PRACTICE NOTE 22
WEBINAR Q&A

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engineering new zealand
te ao rangahau

Question	Answer Alternating text colours are used to indicate responses from different panel members.
Where in the legislation can the BCA request (or indeed force) a fire engineer to provide a PN22 coordination statement? I don't believe there is, but interested in the legal status of the request.	There is no explicit legal requirement in PN22 to provide a coordination statement. The panel discouraged a "force it" approach and framed PN22 as a tool for clearer coordination that helps BCAs assess applications.
Paul Richards highlights coordination issues between the fire engineer and the architect. The issue starts with the industry using definitions that are not well defined: ie one way or two way rating. The definition seems to differ between fire engineers, specifiers and system suppliers. Some clarity will be required.	Manufacturer details identify if systems are one way rated or two way rated. I would recommend designers refer to systems specifications rather than the lining only eg GBS 60 comparted with 1x13mm Fyreline either side of steel stud. This clearly identifies what is proposed to be built and provides clarity on the performance that will be achieved. If the system does not achieve the intent of the fire design, then the fire engineer can provide specific feedback. The fire designer should include in their report whether a system needs to be one-way or two way. It is expected that the consent documents and drawings clearly identify the appropriate proprietary fire-rated systems (eg GBTL 60, GBUW 120), rather than simply specifying the number and thickness of GIB boards. These systems must be selected and detailed in coordination with the fire design/report to ensure they meet the required fire safety features—such as fire resistance rating (FRR), direction of protection (one-way or two-way), and any other relevant performance criteria.
The snapshot shown by Paul did not show the full detail/advice note on the fire summary drawing. Was there a specific advice note provided and the architect did not incorporate it into their design? Maybe the architect didn't discuss the detail with the fire engineer prior to lodging consent for PN22 review or the fire engineer was not aware of when consent was to be lodged to complete PN22? One way and two way ratings are defined in the GIB fire document, including top/down FRR ceiling scenarios.	The selected ceiling lining (13mm GIB standard) does not achieve the 60 minute fire rating required by the fire design. Any additional notes/details in the fire drawings don't change that fact.
In the last 8 years of practicing, I have not seen one single use of PN22. It does not seem that architects or structural engineers are aware of the existence of this document. is this something the fire engineers typically brings to the design team?	I see them on ~ 3/4 of my projects, and yes, it is usually raised by the fire engineer. This is likely because of the nature of the work and complexity involved. For very simple projects with only basic safety features (eg fire features and systems that would be on a compliance schedule, or with limited fire rated constructions) the benefits and need to use PN22 as guidance to support project coordination may not be as beneficial as for more complex projects, especially where a fire engineer is involved and has requirements for many other members of the design team to design and coordinate. We need to remember that as well as architects, there are others who will be responsible for design coordination and the accuracy and totality of the project information. Approval bodies also have a role in needing to check all of the consent information. If it is not final, complete and the documentation (plans and specifications) has missing information and errors, then it will create extra work and make the consenting process more difficult, increasing time delays and associated costs. As fire designs can place requirements on other disciplines, coordination is essential to ensure that the fire design and other disciplines requirements have been properly communicate and then incorporated into the design documents.

The scope of PN22 is so broad that filling it out to the full extent would result in a big cost increase to simple s112 fire reports.	The cost of undertaking appropriate coordination should be inherent to the project cost and should not be seen as anything extra or additional to basic good project communication and reporting tasks. PN22 simply provides guidance for how project coordination can occur with the extent relevant to the size and complexity of the project. For small simple projects with a limited number of things to co-ordinate, PN22 requirements would be minimal. For complex projects, following PN22 coordination provides inherent cost benefits, including: • Improved quality and accuracy of consent documentation, which can reduce construction costs by minimising the risk of incorrect product procurement or installation. • Reduced risk of future consent amendments, thereby avoiding the additional time and costs associated with processing amendments. • A more streamlined consenting process, resulting in efficiency and fewer delays during the approval stage.
