms used for the storage of flammable liquids or gas or other areas of special risk, etc. • Location of stairwell pressurisation inlet and relief grille • Location of jet fans and capacities • A schematic diagram of the overall system showing clearly the key features and their functions, relative locations in the building, lots, sizes, capacities and other essential information including the air distribution design arrangement
Electrical Fire Services	• Type of fire detection and alarm systems, including EWIS, BOWS, and DBA • Location of fire indicator panel (FIP/FDCIE), and mimic panels • Location of main electrical switchboard and any high-voltage installations, including transformers and distribution boards • Location of alternative energy systems, e.g. solar panels, EV charging points, photovoltaic arrays, and battery energy storage

	systems • Location of exit signs • Location of emergency lifts and standby power supply
Architectural Drawings	**Site Plan** • Street names, allotment boundaries, main entry, vehicular access, and cardinal point • Building setout plan, including proximity to other buildings on site • Site feature survey data, including finished levels for existing and proposed retaining walls, roadway kerbs, and embankments • Location of fences, electronic gates, or other barriers that may delay fire brigade entry **Floor Plan (each storey including basements, mezzanine and roof)** • Details of all openings and voids penetrating floors including their usage, dimensions and the nature and arrangement of enclosing walls and barricades • Clear statements indicating the design occupant load for that storey or roof, for which means of escape in case of fire have been provided, including the calculation method used to determine the design occupant load • Details of all means of escape to the exterior at ground level from every part of the floor such as exit doors, corridors, passageways, aisles, gangways, balconies, lobbies, ramps, exit passageways, escape and fire-isolated staircases and areas of refuge • Fire and smoke compartmentation strategy, including location, size (floor area and volume), FRL rating, and type of separation (e.g. fire compartments, separate buildings, protection of openings, etc.) • Indication of existing building areas relevant to the current submission (if applicable) • Dimensioned building layouts • Height and layout of storage racking • Details of storage of flammable liquids or gases and whether Dangerous Goods Licence is applicable **Sections** • Height of each level or storey • Effective building height as defined in the NCC • Finishes schedule, including use of cladding materials • Details of all openings and voids penetrating floors including their dimensions, usage and height of enclosing walls and barricades • Sealing requirements for penetrations in fire-resistant elements • Details of the junction between the roof and any compartment walls • Construction details for fire and smoke compartment boundaries, including continuation to the underside of the roof and intersections with other elements • Clear height of all structures or projections directly above the access for fire fighting vehicles and equipment • Enlarged details of curtain walling at the junction with the typical floor slab to show the provision of fire stopping or fire cavity barriers **Elevations** • Height of each level or storey • Effective building height as defined in the NCC • Clear distance of the external wall from the fire appliances and

	equipment access, lot boundary, adjacent buildings and other structures. • Finishes schedule, including use of cladding materials **Door schedule** • Fire Resistance Levels • Smoke seals • Self-closers • Location of fire bolts
Flow and Pressure Test Report	A current and complete hydrant flow and pressure test report should form part of any submissions with a new hydrant system or when the design relies on an existing hydrant system. This report should: • Include testing company contact information • be dated within 12 months of the submission • include equipment calibration certificates dated within 12 months of the hydrant test (for either analogue or digital equipment); and • highlight the location of all tested hydrants.
Performance-Based Design Brief (PBDB)	The PBDB must be in accordance with the Australian Fire Engineering Guidelines (AFEG). Any documents in support of the subject Performance Solutions should be included. These documents may include: • Architectural plans (e.g. floor plans, site plans, elevations, etc,) and any other relevant plans • A current and complete flow and pressure test report • Preliminary calculations methodology, inputs and results • Manufacturer's specifications • Fire test reports (in full) • Records of stakeholder with engagement with DFES or others. If a **revised PBDB** is lodged: • All changes from the last submitted PBDB must be clearly highlighted; otherwise, a full review may be conducted. • The response to DFES preliminary advice letter should be appended.
Fire Engineering Report (FER)	The FER must be in accordance with the Australian Fire Engineering Guidelines (AFEG). Any documents in support of the subject Performance Solutions should be included. These documents may include: • Architectural plans (e.g. floor plans, site plans, elevations, etc,) and any other relevant plans (e.g. structural, mechanical, electrical, etc.) • Signed letters from owner/s, tenant/s and/or operating team/s acknowledging the proposed fire strategy as per the FER and committing to the requirements stated in the FER • A current and complete hydrant flow and pressure test report • Maintenance records, certificates and/or letters confirming that the existing systems have been maintained and are fit for purpose • Manufacturer's specifications • Fire test reports (in full) • Confirmation, in the form or a letter or report, from other professionals (e.g. structural, mechanical, electrical engineers,

