



NFCC
National Fire
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The professional voice of the
UK Fire & Rescue Service

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Susan Revell
British Standards Institution
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Sent via email to: susan.revell@bsigroup.com

10th November 2021

Re: PAS 8672 Built Environment – Framework for competence of individual Principal Contractors and Designated Individuals working under Organizational Principal Contractors – Specification

Dear Susan

To: British Standards Institution

The National Fire Chiefs Council (NFCC) is the professional voice of the UK fire and rescue services (FRSs) and is comprised of a council of UK Chief Fire Officers. This response was put together by NFCC's Protection Policy and Reform Unit (PPRU) following consultation across UK FRSs.

NFCC is pleased to respond to the consultation for PAS 8672 *Built environment – Framework for competence of individual Principal Contractors and Designated Individuals working under Organizational Principal Contractors – Specification*.

NFCC welcomes the creation of PAS 8672 as a key document which will assist in driving improvements in competence standards in the built environment industry. It will also support the introduction of the new building safety regime under the Building Safety Regulator. The PAS is comprehensive in its approach and follows the guidance given in *BSI Flex 8670 Built environment – Overarching framework for competence of individuals* specification.

NFCC are also pleased to note that PAS 8672 does not limit the role of a Principal Contractor to higher risk buildings. This is important as it does not reinforce a dual standard safety regime where occupants living in buildings falling under the new legislation have greater oversight of fire safety provisions than those who live in buildings not governed by the Building Safety Act.

As with many sectors falling under the auspices of the new building safety regime, the challenge will be in the delivery of individuals who meet the specified competence criteria. The publication of this PAS will be the first stage in identifying and developing appropriately competent Principal Contractors who can perform this role. Further work will need to be carried out on the training and independent verification of Principal Contractor competence.

One significant item which NFCC considers needs to be addressed is the duplication of information in the document and the lengthy commentary for all sections which requires judicious editing. We consider that this change will result in a much shorter and more accessible document which will assist all users going forward.

We trust the attached submission is helpful and welcome further discussions following the outcome of the consultation.

Yours sincerely,

Nick Coombe MBE EngTech FIFireE
Deputy Head of Protection Policy and Reform Unit