Has Engineering New Zealand or the Building Consent Authority provided any example of a coordination letter statement(eg template document) to clarify their requirements and indicate the appropriate references to be considered?	Yes, PN22 includes an example coordination statement. The panel did not identify separate official templates beyond PN22 and recommended tailoring the statement to the current consent documents.
Who "owns" PN22? I understand the document is about "shared responsibility" and "coordination" in design, but it needs someone leading it, otherwise it will not lead to the expected outcomes	Coordination leadership should be assigned by the client and design team. It does not default to the fire engineer. On bigger jobs it is often the lead consultant or PM; on others it may be the architect. Decide and document it early.
Is the new PN22 being issued or supported by MBIE under section 175 Building Act 2004?	There was an MBIE rep in the working group, and the published PN22 V2 has the wording ' The Ministry of Business, Innovation and Employment (MBIE) is pleased to support Engineering New Zealand developing this Practice Note to improve the way fire safety designs are documented and coordinated between technical disciplines'.
What if the fire engineer insists to issue that statement only on the basis that the other designers equally issue a coordination statement. Over the years NZIA advised Architects AGAINST issuing this: nzia.co.nz/media/1003/11-july-2016-fire-coordination-statement-ipenz-pn-22.html	Coordination is everyone's role/responsibility. Coordination statements are one means to communicate and record what level of coordination has occurred and who has done what. Other means to demonstrate coordination may carry equivalent value. No one should insist on coordination statements, but they support an established way of communicating that it has been done. Other means to document and show that design requirements have been coordinated and documented could be acceptable. The statement however, is likely and continues to prove to be an efficient means of confirming that project coordination has occurred. NOTE: The NZIA was represented on the development of the document and did not state that their members would not provide a Coordination statement.
So why is it OK for the fire engineers to provide the statement when they are only a very small part of the overall design team and the fire report is a performance document for others to design to?	Why wouldn't it be OK? Some fire engineers also design. Some fire engineers are also a recognised part of the design team and work together with other disciplines to deliver projects. Even where fire engineers may do nothing more than write a report for others to read and undertake their design based on, the fire engineer is likely to know best, what is expected and should readily be able to confirm that what they specify has been designed by others. Of course it is not the only way. It is expected that the other members of the design team are also providing coordination statements. it is not expected that the only coordination statement is from the fire engineer.

The biggest coordination issues I have seen in projects has been around post fire stability requirements meaning that other elements (not highlighted by the fire engineer) need to be rated. Is there additional clarity provided in the updated PN22 guidance for this issue?	This is why it is important for fire engineers and structural engineers to work together and to clearly understand each other's requirements. APPENDIX C includes a new design features report for structural fire resistance to support better coordination between fire and structural engineers for this reason. It may be prudent for the fire engineer to include in their documentation a statement to the effect that the structural design may also include fire resistance rating requirements.
Fire engineers sometimes claim PN22 is not required by council and don't provide it. However, they ask structural engineers to submit coordination statements as requested by the BCA. Such requests should be consistent and not limited to structural engineers alone. Who owns this?	It is up to the project owner. Councils cannot force or require PN22 and that issue misses the point. Councils want to see PN22 and coordination statements because it can provide confidence that the design has been undertaken by a design team that has worked together to deliver the project. This provides confidence that the documentation, plans and specifications will be final and complete and may support reduced processing time frames from councils who would otherwise need to check information and do cross checks of that information across the disciplines. For complex projects, requests for PN22 coordination review and the subsequent coordination statement are typically discussed and agreed upon during the Fire Engineering Brief (FEB) stage—particularly where the fire design follows C/VM2 or involves alternative solutions. In such cases, the PN22 coordination statement is expected to be submitted at the consent stage. Please note that coordination is expected across all design disciplines, not just from structural engineers.
