



Position Statement

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Adoption and use of AS 1851-2012

Version 1.1

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FIRE PROTECTION ASSOCIATION AUSTRALIA



Adoption and use of AS 1851-2012

Leading and supporting a professional industry to minimise the impact of fire on life, property and the environment, for a safer community

1.0 Position Statement

Australian Standard *AS 1851* has undergone extensive development and technical enhancement in recent years culminating in the release of the 2012 edition. The development process included significant consultation with key stakeholders, which has resulted in a Standard with clearly identified benefits for industry, government and the community. In recognition of the development of the Standard and the need for national harmonisation of maintenance requirements, FPA Australia's position is that:

- (i) Maintenance of fire protection systems and equipment is fundamental to system and equipment performance. The Association therefore considers that all stakeholders should adopt and use *AS 1851-2012* for the maintenance (routine servicing) of fire protection systems and equipment included in the Standard.
- (ii) Where use of *AS 1851-2012* is not appropriate or problematic due to technical or regulatory constraints, FPA Australia supports the development of alternative maintenance arrangements. Such arrangements should use *AS 1851-2012* as the starting point and only vary the specific clauses or provisions necessary to successfully undertake maintenance for a particular site.
- (iii) Existing regulation developed to require maintenance of fire protection systems and equipment should support the application of this position to encourage a nationally consistent approach.

FPA Australia contends that property owners and managers, occupiers, insurers, facility managers and the broader community will be best served through the national implementation of this position.

2.0 Introduction

This position statement establishes FPA Australia's position on the adoption through legislation and the general use of Australian Standard *AS 1851-2012 Routine Service of Fire Protection Systems and Equipment* (the Standard) as the foundation for establishing the maintenance (routine servicing) requirements for the majority of fire protection systems and equipment.

Fire protection systems and equipment are required to be in a functional state that allows them to operate at all times. Throughout the life of a building, fire protection systems and equipment may only be required to operate infrequently. However, if they fail to operate as designed, a substantial threat to occupants and property may arise. Therefore, ensuring their reliability is critical.

Undertaking regular maintenance in line with an industry wide standard is one way of enhancing the reliability of fire protection systems and equipment that benefits all stakeholders.

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3.0 Audience

This Position Statement is intended for:

- (i) FPA Australia members;
- (ii) Key stakeholders in the Fire Protection Industry including:
 - (a) Regulators
 - (b) Fire services
 - (c) Property owners and managers
 - (d) Building occupiers
 - (e) Insurance companies
 - (f) Facility managers; and
 - (g) Design consultants
 - (h) Building surveyors
- (iii) The general public.

4.0 Supporting reasons for development of FPA Australia Position

In Australia, standards can either be voluntary or mandatory. Compliance with Australian Standards (i.e. voluntary standards) is only legally required if they are referenced in regulation, legislation or in a contract. Australian Standards are developed via a respected and unbiased standards development process that ensures all competing interests are heard, their points of view considered and consensus reached.

The development process includes significant industry and community consultation. It also provides confidence to the Australian community that the current edition of a standard represents the latest 'state-of-the-art' information, technical knowledge, best practice and expertise available to industry, government and the public.

AS 1851 is the Australian Standard for maintenance (routine servicing) of fire protection systems and equipment in buildings. This standard has undergone several comprehensive revisions over the past ten or so years, the latest edition being released in 2012.

Despite substantial investment by key stakeholders in the development and refinement of *AS 1851*, the use and adoption of the current edition of the Standard (*AS 1851-2012*) as the primary reference document for carrying out maintenance of fire protection systems and equipment is generally not a legislated requirement in any Australian State or Territory. In fact, many states specifically require maintenance to be carried out in accordance with much older editions of the Standard, thereby limiting the benefits that come from relying on the latest technical knowledge and experience of the fire protection industry and other key stakeholders.

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The specific maintenance provisions vary from state to state because of the different regulatory frameworks and approaches to adoption of newer editions of the Standard. Currently in Australia each State and Territory has a unique regulatory system that governs the minimum requirements for the maintenance of fire protection systems and equipment.