	bushfire consultants, dangerous goods consultants, etc.) on the adopted input data / values or design • The response to DFES preliminary PBDB advice • All design calculations • When calculations spreadsheet are adopted, the equations should either be detailed in the core of FER or clearly visible on the spreadsheets; • Where fire and/or evacuation modelling has been conducted as part of a Performance Solution, the modelling input and output files should be submitted in a usable format (i.e. electronic data on CD, DVD, USB drive, hard drive or via a file share provider). If a **revised FER** is lodged: • All changes from the last submitted FER must be clearly highlighted; otherwise, a full review may be conducted. • The response to DFES fire engineering advice (if applicable) must be appended.

5.2 Preparation and Naming Convention

Table 3 Formatting

Format Required	One pdf document per category
	Titles and references (e.g. revision number, date, etc.) must accurately reflect each document
	<Ref #>_Hydraulic fire services.pdf <Ref #>_Mechanical services.pdf <Ref #>_Electrical fire services.pdf <Ref #>_Architectural drawings.pdf <Ref #>_Flow and Pressure Test Report.pdf <Ref #>_Fire Hydrant Coverage.pdf <Ref #>_PBDB Rev n.n Date dd Month Year.pdf <Ref #>_FER Rev n.n Date dd Month Year.pdf
	All plans of building works shall be scaled such that the information presented is clearly legible.

6. Review Process and Timeframes

All submissions received by the Department of Fire and Emergency Services are reviewed in accordance with established internal processes designed to ensure consistency, fairness, and alignment with DFES's strategic commitments.

DFES operates under the following guiding principles:

Table 4 Principles

Vision	All Western Australians working together for a safer State
Purpose	To achieve a safer Western Australia by enabling and protecting the community before, during and after emergencies
Code of Conduct	Scrutiny, Ethical, Lawful, Fair

These principles underpin our lodgement review process, which involves:

- Initial verification of submission completeness
- Technical assessment against the FES Commissioner's Operational Requirements.
- Coordination with relevant internal stakeholders where necessary.

All lodgements are assessed within timeframes that reflect the complexity of the submission and current workload.

Documentation provided to DFES through this process is confidential and no information will be shared with other stakeholders unless permitted under legislation.

If submissions are of a complex nature, please allow for a reasonable amount of time for DFES to provide the FES Commissioner's advice on the fire safety strategy contained within the DTS plans, PBDB, FER and other specifications.

7. DFES Correspondence

Upon completion of the review, a DFES officer will provide written advice to the applicant.

Table 5 Correspondence Received by Applicants

PBDB	A "*FES Commissioner's Preliminary Advice*" letter will be issued by the DFES Fire Engineering team to the applicant / fire engineer. Where relevant, other stakeholders may be included as recipients of the correspondence for their information.
DTS plans and specifications (with or without FER)	A "*Building Regulations 2012 (18B) FES Commissioner's Advice*" letter will be issued by a Building Fire Safety Officer to the applicant. A copy of the advice letter will also be sent to the building owner and Permit Authority using the email addresses provided in the Electronic Lodgement Form.