Should PN22 coordination include the fire engineer checking with FENZ regarding the location of appliance hard stand and the measurement of the hose run length?	If the measurements and solution fall within the requirements of the standard then this would not be expected. If there are variances to the standard, such as a slight shortfall, which is to discussed and agreed with FENZ, then yes, this should be included in coordination statements and fire report
Can you please explain whether the fire report specify hand held systems 4503:2005 for new projects? and if there is an existing hand held system in the refurb projects, what happens to the hand held systems (eg hose reels)? Can they be retained?	Check whether the fire equipment is included in the buildings compliance schedule, evacuation scheme, dangerous goods requirements, HSE requirements. If not, the owner/occupier may choose to retain or not after conducting a health and safety assessment. If included, then careful consideration needs to be given. It is common for owners to remove hose reels and replace with fire extinguishers due to ease of use, maintenance costs, risk of leaks (consent for the removal is required from Council if on compliance schedule).
Have the different organisations/authors considered the costs required to fully "comply" with the PN22? The actual coordination with meetings, forms, design iterations will come at a cost.	There should be no additional costs as coordination between designers and different disciplines should be an inherent part of the project delivery. The extent of coordination and time spent on such tasks would also be relevant to the size of the project and its complexity.
has any cost/benefit analysis been carried out as to the likely percentage increase in cost of fire design hours versus the likely benefit in terms of actual identified life safety risks in actual submitted designs, which would have been picked up by using PN22?	No formal cost-benefit analysis was carried out. This was not considered necessary given the well-documented evidence, both locally and internationally, that design errors and poor coordination lead to significant downstream costs, delays, and safety risks. The update to PN22 was in direct response to concerns raised by industry practitioners. A group of relevant stakeholders was brought together to address these systemic issues by improving clarity and consistency in fire engineering practice. As highlighted in research such as the Get it Right initiative and BRANZ's review of building-quality issues, a large proportion of construction cost overruns stem from preventable design-phase errors. PN22 aims to address this by lifting design quality early, not by adding bureaucracy for its own sake.

It already is enormously expensive compared to other countries with better fire statistics and less coordination. I believe that the more coordination is being imposed in New Zealand, the poorer design and engineering itself there is, reducing the projects to pure "box-ticking". PN22 statements seem to me as just another excessive paperwork on top of already existing Producer Statements that include evidence of coordination.	If there is already sufficient evidence of coordination then we would agree that professional engineers simply 'box ticking' would not add any value to any project. However, producer statements rarely provide this. Producer Statement are not intended to include confirmation of coordination and generally don't. Their purpose to confirm compliance with the building code. PN22 statements are not intended as a formality to simply satisfy BCA requirements. Rather, PN22 serves as a critical tool to facilitate coordination between design disciplines – an essential component of achieving a compliant design and, ultimately, a successful and code-compliant construction outcome.
Speaking as a Civil Engineer, I used to providing fire supply connection to the building/s as required on my three waters plan. Are there anything else I can expect the Fire Engineer to need from me?	Possibly not but talk to your fire engineer.
Where in the legislation is "agreement" required or permission for FENZ required for consent application... it simply is not required.	Getting it right during design, avoiding variations, enabling final certification, reducing stress, avoiding rework costs, avoiding late penalty charges, are all good reasons to get the agreement up front - whether it is required for consent or not. FENZ approval is required by many standards and failure to get their agreement resulted in issues on many, many projects.
Is there an Engineering New Zealand template for the PN22 statement?	Examples are provided in the PN22 guideline, we can follow up with providing word templates.
It was mentioned that the Structural Engineer would capture fire requirements on their drawings and on the Producer Statement - PS1. Does this mean signing off against more than just B1?	No.
Does Architect issue a PN22? Who is responsible checking architectural specifications?	Yes. fire engineers and other disciplines should have an interest in the architects documentation to ensure that it has reflected their requirements. Depending on how the project is being delivered, design requirements and evidence of how those requirements has been met may be provided across various documents (plans and specifications) and so it should be expected that the different disciplines will have an interest in each other's documentation.