Some jurisdictions have non-specific provisions that simply require the owner of a building to ensure that such systems and equipment continue to perform to a standard no less than that to which they were originally designed and implemented. In contrast, other jurisdictions have very specific and somewhat complex regulatory requirements that vary from building to building. Such regulatory requirements often reference a broad range of editions of *AS 1851* (or other standards) as a minimum maintenance requirement, some of which have been replaced by newer editions multiple times.

In principle, FPA Australia advocates that minimum regulatory requirements should simply:

- (i) Require safety measures to be maintained “fit for purpose”; and
- (ii) Require maintenance to be in accordance with a maintenance standard which will ensure original safety measure performance is being achieved; and
- (iii) Require records to be kept to demonstrate maintenance is being undertaken.

The absence of national consistency in the legislative requirements for maintenance results in, but is not limited to:

1. A reduced understanding and confusion of the technical and administrative requirements for maintenance applicable to all buildings. This confusion and limited understanding leads to:
 - (a) Extra costs on all stakeholders required to meet variations in compliance requirements that can vary from building to building or from state to state;
 - (b) The likelihood that maintenance schedules are not followed correctly, potentially resulting in scheduled activities not being completed; and
 - (c) Inconsistencies in the performance of maintenance activities which affects the reliability and effectiveness of fire protection systems and equipment.
2. Difficulties with the establishment of national training requirements
3. Challenges associated with implementing national accreditation systems for the fire protection industry
4. Lost opportunities to realise the environmental benefits contained in later editions of the Standard; and
5. An increased risk to life, property and the environment from the effects of fire due to a lack of adequate maintenance.

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Another very important issue to consider is that the legislative requirement to maintain fire protection systems and equipment throughout Australia is not restricted to building and fire safety legislation. In most states and territories, laws covering work health and safety; dangerous goods storage and handling; emergency management planning; mining; health and aged care; and marine—to name a few—include provisions which require fire protection systems and equipment to be provided to satisfy a particular risk. In most cases, these legislative instruments do not specify how an item is to be maintained.

Generally speaking, it is likely that an individual or a corporation—such as the owner, occupier, employer or manager—will have a common law duty of care to maintain fire protection systems and equipment to demonstrate that they have met their duty to others under their supervision or care.

A Duty of Care is typically described as a requirement that a person act toward others and the public with watchfulness, attention, caution and prudence that a reasonable person in the circumstances would. If a person's actions do not meet this standard of care, then their actions are considered negligent, and any damages resulting may be claimed in a lawsuit for negligence.

Maintaining fire protection systems and equipment to *AS 1851-2012* can be one of the surest ways of demonstrating that a negligent act has not occurred. Therefore, by applying *AS 1851-2012*, the person is likely to have satisfied their duty of care in regards to their actions towards others and the public.

If *AS 1851-2012* is not used, the owner, occupier or service provider may have to satisfy themselves that they have a sound reason for not adopting current standards. Legal advice provided to FPA Australia confirms this. The following is a modified extract of the legal advice provided to FPA Australia when the previous edition (*AS 1851-2005*) was released:

“The recent release of the new Standard (AS 1851-2005) raises the need for building owners, building occupiers and essential service providers to assess and consider the applicability of this new standard to their particular circumstances. This consideration must take into account the relationship between these parties in a contractual sense as well as in tort and other legislative requirements. In a greater sense the building owners, occupiers and essential service providers must also consider their relationship with the community and the obligations owed to ensure adequate protection of property and life as required specifically by the Building Code of Australia and the common law.

This new Australian Standard must be considered to be the most recent benchmark for maintenance of Fire Protection Systems and Equipment. As such the building owner, building occupier and essential service provider must determine whether by not adopting the new standard they may be considered to be negligent.”

