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1 **Maximum Allowable Damage approach to fire safety performance quantification**

2 Jaime E. Cadena^{a*}, Martyn McLaggan^b, Andres F. Osorio^c, Jose L. Torero^d, David Lange^e

3 ^aThe University of Queensland, Crn Staff House rd, St Lucia, QLD, Australia, je.cadena@uq.edu.au

4 ^bThe University of Sheffield, Sheffield S1 3JD, United Kingdom, m.s.mclaggan@sheffield.ac.uk

5 ^cThe University of Queensland, Crn Staff House rd, St Lucia, QLD, Australia, a.osorio@uq.edu.au

6 ^dUniversity College London, Gower Street, London, UK, j.torero@ucl.ac.uk

7 ^eThe University of Queensland, Crn Staff House rd, St Lucia, QLD, Australia, d.lange@uq.edu.au

8 *Corresponding author, je.cadena@uq.edu.au

9

10 **Keywords:** fire performance quantification, fire risk assessment, risk acceptance, probabilistic risk
11 assessments

12 **Abstract:**

13 Risk assessments are used to inform decision-making in hazardous systems. The process involves highly
14 technical steps such as quantifying uncertainty and it is typically carried out by subject matter experts with
15 a robust engineering background. The process also involves value-loaded steps such selecting the risk
16 acceptance criteria for evaluating the risks. In the built environment, risk assessments support performance-
17 based design and of late, these have been increasingly framed as the preferred option to quantify and
18 demonstrate adequate fire safety performance. This argument is supported by the assumption that risk is an
19 adequate proxy for fire safety goals. The present work puts forward a counterargument, stating that fire
20 safety performance should be mainly defined as a function of fire consequences, avoiding the use of fire
21 risk assessments as a proxy to fire safety goals. An alternative fire risk assessment methodology is
22 introduced based on the concept of maximum allowable damage, which is exemplified in a combustible
23 façade residential building case-study. The methodology presented here aims at building upon the
24 knowledge and tools of fire safety engineering to obtain more trustworthy risk assessments and therefore
25 attain a safer built environment.

26 **1 Introduction**

27 The application of Fire Safety engineering (FSE) to the development of performance-based fire safety
28 design has emerged, in the last four decades, as an alternative for building and infrastructure designers to
29 move away from compliance based on adherence to rule-based (prescriptive) construction codes towards
30 compliance based on evidenced performance [1]. Performance-based assessments can be typically done
31 employing deterministic or probabilistic methods [2]. In FSE, as in other engineering disciplines dealing
32 with complex problems, deterministic methods focusing on phenomenological modelling have been found
33 to be lacking in: precision, certainty, robustness and completeness [3]. Thus, the limitations of deterministic
34 methods have encouraged the use of probabilistic assessments. Responding to this, performance-based
35 guidelines for FSE identify probabilistic risk assessments (PRAs, also known as probabilistic safety
36 assessments – PSAs or quantitative risk assessments - QRAs) as a possible tool that can be used to
37 demonstrate acceptable performance. Watson [4] provides a comprehensive analysis of what probability
38 represents in the context of a PRA, based on the different accepted theories of probability. None of those
39 theories support defining probability as an indisputable source of truth. Instead, Watson concludes that
40 under the limitations imposed by the existing theories of probability, PRAs' output should be handled not
41 as proof of safety for compliance (using a pre-determined risk threshold), but as one element of evidence
42 that can inform relevant stakeholders in order to make a decision, e.g. choosing a design alternative.
43 Therefore, PRAs can be used to identify hazard scenarios, to produce risk metrics for specific failure modes
44 and to estimate consequences. These variables will then serve to inform decision making.

45 The performance of infrastructure in the event of a fire depends on building design and variables associated
46 to its purpose and use such as fuel load. Performance is also dependent on the fire safety features
47 implemented during the design and build. Therefore, the response of infrastructure strongly depends on all
48 these elements. Failure modes triggered by fire effects and the associated reliability data of fire safety
49 measures are extremely difficult to capture as they depend on periodic inspection, maintenance and testing.
50 For fire safety engineering design, reliance on these ongoing processes after handover is fraught with
51 complexity. As concluded by Hackitt [5] and Shergold-Weir [6] when reviewing fire safety in the building
52 sectors in the UK and in Australia, respectively, these activities are often not ensured by current FSE design
53 approaches or regulatory frameworks. Thus, the information extracted from a PRA has to be caveated by
54 all these issues and interpreted in a careful and bespoke manner. Nevertheless, a common approach to
55 overcome the challenges of implementing a PRA is to adopt a mechanistic and highly structured approach,
56 a sort of recipe. Such a mechanistic use of PRA's to demonstrate compliance, rather than to inform all
57 relative stakeholders [7], could therefore unintentionally direct FSE practitioners to misuse this tool. This
58 would perpetuate the issues identified by Hackitt [5] and Shergold-Weir [6].