8. Responding to DFES Correspondence

In some circumstances, a response to DFES advice may be required. Refer to Appendix C for templates.

Table 6 Response to DFES Advice

Responding to The FES Commissioner's Preliminary Advice	A formal response to the preliminary advice letter should be emailed to BEB or provided as an appendix in a revised PBDB or in the FER. This response, using DFES template – provided with preliminary advice letter – should indicate whether DFES advice has been incorporated, and if not the reason why.
Responding to The Building Regulations 2012 (18B) FES Commissioner's Advice	**Online Response Form:** To facilitate a streamline response for building surveyors, a link to the Response to FES Commissioner's advice form is available in each email issuing the FES Commissioner's advice letter. A pdf copy of the response form will be sent to both the applicant / building surveyor and BEB admin. This new response form can be used either: • to confirm acceptance of the FES Commissioner's advice; or • to advise which of the FES Commissioner's advice is not

	being incorporated. **Advice Not Incorporated:** When the FES Commissioner's advice is not followed, *Building Regulation 15A(1)* applies: *15A. Provision of information to FES Commissioner* *(1) Within 10 days of receiving the FES Commissioner's advice in respect of plans and specifications provided under regulation 18B(1), the building surveyor must notify the FES Commissioner in writing of* *(a) any part of the FES Commissioner's advice that is not incorporated in the plans and specifications that are specified in the certificate of design compliance for the building; and* *(b) the reasons for not incorporating that advice.* If the building surveyor progresses with signing the Certificate of Design Compliance prior to receiving the FES Commissioner's advice, they are still required to advise the FES Commissioner in writing within 10 days of receiving the advice letter if any of the advice is not followed. **Revised Documents:** Revised plans and/or FER that require a review should be formally lodged via DFES Electronic Lodgement Form. If a review is not required, the revised plans and/or FER can be emailed to BEB admin for records keeping purposes only.

9. Building Occupancy Stage

9.1 Occupancy Permit

As per Building Regulations 2012, ***15A. Provision of information to FES Commissioner****:*

(2) ***The permit authority that grants an occupancy permit*** *for a building in respect of which plans and specifications were provided to the FES under regulation 18B(1)* ***must give*** *to the FES Commissioner* ***a copy of the occupancy permit****.*

(3) ***The permit authority that modifies an occupancy permit*** *referred to in subregulation (2)* ***must give*** *to the FES Commissioner* ***a copy of the form of modification.***

9.2 Direct Brigade Alarm

Where the building is required to be fitted with a Direct Brigade Alarm (DBA), further information is available on Direct Brigade Alarm webpage.

The DFES DBA team can be contacted via dba@dfes.wa.gov.au.

10. Legislation

Building Act 2011

Building Regulations 2012

11. References

DFES Operational Requirements Guidelines ORG 1 to ORG 10

BEB Guideline GL-15 - Fire Safety Engineered Performances

DBA Connection Code

National Construction Code (NCC) 2022 Volume One, Australian Building Codes Board

Australian Fire Engineering Guidelines (AFEG), Australian Building Codes Board

Guidance on Fire Safety Performance Solutions, Department of Mines, Industry Regulation and Safety

Building approvals

Consultation Regulatory Impact Statement, Reforms to the approval process for commercial buildings in Western Australia, December 2019

Appendix A – Definitions

The following definitions apply for the purpose of this guideline.

