



Animal Welfare Institute

900 Pennsylvania Avenue, SE, Washington, DC 20003
awionline.org phone: (202) 337-2332 fax: (202) 446-2131

May 13, 2014

Dawn Bellis Secretary
Standards Administration
National Fire Protection Association
1 Batterymarch Park
Quincy, MA 02169

RE: NFPA 150, Standard on Fire and Life Safety in Animal Housing Facilities

I am writing on behalf of the Animal Welfare Institute (AWI) and our supporters to urge the National Fire Protection Association (NFPA) to amend its *Standard on Fire and Life Safety in Animal Housing Facilities* (NFPA 150), to require sprinklers and smoke control systems in all newly-constructed housing facilities for Category B animals. The sprinkler system requirement we ask for here should not be applied to newly built housing facilities for Category B animals that provide the animals with ready access to pasture, as these facilities provide an equivalent alternative to protect animals.

Since its founding in 1951, AWI has been dedicated to reducing animal suffering and promoting the welfare of all animals, including animals used in agriculture. As a part of our mission, we promote humane farming systems and work to improve the conditions of animals living on farms. Encouraging fire prevention strategies for Category B animal housing facilities falls within AWI's mission, as such strategies have the potential to stop the needless suffering of animals. For the following reasons, it is critical that NFPA require smoke control and sprinkler systems in new housing facilities for Category B animals with the above exception.

Installing smoke control and sprinkler systems in all new animal housing facilities for Category B animals will allow NFPA to uphold the expressed purpose of NFPA150: to "prevent the loss of animal life, human life, and property from fire or other emergency by providing the minimum requirements for the design, construction, operation, and maintenance of facilities where animals are housed." Millions of animals die due to preventable fire- and smoke-related injuries each year. Already in 2014, over 450,000 animals have died from fires that could have been prevented with smoke control and sprinkler systems.¹

NFPA itself has acknowledged that smoke control and sprinkler systems reinforce NFPA150's objective, as it requires that they be used for Category A animals. Logic dictates that, in order to adhere to the policy's expressed purpose, NFPA must mandate the same measures to prevent loss of life for Category B animals. This is particularly important for Category B animals because the potential for loss of life is extraordinary—nine billion land animals included in Category B are raised for food in the United States each year, often within facilities in which they are housed together by the thousands.

Requiring sprinklers and smoke control systems will also allow NFPA to treat facilities in a consistent manner and to provide better guidance for authorities. As you are aware, NFPA150 originally only

¹ Matt Voigts, *150,000 Hens Killed in Fire at Egg Facility*, The Des Moines Register (Mar. 31, 2014) available at <http://www.desmoinesregister.com/story/news/2014/04/01/egg-facility-fire-kills-chickens/7146895/>; *Thousands of Chickens Dead in Egg Farm Fire*, WISN (Feb. 1, 2014) available at <http://www.wisn.com/news/south-east-wisconsin/racine-kenosha/firefighters-battle-fouralarm-fire-at-egg-fire-in-walworth-county/24231496>.

covered racetrack stables, but in 2004 it was expanded to cover all types of animal housing facilities. NFPA made these changes in order to give “better guidance to authorities and consistent treatment of facilities from jurisdiction to jurisdiction.” Failure to require smoke detectors and sprinkler systems for Category B animals runs contrary to this statement of purpose.

Contrary to the claims of industrial agriculture interests, producers would benefit from the implementation of smoke control and sprinkler systems, as these preventative measures could significantly reduce their expenditures for property damage. A fire can result in hundreds of thousands of dollars in damage to a single operation. From 2006 to 2010, fires caused approximately \$28 million annually in property damage alone.² Preventative measures not only cost far less compared to significant fire damage, but also help producers save money by reducing insurance costs, increasing tax deductions, avoiding liability, and conducting regular business without disruption.³

In addition to savings for producers, the implementation of smoke control and sprinkler systems may reduce costs to taxpayers. Requiring smoke control and sprinkler systems could reduce the resources required by fire departments for extinguishing fires that could have been contained or prevented. Last month, a single fire in Minnesota destroyed several structures and drew firefighters from almost a dozen fire departments.⁴ Thirteen tanker trucks made repeated trips to stifle the blaze.⁵ Simply requiring that such facilities be equipped with smoke control and sprinkler systems will help to prevent such catastrophic fires and taxpayer expense in the future.

Most critically, smoke control systems and sprinklers in newly-constructed Category B animal housing facilities will significantly reduce the risk of death and injury to animals, civilians, and firefighters. Farm facilities often house highly flammable and combustible materials such as fertilizer, hay, and pesticides. These substances allow fire to move quickly and spread throughout housing structures and are difficult, if not impossible, to enclose in a small area. Millions of animals have died excruciating deaths this way, and civilians and firefighters have been injured or killed by barn fires. Employees would have more time to get themselves and animals to safety if preventative measures were required. Early detection of fires through smoke control and sprinkler systems also gives firefighters more time to contain fires, which in turn decreases the resulting harm to animals, people, nearby buildings, and the environment.

For all of the stated reasons we respectfully urge you to require smoke detector and sprinkler systems in all new housing facilities for Category B animals unless within the above exception. Thank you for your time and for considering the importance of preventative fire measures to protect animals from agonizing deaths. I would be happy to provide you with more information at your request. You can contact me at michelle@awionline.org or 202-446-2147.

Sincerely,



Michelle Pawliger
Farm Animal Policy Associate

² *Structure Fires in Barns Fact Sheet*, NFPA available at <http://www.nfpa.org/~media/Files/Research/Fact%20sheets/barnsfactsheet.pdf>.

³ *Fire Sprinklers Save Lives and Money... The Economics of Retrofit*, Kenneth E. Isman, P.E. available at <http://www.firemarshals.org/pdf/F2%20-%20FIRE%20SPRINKLERS%20SAVE%20LIVES%20AND%20MONEY.pdf>

⁴ *Fire Destroys Buildings, Kills Livestock*, Bell Plaine Herald, March 28, 2014 available at <http://belleplaineherald.com/main.asp?SectionID=7&SubSectionID=39&ArticleID=3778>.

⁵ *Id.*