59 Whether deterministic or probabilistic, risk assessments are typically undertaken as a positivist endeavor,
60 implying that 1) problems are tractable and 2) a 'true' underlying value of risk exists. Due to the inherent
61 limitations of all models, subjectivity and biases are unavoidably embedded in risk assessments, just as
62 value judgments are prompted by their results when reviewed by decision-makers. Whether a 'true' value
63 exists or not, it is not feasible to determine, starting with the fundamental issue of what 'risk' means. In the
64 context of FSE, biases and subjective judgments play a key role in defining architectural and structural
65 features of a building as well as the fire protection features incorporated, i.e. they influence the future fire
66 safety performance. Such an influence cannot be eliminated but should be considered and managed through
67 the risk assessment process in order to propend towards a safer built environment. This poses two problems:
68 defining what we mean when we talk about 'risk' and defining whether the risk assessment will be
69 approached within a positivist or a constructivist framework. Solberg and Njå [8] make it clear that risk is
70 a concept that allows us to choose from a myriad of possibilities that can be realized depending on our
71 choices, but it does not exist on its own and require interpretation, i.e. it is inherently subjective. In practical
72 terms, each individual or organization needs to define how they judge and choose the possibilities
73 associated to a range of choices, i.e. define what risk means to them. The authors believe that a reasonable
74 starting point is understanding risk as a function of possibilities (scenarios), the uncertainty associated to
75 them being realized (chance) and the effects these produce on something of value (consequences),
76 underpinned by the available knowledge of those involved in assessing risk (assessor's knowledge); this is
77 very much aligned with the definition put forward by Aven [9], which was originally proposed by Rosa
78 [10]. The latter problem has been a part of the rich and complex discussions about the philosophy of science,
79 which are beyond the scope of this manuscript. Defining the preferred framework to work is a task of the
80 stakeholders, albeit informed by knowledgeable assessors, realizing that ultimately there is no 'right'
81 framework. Taking a pragmatic perspective in the context of fire safety engineering, a positivist approach
82 as previously mentioned is well suited for individuals and organizations dealing with well-defined problems
83 that can be decomposed into simpler problems which can be addressed individually to then obtain an overall
84 answer. This approach is meant to be free of subjective judgments and uses the scientific method as its
85 bastion. However, reality is far from being free of subjectivity and value judgments, and the process of
86 making judgments about choices and possible resulting futures (i.e. risk assessment) is not an exception
87 even when the 'ideal' assessors are engaged (who is an ideal assessor?). Fire safety engineering cannot be
88 free of value judgments as the choices it identifies and recommend following can have major consequences
89 on all stakeholders, including building occupants and society more widely. Removing all value judgments
90 from fire safety engineering would put the practice in a fictitious context where the consequences of a
91 choice will not be fully understood. Therefore, the authors recognize that even when fire risk assessments
92 are carried out from a strictly positivistic approach, their outcomes need to be interpreted through a
93 constructivist lens. Doing this is also beyond the scope of this paper, yet some of the elements introduced
94 in the methodology that will be proposed are tools to facilitate the necessary value judgments.

95 In considering the need to weigh in these value judgments and the inherent limitations associated to
96 modelling fire behavior, an alternative fire risk assessment methodology is proposed in this manuscript.
97 The methodology, namely the Maximum Allowable Damage (MAD), provides a framework to construct a
98 representation of fire performance and judge whether it is acceptable or not. In doing so, MAD seeks to
99 identify, and effectively communicate, the important subtleties of fire safety engineering assumptions and
100 their potential impact on overall fire safety. Importantly, MAD was conceived as a consequence-driven risk
101 assessment methodology which focusses on the inherent risk of a building as a means of drawing attention
102 to the consequences of a fire as opposed to the likelihood.

103 In order to capture the subtleties of the assumptions underlying fire risk assessments, MAD introduces two
104 key concepts Strength of Knowledge (SoK) and insensitivity. Strength of Knowledge (SoK), introduced by
105 Khorsandi and Aven [11] in the context of risk assessments for Nordic oil & gas operations. SoK is used in
106 MAD as a tool to identify robust assumptions that are likely to hold throughout a building's life cycle, as
107 well as those that do not. The latter are of particular concern as they could lead to poor fire safety
108 performances and endanger occupants and property. Is insensitivity, or the inverse of sensitivity, judges
109 how easily the quantified fire safety performance changes in response to changes in a particular input. The
110 combination of these two concepts provides a powerful tool to screen out assumptions and inputs that
111 require further support through either research or more detailed consideration.

112 Section **Error! Reference source not found.** details how the subtleties of fire safety engineering might not
113 easily be captured by PRA despite its robust methodology. These limitations are used as a basis to formulate
114 a path forward for fire risk assessments (section **Error! Reference source not found.**). With this pathway
115 in mind, MAD (section 4) is put forward as a potential methodology that focuses on understanding the
116 damage potential of a fire and evaluating it against a consequence acceptance criterion. This novel approach
117 is exemplified through a comprehensive implementation to a case-study with highly topical and challenging
118 components, a high-rise residential building with a combustible façade (sections 5 and 6). Finally, the
119 authors reflect on the limitations of the status quo for fire risk assessments and a set of conclusions (section
120 7).