Although Australian Standards are not always referenced by regulation, they are often considered “quasi regulations” and can be persuasive in a court of law as they can be taken as being recognised as acceptable industry and community standards. As fire protection is a matter of public necessity, it is incumbent on building owners and occupiers to determine whether, in their

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particular circumstances, they can perform both their public duties and meet legislative requirements without adopting *AS 1851-2012*.

The evolution of *AS 1851* into the 2012 edition therefore validates the need for property owners and managers, corporate property trusts, insurers, facility managers, corporate risk managers and others to consider using and adopting the latest edition of the standard. It also raises the need for regulators to streamline their respective legislative systems so that the requirement to maintain fire protections systems and equipment is simple, effective and well understood.

5.0 Implementation and effect of FPA Australia's position

FPA Australia considers that adoption and use of *AS 1851-2012* will:

- (a) satisfy the minimum regulatory objectives for maintenance stipulated by State and Territory governments by ensuring that installed fire safety systems and equipment can be demonstrated to be fit for purpose; and
- (b) support the fulfilment of a common law duty of care, where one exists; and
- (c) satisfy other legislated obligations— such as those contained in work health and safety legislation—that require an owner, employer or other responsible entity to ensure where practicable a safe environment in the event of a fire initiated emergency,.

FPA Australia is cognisant that there may be circumstances where adoption and use of *AS 1851-2012* may not be entirely practicable. This may be due to specific regulatory requirements or individual site specific concerns including alternative solutions based on fire safety engineering designs.

Based on this recognition, the Association supports provisions that allow for an alternative maintenance solution to be developed on a site by site basis to determine an appropriate maintenance regime for a specific building or site.

Further guidance on the adoption and use of *AS 1851-2012* with particular reference to specific state and territory regulatory requirements and the establishment of alternative maintenance solutions will be published in a future FPA Australia Good Practice Guide. Additionally, information on the specific legislative requirements for maintenance for each state and territory will be made available in the form of FPA Australia Reference Documents.

In regards to regulatory reform and the need to have a nationally consistent approach, FPA Australia recommends that Federal, State and Territory legislative requirements for maintaining fire protection systems and equipment should be harmonised to achieve the following outcomes:

- (a) A direct or indirect reference allowing maintaining of fire protection systems and equipment to be in accordance with the most recently published edition of Australian Standard *AS 1851*.

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- (b) The ability for an authority having jurisdiction or other appropriate entity to develop an alternative solution for the maintenance requirements for an individual building or site. Where an alternative solution is implemented, it should use *AS 1851-2012* as the starting point and only vary specific clauses or provisions necessary to successfully undertake maintenance for that particular site.

6.0 Benefits to Industry, Government and Community

Standardising the requirement to maintain fire protection systems and equipment across the country to a single national standard will result in significant economic, social and environmental benefits to industry, government and the community. The benefits likely to be realised through implementation of the Association's position are outlined in the following sections.

6.1 Learning from collective experience and expertise

Standards Australia FP-001 Committee - *Maintenance of Fire Protection Systems and Equipment* consists of representatives with broad exposure to the fire protection industry and include technical experts in fire protection systems and equipment, regulators, industry associations, unions, property managers and owners, fire brigades and government departments with significant property interests.

This collective group of people has a responsibility to investigate, evaluate and analyze emerging industry trends, deficiencies in current standards and practices, public safety outcomes and cost benefit to key stakeholders when proposing modifications to the Standard.

The development process of Standards Australia also involves extensive public consultation that presents an opportunity for the broader community to make submission to the FP-001 Committee to ensure a balanced representation of the views of all stakeholders is considered.

Standards Australia and the development of consensus based documentary standards forms part of Australia's standards and conformance infrastructure established by the Commonwealth Department of Innovation, Industry, Science and Research. Standards and conformance are the backbone of everyday life. They give confidence to consumers, certainty to business, and support consistent and reliable delivery of services.

Adopting *AS 1851-2012* therefore ensures that all stakeholders benefit from the experience gained by those who apply and work with Standards on a regular basis as well as the foremost technical experts from the fire protection industry.