What if Council 'threatens' not approving the building consent until the PN22 is supplied to the BCA?	Council cannot do that. PN22 supports efficient consent processing and should support the consent and approval authority in having confidence that the design team has worked together and has coordinated the design and documentation submitted for consent. Projects that are not properly coordinated risk consenting and construction delays as well as increasing risks to all involved not least the owner of being non-compliant and potentially unsafe.
Is the PN22 extending to not only coordination, but confirm that all information in the fire report needed for construction has been communicated in other documents? From a contractors point of view, the fire report is not a construction document, but something that informs what other designers need to include, and so it is important that all construction requirements are communicated through either arch, struc, mech, or fire protection drawings.	This is a good point, and fire engineers typically state that checking architectural or structural specifications is outside their scope. I believe that the fire report is a construction document. The Sprinkler Certifier and Alarms inspectors require a copy of the consented fire report because that is what they certify/inspect against. Coordination, as outlined in PN22, is expected to all documents produced by the design team – including drawings, reports, and specifications. This ensures consistency across disciplines and supports a fully integrated and compliant building design.

Are there any guidelines on the scope of projects which require PN22 statement? I had Auckland Council request a statement for a simple office fitout recently, which seemed unnecessary in my view.	A simple office fit out can affect the compliance of egress, fire alarm travel distances, smoke detector coverage, hydrant coverage, sprinkler coverage, emergency lighting coverage, mechanical systems. I think it would be reasonable for ACC to ask the question. If it is simple, then the PN22 table/statement will be quick and easy to complete. PN22 process should serve as a prompt to consider things which might otherwise be forgotten. Many sprinkler biennial surveys pick up issues due to 'simple office fit outs' – which should have been addressed with coordination during design. This then compromises building warrant of fitness, insurances.
The burden of proof lies with the BCA. The BCA is responsible to go through the design finding evidence to satisfy themselves to that reasonable ground NOT the design team's responsibility.	Section 14D of the Building Act places the responsibility of ensuring the plans and specifications or the advice provided are sufficient to result in the building work complying with the Building Code. An effective co-ordination process contributes to satisfying this requirement. Section 14F places the requirement on BCA's to check that this has occurred. Provision of the co-ordination table facilitates this checking process enabling quicker decision making Section 49(1) of the Building Act requires building consent authority to grant a building consent if it is satisfied on reasonable grounds that the provisions of the building code would be met. These mean the BCA's role is evaluative, not investigative, it is the designer's responsibility to supply clear, technically justified, and persuasive documentation showing compliance. The "reasonable grounds" test applies to the BCA's decision-making, not to their obligation to gather evidence.
PN22 provides guidance for coordinating the building design. For existing buildings, what are the expectations on the designers to either 1) verify their design inputs so that their design is accurate and representative of the actual building being designed, or 2) provide design expectations/contingencies (on others) for what hasn't been specifically detailed?	Designs need to be based on accurate and complete information irrelevant of whether the building is new or existing. It is appropriate for designers to make assumptions but they will need to be confirmed at some point. Ultimately the documentation and design assumptions need to be confirmed before building consent applications are made. Where design inputs remain as assumptions or unknowns these should be made explicitly clear and be made so that they can be understood and agreed to as part of the design and approvals process. This is why coordination is important, not only to ensure that the documentation for consent is final and complete but also so that other disciplines can deliver a complete design and be aware of any expectations of them made by other design team members.
PN22 was first published over 13 years ago, and its use is still not popular today. BCA's can ask for it all they want but unless there is an attitude change in the industry, its status quo. What is Engineering New Zealand and BCA's doing to promote the use of the PN22? perhaps there is good reason for why the use of the PN22 is not popular?	What you are explaining is no different to many facets of the industry. Whilst cultural shifts may be necessary, coordination of building design is part of being professional.