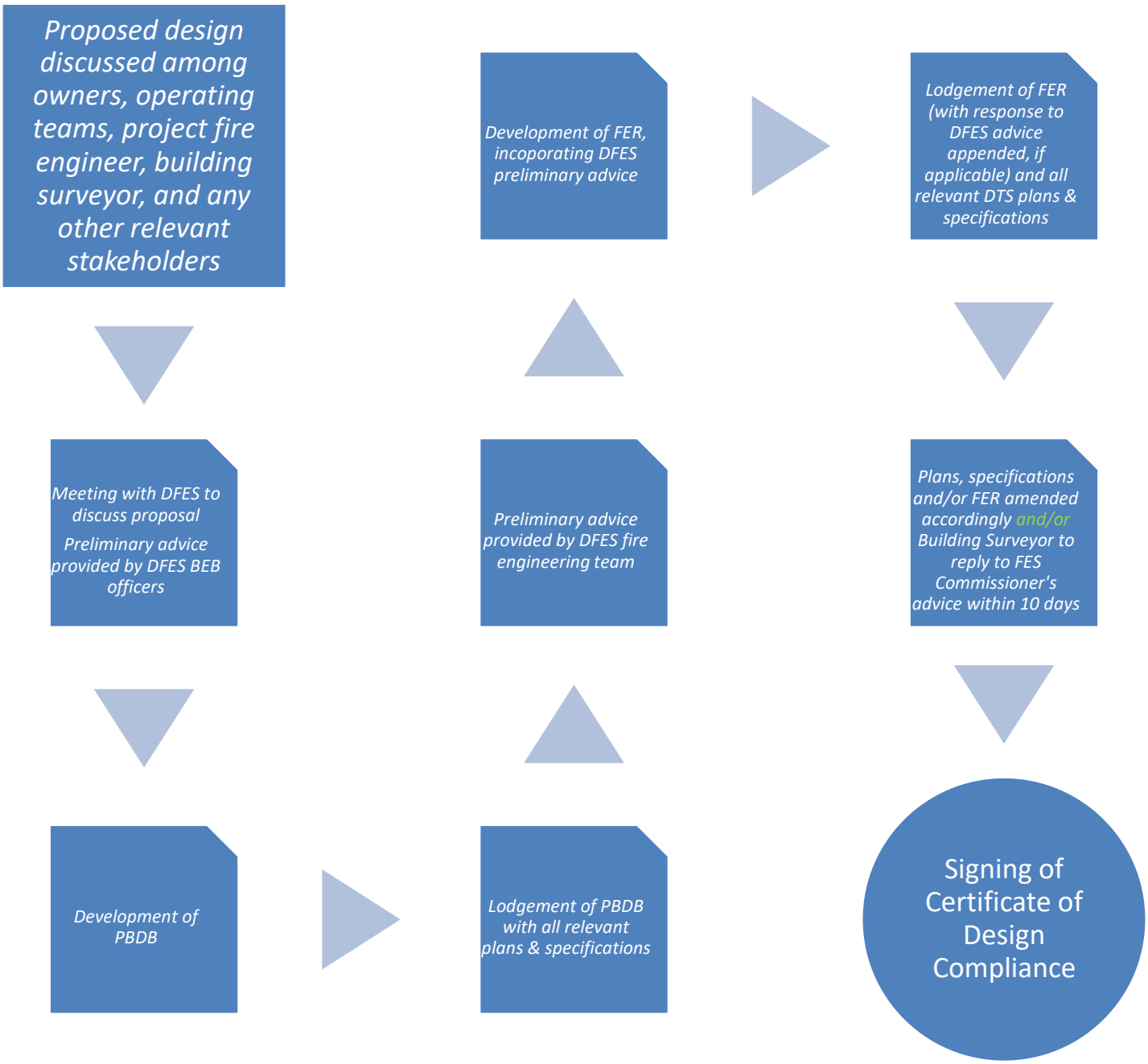
Building Surveyor	In Western Australia, a building surveyor (officially referred to as a building surveying practitioner) is a registered professional responsible for assessing building plans and structures to ensure they meet safety, accessibility, and energy efficiency standards under the relevant legislation. Under the *Building Services (Registration) Act 2011* existing accredited building surveyors are taken to be registered in one of the following three classes of building surveying practitioner: • Building surveying practitioner level 1 – no limit to type of work that may be carried out. • Building surveying practitioner level 2 – limited to certifying compliance of Class 1 or Class 10 buildings and Class 2 to Class 9 buildings with a maximum floor area of 2,000m^2 and not more than three storeys. • Building surveying practitioner technician – limited to certifying compliance of Class 1 or Class 10 buildings and Class 2 to Class 9 buildings with a maximum floor area of 500m^2 and not more than two storeys.
Certificate of Design Compliance (CDC)	In Western Australia, the Certificate of Design Compliance (CDC) is a formal document required under the Building Act 2011 and Building Regulations 2012. A CDC certifies that the proposed building work complies with all applicable building standards, including the National Construction Code (NCC) and other relevant regulations. It must be issued by a registered building surveyor before a building permit can be granted.
Commissioner's Operational Requirements	The DFES Commissioner's Operational Requirements are a set of fire safety expectations and technical guidelines issued by the Department of Fire and Emergency Services (DFES) in Western Australia. They apply to the design and construction of Class 2 to 9 buildings and aim to ensure that buildings support safe and effective firefighting operations, community resilience, and compliance with the National Construction Code.
Deemed-to-Satisfy (DTS) solution	A Deemed-to-Satisfy (DTS) solution is a prescriptive method of complying with the National Construction Code (NCC), where the design meets specific provisions that are deemed to satisfy the relevant Performance Requirements
Fire Engineer	An appropriately qualified and experienced practitioner who, through sound and robust engineering practice, provides services that achieve reductions of risk for life for people in structures, reduction in property and environmental damage from structure fires, and the implementation of fire safety codes and regulations.
Fire Engineering Report (FER)	Final documentation of the AFEG process applied to a building. The FER containing the evaluation that the assessment of Performance Solution(s) has demonstrated compliance with the relevant Performance