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6.2 Cost savings for business

Adoption of *AS 1851-2012* is likely to result in cost savings for all stakeholders who have an obligation to undertake maintenance. Cost savings incorporated in the standard include:

1. A reduction in the frequency of certain activities. This is particularly relevant to those activities that were previously conducted at very high frequencies, such as weekly inspection and testing. An example of this is the move from weekly scheduling of inspection and testing of automatic fire sprinkler systems in favour of monthly scheduling. This single change has reduced the number of scheduled visits per year from 52 visits to just 12 visits; and
2. Additional preventive maintenance activities which reduce the likelihood of more expensive repairs having to be carried out. The emphasis is on early detection, which allows fault to be rectified before the problem escalates and requires expensive repairs to be performed or necessitates replacement of the equipment.

In addition to the cost savings that are incorporated directly in the Standard, adoption and use of *AS 1851-2012* may also deliver cost savings arising from:

1. The streamlining of maintenance scheduling and records management systems as well as training and development of systems of work for fire protection companies. The present need to develop complex systems to facilitate maintenance being carried out to multiple standards across jurisdictions and amongst building stock adds to the overall cost of providing maintenance services.
2. The elimination of the need for owners, property managers and other stakeholders to maintain knowledge of the requirements of multiple editions of the Standard as they apply to different buildings. This includes the development of record keeping and management systems that account for iterations of previous editions of the Standard.
3. The removal of the need for fire protection companies—and in some cases individual businesses—from having to maintain copies of superseded editions of the Standard

The above cost savings will benefit all stakeholders involved in the maintenance of fire protection systems and equipment. The savings may be realised either through direct cost savings as a result of the streamlining of systems and procedures to align to a single edition of the Standard or through the lowering of charges levied by fire protection companies who will benefit from the improvements in efficiency and productivity.

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It should also be noted that the adoption and use of *AS 1851-2012* will not trigger the retrospective upgrading of systems or equipment resulting from the application of a different maintenance regime to the one that traditionally applied to the building or site.

6.3 Training development and delivery

The Construction and Property Services Industry Skills Council (CPSISC) defines industry standards for the fire protection equipment sector. CPSISC has developed nationally recognised units of competency that define the knowledge and skills of those involved in the maintenance of fire protection systems and equipment. Together these units of competency form a training package. Training providers throughout Australia invest significant time and money in developing course materials and providing training and assessment services to support the CPSISC training packages.

The units of competency identified by CPSISC as meeting the industry requirements acknowledge that Australian Standards are frequently revised. Compliance with some of the units of competency requires training providers to integrate the requirements of the most recent edition of *AS 1851* in to their training and assessment materials.

The development of training aligned to *AS 1851-2012*, allows participants to hone their skills and knowledge in respect of a single process for performing maintenance and consequently build expertise as they put these skills and knowledge into practice.

In this respect, having multiple editions of the Standard in force at any one time in multiple jurisdictions creates an impediment to good learning practices. Training materials and training providers inevitably do not consider the requirements of older standards and therefore course participants are unlikely to develop the skills and knowledge to carry out maintenance in accordance with the myriad of editions that may be applicable at any given time.

Adoption of *AS 1851-2012* coupled with the alignment of training to the Standard will increase the skills and knowledge of individuals working in the fire protection industry. This will result in a more professional industry that will see service providers perform activities more consistently and with greater skill and knowledge and thereby provide greater surety that fire protection systems and equipment will perform as and when required.

6.4 Accreditation and Licensing

Regulation of individuals undertaking maintenance (routine servicing) of fire protection systems and equipment is generally unregulated with the exception of some jurisdiction based schemes.

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AS 1851-2012 states that “routine service of fire protection systems and equipment shall be conducted by competent persons.” A competent person is defined as “a person who has acquired through training, qualification, experience, or a combination of these, the knowledge and skill enabling him/her to correctly perform the required task.”

FPA Australia is progressively developing a national contractors accreditation scheme to establish the minimum qualifications, knowledge and skill necessary to provide services in a range of roles across the fire protection industry including maintenance.