What should the designer do if other disciplines or the contractors refuse to complete their PN22 roles and responsibilities	Explain risk to client and document what they have done and more importantly what they have not done as part of their role.
What is the liability for the fire engineer when using PN22 especially after the BECA v WCC case?	Consultants are liable if they submit alternative solutions that do not clearly meet the performance requirements, regardless of whether council accepts them. Professional reliance on practice notes (like PN22) does not protect against liability if the design is flawed or incomplete. PN22 is a guidance tool, not a compliance path in itself. It must be used with care and good professional judgment.

As others have already mentioned, has there been any cost/benefit analysis, particularly PN22 statements being additional to Producer Statements that already should contain evidence of coordination? When you compare the NZ environment to countries with better fire engineering statistics, in vast majority, they have much less coordination paperwork and more engineering.	Previously answered
"Figure 1 shows a Fire Design Process Example for a 'full service' project. Many projects do not follow this model (eg no Construction or Post-Construction activities by the designers). How do risks, roles & responsibilities etc change in this situation?"	The extent of project coordination is relative to the project size and complexity. A small simple project may only require limited coordination between disciplines with evidence of that coordination being evident by evidence such as communication and correct drawings, plans and specifications.
Additional question received in the inbox regarding Table 1 'location of evidence' column, refer below	
Comments	
Not a question but a comment: I was recently at an international fire engineering conference where many of the participants were crying out for a similar document in their jurisdictions. PN22 may not be perfect but New Zealand is way ahead of many other countries in this regard.	Thank you for this feedback
It already is enormously expensive compared to other countries with better fire statistics and less coordination. I believe that the more coordination is being imposed in New Zealand, the poorer design and engineering itself there is, reducing the projects to pure "box-ticking". PN22 statements seem to me as just another excessive paperwork on top of already existing Producer Statements that include evidence of coordination.	We agree that 'box ticking' does not add value. The coordination table is in response to that view.
Details	
What is the intention of this column? **Location of evidence**	Indicates the document that will outline the requirements?
Why is the location of evidence for fire alarm system in fire report? NZS 4512:XXXX | Design build – fire protection contractor or independent Fire System designer | Performance requirements outlined in fire report. Location of main fire panel identified | Fire Report FR YYY	The fire report states the fire alarm system type needed and what are the compliance/performance requirements needed to meet the fire safety requirements for the building. This is the basis of design for the fire systems designer. No other document is likely to state what system is needed.

Who is responsible for correctly detailing those elements, eg fire wall head detail, slab edge detail, deflection head detail etc? Also, is the fire engineer only there to check whether these details exist OR is the fire engineer expected to correct those details to his/her satisfactory, and if so, who is now liable for those details, bearing in mind fire engineers should only be responsible for stipulating performance requirements. Fire designer also spot check the details related to fire rated elements.	Who – that depends as it can be a range of persons responsibilities depending on how it is being delivered. Why should fire engineers 'only be responsible for stipulating performance requirements'? This appears to be a very narrow view of what a fire engineers role may be and what they can do. Different fire engineers have different competencies and there are different ways to deliver designs that may require different levels of involvements from different people with different skill sets.
Shouldn't arch spec include system that need to achieve the fire rating, ie intumescent paint, closed boarding or spray? **Fire protection of structural elements** Required fire resistance rating FRR 30/-/- to AS 1530.4:XXXX Fire designer: FRR is specified for different building elements. — Fire Report FR YYY. Structural designer: Fire rated structural elements and means of achieving FRR identified. Structural PS1 (B1). — Design Features Report. Structural drawings. Architectural designer: If not shown on the structural drawings, fire protection of structural elements identified — Architectural drawings	The table is a guide. If the arch spec includes the detail then it may live there. However, it may also be in other places and on other disciplines documents – that is why it needs to be coordinated and this table provides an easy way of documentation that location of the evidence. It is not a prescriptive table.