	Requirements. The FER is submitted under the requirements of Building Regulation 18(B) and should be prepared in accordance with the principles of the AFEG.
Permit Authority	Under the Building Act 2011 and Building Regulations 2012 (WA), a Permit Authority is the entity responsible for administering building control functions, including the assessment and issuance of building, demolition, and occupancy permits. This authority is typically a local government but may also be the State Government or a designated special permit authority. The Permit Authority ensures compliance with statutory requirements and coordinates with relevant stakeholders, such as the FES Commissioner, particularly in relation to complex buildings under Regulations 15A and 18B.

Performance-Based Design Brief (PBDB)	Previously known as Fire Engineering Brief (FEB).
	
	The PBDB is a documented process that defines the scope of work for the fire engineering analysis and the basis for analysis as agreed by stakeholders.
	
	DFES considers the PBDB should include (as a minimum):
	• Relevant stakeholders
	• Building characteristics
	• Occupant characteristics
	• General objectives (building and regulatory)
	• Hazards and preventative and protective measures
	• Trial design for evaluation including:
	  ○ Non-compliance identified and relevant Performance Requirements
	  ○ Proposed approaches and proposed methods of analysis (including inputs / parameters, fire scenarios, etc.)
	  ○ Acceptance criteria and safety factors
	• Standards of construction, commissioning, management, use and maintenance
	• Appended plans or specifications including:
	  ○ Site plan, floor plans, elevations and sections (as relevant to the proposed Performance Solutions)
	  ○ Test reports and/or specifications for performance-based systems specified in the brief

Performance Solution	Means a method of complying with the Performance Requirements of the BCA other than by a prescriptive Deemed-to-Satisfy Solution (the Performance Solution may contain proponents of a Deemed-to-Satisfy Solution). Previously referred to as Alternative Solution in preceding editions of the BCA.
Plans and Specifications	Refer to detailed drawings, technical documents, and supporting information demonstrating compliance with the National Construction Code and the FES Commissioner's Operational Requirements.

Appendix B – Process Involving Fire Engineering



Appendix C – Templates (Subject to Change)

The current versions are issued through formal correspondence and may be updated independently of this guideline. Users should refer to the latest version received via official communication channels.