The proposed FPA Australia accreditation scheme rely on the training materials developed specifically for contractors performing maintenance of fire protection systems and equipment. As discussed in section 6.3 of this document, these training materials evolve over time by drawing on the information contained in the latest edition of AS 1851.

The various licencing and accreditation schemes provide business and the community with confidence and assurance that their safety and the protection of their property is a priority. Establishing national consistency in respect to contractor accreditation as result of harmonisation of maintenance requirements will improve the integrity and reliability of all licensing and accreditation schemes and will lead to improved professionalism and consistency throughout the fire protection industry.

6.5 Common Law obligations

The legislative requirement to maintain fire protection systems and equipment throughout Australia is not restricted to building and fire safety legislation. In most states and territories laws covering work health and safety, dangerous goods storage and handling, emergency management planning, mining, health and aged care and marine to name a few; include provisions which require fire protection systems and equipment to be provided to satisfy a particular risk. In most cases these legislative instruments do not specify how an item is to be maintained.

Generally speaking it is likely that an individual or a corporation such as the owner, occupier, employer or manager will have a common law duty of care to maintain fire protection systems and equipment to demonstrate that they have met their duty to others under their supervision or care.

A Duty of Care is defined as “a requirement that a person act toward others and the public with watchfulness, attention, caution and prudence that a reasonable person in the circumstances would.” If a person's actions do not meet this standard of care, then the acts are considered negligent, and any damages resulting may be claimed in a lawsuit for negligence.

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Maintaining fire protection systems and equipment to *AS 1851-2012* can be one of the surest ways of demonstrating that a negligent act has not occurred. Therefore the person is likely to have satisfied their duty of care in regards to their actions towards others and the public.

6.6 Auditing and quality control

The role of regulators and other authorities who undertake audits to ascertain compliance with legislated maintenance requirements is further complicated as a result of the multitude of editions of the Standard referenced by State legislation. The same applies to owners and property managers who have property portfolios that contain sites in different jurisdictions.

The adoption of *AS 1851-2012* will reduce costs for regulators and building owners or their agents that arise from having to maintain their knowledge of the different editions of the Standard and the development and upkeep of multiple editions of auditing and quality control documentation.

6.7 Flexibility of application

AS 1851-2012 provides a high degree of flexibility in that it can be appropriately applied to virtually all fire protections systems and equipment irrespective of the year of manufacture or the design and operation of the system or equipment.

Examples of where flexibility in applying the provisions of the Standard may be appropriate include situations where:

1. a custom designed or engineered system has been installed as part of an alternative solution and the system requires a different maintenance regime, such as changes to specific activities or frequency schedules; or
2. there is an enhanced risk of failure of an item or system due to environmental factors or the type of occupancy; or
3. an enhanced level of risk to the occupants exists due to the use, complexity and age of the building; or
4. the site is remotely located to the extent that the likelihood of achieving the scheduled frequencies specified in the Standard due to the tyranny of distance is low.

The degree of flexibility achieved by allowing for variations to *AS 1851-2012* based on a site by site evaluation and assessment will benefit those sites where it is not appropriate or difficult to apply the relevant provisions of the Standard.

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6.8 Minimising errors in scheduling of activities

The adoption of various editions of the Standard, particularly where such variations exist in the one jurisdiction can lead to errors and omissions in the scheduling and performance of maintenance activities. The result of these errors and omissions could include an increase in risk to life and property resulting from poorly maintained fire protection systems and equipment.

6.9 Environmental benefits

In addition to the financial benefits identified above, *AS 1851-2012* reduces the environmental impact associated with conducting maintenance activities on fire protection systems and equipment. The environmental benefits include water savings and minor reductions in greenhouse gas emissions.

Each year, millions of litres of water go to waste during the testing of fire systems such as fire sprinklers, fire hydrants and fire hose reels. Determining an adequate flow of water through these systems is an essential part of demonstrating their performance and their ability to operate as designed.

Water is a precious resource and recent climatic events across Australia have resulted in substantial funds being invested in water saving initiatives such as limiting leakage in towns mains through to expensive desalination plants.

