

BREATHING APPARATUS SAFETY CAMPAIGN

We are facing one of our biggest threats in decades.

It is imperative that members take ownership of this issue, take part actively and continuously oppose its introduction and implementation.

It is important to set out from the start that the argument is not about the FBU disliking a solution adopted by the National Fire Chiefs Council (NFCC). It is that the NFCC have not identified a solution, but in fact created an additional major problem.

This is not a matter of firefighter safety vs. public safety - it is a matter of firefighter safety **and** public safety.

Finally, it's important to recognise that this is not just about fires in tall buildings. **This is about breathing apparatus (BA) at all fires.**



RISKS

Firefighters have long known the risks from inhaling smoke, carbon monoxide, hydrogen cyanide, toxic substances, asbestos and other particulates. Firefighters working in oxygen deficient atmospheres has led to:

- Firefighters becoming injured on the fireground
- Firefighters with long term disease and cancer.

The FBU is currently running the biggest ever UK research project into contaminants from the fireground and the impact on firefighters' health – a key issue for every member. BA emergencies are the number one cause for the death and injury of firefighters in the line of duty.

BREATHING APPARATUS

Since World War Two, firefighters have used breathing apparatus to protect themselves on the fireground from these risks.

Since the Smithfield fire in 1958, the FBU has fought for operational procedures for the correct use of breathing apparatus. This was reflected in Fire Service circulars, the manuals of firemanship (as was), the drill book, technical bulletins and operational guidance.

These procedures, including BA entry control points, donning in fresh air, use of tallies and warning signals, are designed to keep firefighters safe and were developed as the result of deaths and injuries to firefighters.

Even with these procedures we lose too many firefighters in fires. The NFCC's policy will result in even more firefighters' deaths



THREATS

For a number of years, some chief fire officers have been trying to push back against safe BA procedures. Since the Grenfell Tower fire, some chief fire officers have tried to downgrade procedures and firefighter safety to help the Westminster government with its building safety crisis.

Instead of dealing with cladding and the failure of compartmentation, ministers want firefighters to take on even more risks. The FBU has warned for decades about the risks of cladding, the lack of enforcement and against cuts to our service.

Putting firefighters at risk is not an answer to the building safety crisis. Letting those responsible be allowed to pay for decades of failure and deregulation with the safety, and possibly the lives, of firefighters, just because it is cheaper, is not the answer.

We want to stress - the NFCC plan does not provide the answer to the building safety crisis or the problems encountered at Grenfell.

NEW PROCEDURES

A number of chief fire officers want to introduce new procedures, which will allow firefighters to be deployed in high rise fires beyond the entry control point but not under air. These include:

- Wanting to deploy firefighters high up within the building, without BA started up.
- Wanting to deploy firefighters on stairways to assist with various activities.

These new procedures put firefighters at an even greater risk, which is why the FBU opposes them.

The National Fire Chiefs Council (NFCC) issued guidance last year, which leaves it to chief fire officers to introduce these dangerous new procedures. The FBU recently won at the health and safety panel in the London Fire Brigade regarding this issue.

Other chief fire officers are ignoring the panel outcome and are trying to implement these procedures, or are planning to implement them in the near future.

They have not consulted properly with FBU safety reps or explained how firefighters will be protected in these challenging new circumstances.

OPERATIONAL PROBLEMS

Breathing apparatus, the tallying system, warning whistles, Automatic Distress Signal Unit and related equipment are designed to be used in tandem with safe BA procedures, to reduce the risks when committing firefighters into hazardous situations.

BA sets are designed to be started up in fresh air. The BA entry control point is established and moved as necessary to ensure it is in fresh air. Pre-entry checks are essential safety requirements.

The time to find a fault is at the BA Entry Control Board, in safe air where it can be rectified or deployment stopped, not once deployed into the risk area, when it is likely to be impossible to rectify any failures in deteriorating conditions and will therefore unnecessarily endanger firefighters.

Adjusting other personal protective equipment such as helmet, fire hood, tunic and gloves on the move whilst in the hazard area would also be necessary if going under air beyond the BA entry control point and would therefore amplify the risk further. BA comms are rendered extremely limited if the BA mask isn't donned properly .

We want to emphasise here that in relation to tall buildings, the documentation correctly refers to the bridgehead. **But if this is allowed to proceed in tall buildings, we will see this being extended by the NFCC to all fires on the basis of "if this can be done 100 metres above ground level, it can be done anywhere".**

So this about wearing BA under air beyond the entry control point. We need to remember that we have lost members in house fires, such as at Blaina Gwent.

BA EMERGENCY

These new procedures do not explain how officers managing the BA entry control could monitor and command those firefighters committed, or the wear, without wearers starting up.

If the BA entry control officer has concerns about safety, they may have to declare a BA emergency and deploy more firefighters to search for and rescue their colleagues.