Responding to The FES Commissioner's Preliminary Advice

Response to DFES Preliminary Advice Letter

PROJECT DETAIL	
DFES Reference Number	xxxxxx-xx-xx

PROJECT FIRE ENGINEER DETAILS	
Full Name	
Company	
WA Registration (if applicable)	

PORJECT FIRE ENIGNEER RESPONSE			
Item	DFES Preliminary Advice	Advice Incorporated? Yes / No	Reason/s for Not Incorporating Advice

GOVERNMENT OF WESTERN AUSTRALIA

DFES
Department of Fire & Emergency Services

Response to FES Commissioner's advice

It is the responsibility of the project Building Surveyor, signing the Certificate of Design Compliance, to issue the 15A response.

As per Building Regulations (2012) ***15A. Provision of information to FES Commissioner (s. 149)***

1. ***Within 10 days of receiving the FES Commissioner's advice in respect of plans and specifications provided under regulation 18B(1), the building surveyor must notify the FES Commissioner in writing of —***

   (a) any part of the FES Commissioner's advice that is not incorporated in the plans and specifications that are specified in the certificate of design compliance for the building; and

   (b) the reasons for not incorporating that advice.

The intent of this form is to inform the Built Environment Branch which advice has not been followed. Please note that you **cannot** use this form prior to receiving the **BUILDING REGULATIONS 2012 (18B) – FES COMMISSIONER'S ADVICE** letter.

Has the FES Commissioner's advice been incorporated? *

- ◯ Fully
- ◯ Partially
- ◯ Not at all

Building Surveyor details

Full Name *

Contact Phone Number *

xx xxxx xxxx

Please enter a valid phone number.

Contact Email *

example@example.com

Registration Number *

e.g: ABC123

Level *

Please Select

Attention: *

Type DFES Officer name

Project details

DFES Reference Number (e.g, 123456-789-101) *

xxxxxx - xxx - xxx

Project Address *

Your Reference Number: *

Project description *

0/250

Note: Add a row for each item of advice not incorporated. *

FES Commissioner's Advice	Reason/s for not incorporating it

+ Add Row

Additional Information

0/250

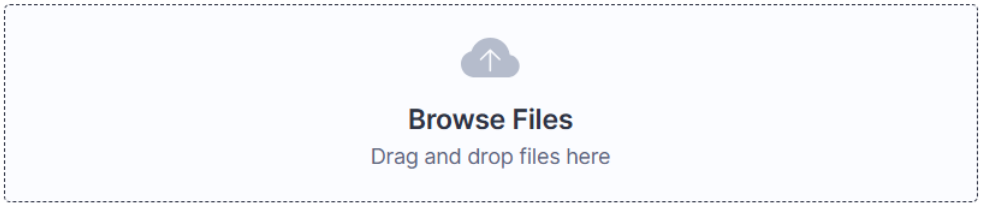
PLEASE NOTE:

- The Document Portal **does not** accept documents **50MB** or over. If your documents are 50MB or over, please contact bebadmin@dfes.wa.gov.au. Alternatively, you can split a **50MB** PDF into **Part 1** and **Part 2**.
- Please name each document appropriately (e.g. Revised hydraulic fire services, Revised hydrant coverage plans, Flow and pressure test report, Revised FER Rev n Date ddmmyyyy). **DO NOT** use special characters in your document titles i.e **!@#$%&*()":"<>?'+_**

☐ Supporting documents,uploaded as part of this 15A Response Form, will be checked by the assessing fire safety officer. **Please note revised Fire Engineering Reports, plans and/or specifications that are required to be reviewed, must be formally lodged via BEB Electronic Lodgement Form.** *

Files Over 50 MB documents cannot be uploaded.

Attachments (if applicable):



Please name the documents appropriately for easy identification

***Please note**: This is a controlled document. DFES guidelines are available on the DFES Website: www.dfes.wa.gov.au.*

Should the information provided in this guideline require further clarification, please contact DFES Built Environment Branch via email bebadmin@dfes.wa.gov.au.

Disclaimer

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