Health and Safety Executive

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Reference
HSE Letter 27.05.2026
Fixed Firefighting Systems

27th May 2026

Dear Kate,

HEALTH AND SAFETY AT WORK ETC ACT 1974

Please see the following message from the HSE to industry. I would be grateful if you could discuss and share with your members and more widely. I am also writing to SafetyOn and OEUK.

HSE has become aware that some windfarm developers /operators /OFTOs are not ensuring that inert gas fire suppression systems have been isolated before people enter rooms protected by these systems.

Inert gas systems are designed to protect assets in case of fire. They are not safe for activation with humans present due to the risk of asphyxiation, which could lead to unconsciousness and death.

A time delay does not ensure that the system is inherently safe, as has been claimed by some suppliers. Systems can also be triggered due to human error, a system or equipment fault.

HSE plans to challenge statements in BS EN 15004-1 that levels of oxygen as low as 12% have no adverse effects on humans, and that systems designed to reduce oxygen to 10-12% do not require a lock off arrangement.
HSE is also considering options for a formal safety alert.

In the meantime, we are drawing your attention to the Approved Code of Practice (L101) for the Confined Space Regulations 1997:

> Oxygen deficiency and oxygen enrichment
> 60 There are substantial risks if the concentration of oxygen in the atmosphere varies significantly from normal (ie 20.9%). For example, oxygen enrichment will increase flammability of clothing and other combustible materials. Conversely, a relatively small

reduction in the oxygen percentage can lead to impaired mental ability, and can adversely affect others with pre-existing medical conditions such as respiratory infections, asthma etc. The effects are very rapid and generally there will be no warning to alert the senses. This can happen even in circumstances where only a person's head is inside a confined space. Very low oxygen concentrations (ie below 16%) can lead to unconsciousness and death. Any difference in oxygen content from normal should be investigated, the risk assessed, and appropriate measures taken in the light of the risk.

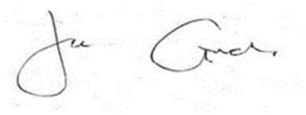
61 Particular care should be taken in environments created with a specifically reduced oxygen concentration in the atmosphere produced by removing oxygen or increasing concentration of another gas, usually nitrogen (a hypoxic environment). This should include restrictions on access and alarm systems to alert workers when oxygen limits drop below a safe limit.

Also in para 156 about firefighting in confined spaces:

Inert gas flooding of the confined space must not take place when people are within the space.

HSE will consider using prohibition notices to prevent work in rooms without prior isolation of inert gas fire suppression system.

Yours sincerely



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