These procedures explicitly and by design deploy firefighters beyond the bridgehead, to places beyond the duration and limitations of a BA set.

This would have knowingly and intentionally sent firefighters to points of the risk area beyond the capacity of an emergency BA team to reach and rescue them.

In those circumstances, BA wearers in distress would have become un-saveable. No chief fire officer has explained how firefighters can rescue other firefighters – or members of the public – in these circumstances.

PUBLIC SAFETY

The root of the problem is a building crisis – reducing BA safety doesn't make buildings safer, now or in the future. Dead or injured firefighters cannot save anybody.

In the event of a BA emergency all available resources would be redirected from rescue and firefighting operations resulting in reduced resident safety.

CFOs have not answered the questions:

- How much air would be saved?
- How much air needs to be saved? For what tasks?
- How much air is needed to perform those tasks?
- How does this alter per individual physiology?
- Do those tasks increase resident safety?

No clear identifiable benefit to operations or public safety has been identified. **We are being asked to balance the intolerable risk of dead firefighters against an unknown benefit which has not even been identified to exist.**



ILLEGAL

The FBU argues that these new procedures are illegal, because they unnecessarily breach obligations under the Health and Safety at Work etc. Act 1974 and other health and safety regulations.

The proposed procedures remove a safety critical, reasonably practicable risk control measure firefighters have relied upon for decades to protect themselves in already hazardous situations.

BA procedures are an established safety measure, which firefighters have been highly trained to implement. Removing this measure, knowing that firefighters could be killed, injured or suffer ill health, is extremely negligent and irresponsible.

The procedure intentionally lowers firefighter safety to lower than which can reasonably be expected and practicably achieved. This places our officer members at the potential and unacceptable risk of facing criminal charges.

SUMMARY

The proposed policy is unsafe because it would:

- Be in breach of a Fire and Rescue Authority's obligations as set out in the Health and Safety at Work etc. Act 1974 and associated health and safety regulations
- Remove a reasonably practicable and easily implemented risk control measure
- Reduce the level of safety below that which is known to be reasonably practicable to achieve
- Overturn decades of safe BA practice
- Undermine vital BA and PPE pre-entry checks and safe systems of work
- Render it impossible for BA teams to calculate working duration and safe turn-around pressures
- Expose firefighters to toxic fire effluents and other substances hazardous to their health
- Undermine public safety by the potential to hamper fire ground operations, rescue efforts and the redirection of available resources

- Ignore lessons learnt from previous firefighter deaths, injuries and BA emergencies, such as the 2003 Petershill Court fire in Strathclyde
- Knowingly place BA teams beyond the point of rescue
- Completely remove the responsibilities of the BA Entry Control Officer and their ability to monitor and supervise the BA wear
- Breach PPE regulations and undermine and render firefighter PPE ineffective. It would further require firefighters to commit a breach of the same health and safety regulations
- Not make buildings safer
- Offer no identifiable benefit to public safety.

CONCLUSIONS

The FBU wants members to understand fully why we have taken a stand on this issue.

- It is imperative that members take ownership of this issue
- It isn't an abstract policy position
- The union has a duty to protect our members – nobody goes to work to die or get hurt
- The FBU cannot accept more dead and injured firefighters because of this new procedure
- The union cannot accept firefighters being put at a greater risk for no obvious gain.
- The FBU does not want officers and other firefighters facing prosecution when things go wrong as a result of these new procedures
- The FBU opposes those Chief Fire Officers who say firefighter safety is their priority whilst at the same time placing us in avoidable and unnecessary danger
- This is about our safety and health, our lives and our job
- We need to stand together, look after each other and not throw out long established BA procedures
- We cannot let those responsible be allowed to pay for the failures that led to Grenfell with the safety of firefighters, just because it is cheaper!

WHAT FBU OFFICIALS ARE DOING

- Challenging this at national level in discussions with the Home Office, HSE, and NFCC
- National officials are providing information and advice to local officials who are challenging it at FRS level
- Taking legal advice in order to be prepared to take whatever steps are necessary on any front
- Preparing officials across the UK should any FRS decide to take steps to adopt the NFCC policy

WHAT WE REQUIRE OF MEMBERS AT THIS STAGE

- Hold branch meetings to discuss this vital safety matter and vote on the standard motion - have your say
- When approached by management, in training or operationally, be informed of and ready with the arguments and challenges against this unsafe procedure – make your views known
- Inform your CFO that as a professional firefighter & BA wearer you will go under air when, where and how you assess to be safe and within a safe system of work - at the entry control board

All documents relating to the FBU BA safety challenge can be found on the FBU website at:

www.fbu.org.uk/news/2021/05/13/fbu-defends-vital-breathing-apparatus-safety-procedures