Whilst water usage when testing fire protection systems is an unavoidable requirement, *AS 1851-2012* includes a range of measures to reduce as much as possible the amount of water going to waste. As an example, it is estimated that changing from weekly sprinkler testing (required by *AS 1851-2005* and earlier editions) to monthly sprinkler testing (required by *AS 1851-2012*) for systems that include on site fire pumps could reduce water usage per annum by a minimum of 14,000 litres*.

Minor reductions in greenhouse gas emissions are also achievable through adoption of *AS 1851-2012*. The reduction in emissions can be achieved from changes in frequency that results in less vehicle movements by contractors having to travel from their base to the building as well as less frequent operation of combustion engine or electrical driven equipment such as fire pumps.

**Source: Standards Australia Handbook HB233-2008 Fire Protection Systems Testing – Water Conservation Handbook*

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6.10 Enhanced life safety and property protection outcomes

The changes incorporated in the most recent edition of the Standard will result in an improvement in the reliability, integrity and performance of fire protection systems and equipment.

These improvements lessen the chance of fire protection systems and equipment failing to perform as designed and installed, thereby enhancing the protection of life, property and the environment from the effects of fire.

Adopting other maintenance regimes could potentially increase the chances of equipment failure due to testing equipment beyond its design criteria or through insufficient testing. As a community, it is critically important that we utilise the collective experience, research and knowledge from a broad range of stakeholders and embrace opportunities to improve business practices that ultimately result in improved community safety outcomes.

6.11 Technical changes included in *AS 1851-2012*

AS 1851-2012 builds on the consolidation and alignment of activities that first appeared in the 2005 edition. The Standard also includes changes to the reporting and recording of activities to assist with adoption into existing regulatory frameworks. Important changes in *AS 1851-2012* include:

- The critical appraisal and refinement of the routine service technical requirements in light of field experience and studies including requirements for battery load testing, detector sensitivity testing and system interface testing.
- The consolidation of sections and consistency across sections, for the fire alarm, special hazards and mechanical services making it easier for the responsible entity and service provider to implement the Standard.
- A thorough overhaul of the general requirements of Section 1 to remove administrative requirements and avoid regulatory conflict.
- Tables in Sections 2 to 14 changed from type based to frequency based and with the yearly service separated from the supportive routine service schedules.
- Clarification of the role of commissioning and baseline data as part of the approved design.
- Critical defects, non-critical defects and non-conformances better distinguished and better defined.
- Sections 6 to 10 in the 2005 edition—covering fire detection, alarms, sound systems and intercom systems—have been combined in a new Section 6 with

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the previous Section 8 (Fire alarm monitoring) being removed in this revised document.

- A new Section 5 that covers water storage tanks for fire protection systems to address the new design standard, *AS 2304*.
- Sections 11 in the 2005 edition (Gaseous fire extinguishing systems), 12 (Fixed aerosol systems) and 13 (Water mist systems) have been combined in a new Section 7 (Special hazards).
- Several new appendices that expand on Section 1 content, such as, baseline data and systems interface testing, including normative appendices for battery capacity testing and fire detector testing.
- Extensive detail on mechanical services included in the normative section in the 2005 edition has been relocated in two appendices, both informative.

7.0 References

1. *AS 1851-2012 Routine service of fire protection systems and equipment*, published by Standards Australia, December 2012.

8.0 Disclaimer

The opinions expressed in this correspondence reflect those of FPA Australia however are subject to change based on receipt of further information regarding the subject matter. You should interpret the technical opinion or information provided carefully and consider the context of how this opinion / information will be used in conjunction with the requirements of regulation (state and/or federal); relevant standards, codes or specifications; certification; accreditation; manufacturer's documentation and advice; and any other relevant requirements, instructions or guidelines. FPA Australia does not accept any responsibility or liability for the accuracy of the opinion / information provided, nor do they accept either directly or indirectly any liabilities, losses and damages arising from the use and application of this opinion / information.

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