121 2 Deterministic analyses

122 A deterministic analysis is one in which the same inputs will always produce the same outputs. It is
123 characterized by using fixed quantities for the inputs, in lieu of ranges or probabilistic distributions which
124 are to be sampled either in a structured or a random way. A deterministic approach requires selecting fixed
125 values for variables and parameters which might have varying degree of supporting knowledge and
126 represent different degrees of conservatism. Thus, the fixed variables can be boundaries within a range,
127 conservative or characteristic values. These fixed values could be seen as a conservative sample from a
128 probabilistic distribution, but they are explicit and can be challenged openly. This is not the case with inputs
129 for probabilistic analyses using stochastic quantities. In the context of safety science, deterministic analyses
130 are employed to gain detailed insight on the consequence component of risk [12]. This is consistent with
131 the need to understand and manage consequences in FSE.

132 There are parameters and variables in the context of FSE for which the possible range of values is unknown.
133 Such situation would trigger the need for developing further knowledge, for example through research. In
134 cases where the ranges are known, it is a challenge to choose what value is conservative or onerous enough.
135 However, a risk assessment is not concerned with selecting a 'correct' value, but with gaining useful insight.
136 It is the process of understanding the system at hand, selecting conservative values (where needed) and
137 iterating them as required that produces useful insight. This is exemplified later on in the case study (section
138 6), where feasible and onerous values are not necessary given an already unacceptable performance.

139 As discussed in detail by Paté-Cornell [13], deterministic analyses focused on consequences can provide
140 adequate support, particularly when the range and probability distribution of key variables are unavailable,
141 as is often the case in Fire Safety. Both in probabilistic and deterministic analyses, it should not be the point
142 to run the analyses for its own sake, but to gain insight and this is only feasible by understanding the inputs

143 and their values, as well as the underlying assumptions and the models used. Therefore, a deterministic risk
144 assessment could help describe the possible upper limit for consequences in a particular risk.

145 Deterministic analyses are the basis for implementing an inherently safe design. Trevor Kletz proposed this
146 concept for chemical process safety, having the minimization of the consequences as the main design driver.
147 In inherently safety design, the specification of the design parameters and operating conditions are done as
148 a function of the consequences, if the consequences are unacceptable the best solution might be removing
149 the hazard from the process. Such an approach decreases the reliance on additional layers of protection and
150 their timely and effective action. Gomez et al. [14] provide a simple example of this design philosophy for
151 a simple pressurized vessel storing flammable gases.

152 Although inherently safer design is a recognized key element of the design process in hazardous industrial
153 processes, it is conspicuous in its absence in fire safety design. In the absence of inherently safer design as
154 a key driver of the design process, the inherent performance of a building (i.e. without safety measures
155 beyond the bare-bones design) has significant potential to be unacceptable. Understanding fire safety
156 performance as a function of the consequences can therefore help to identify features of a building which
157 can lead to consequences in the event of a fire that are clearly unacceptable and require treatment. Scenarios
158 can be identified and the potential consequences determined, enabling an estimation of what the Maximum
159 Damage Potential for the building is. This Maximum Damage Potential can then be reduced through design
160 decisions until an acceptable threshold is reached.

161 The output of implementing the inherently safer approach to FSE can give confidence that objectives such
162 as life safety can be achieved. An approach based on frequency estimates might be use to argue
163 compliance, nevertheless, will not necessarily achieve the objective. An inherently safer approach leads to
164 understanding both the initial and residual damage potentials of the system, and then to introduce necessary
165 design features or safety measures that enable an adequate performance. The need for such an approach is
166 not unique to FSE, as Kirchsteiger [12] has presented, deterministic analyses can be used to complement
167 PRA results in nuclear power plants, where *negligible likelihood does not offer adequate compensation for*
168 *potentially catastrophic consequences*.

169 **3 Probabilistic analyses**

170 Producing trustworthy risk assessment results is typically represented by uncertainty measures or
171 judgments. In engineering disciplines with a mature use of PRAs this is a challenge partly due to the
172 complexity in characterizing random variables used as inputs, which relies on robust statistical data or the
173 need for demanding sensitivity analysis, e.g. testing different probability distribution shapes and
174 parameters. In FSE this challenge is very significant because of the complex nature of the fire phenomena
175 and the impact of the many possible intervention strategies. The impact of all assumptions embedded in the
176 available fire models and the limited statistical data represent a key challenge that will be discussed first in
177 this section.

178 For a moment, assume that uncertainty margins can be appropriately established and communicated to key
179 stakeholders. At that stage, the risk assessment is finished and its outputs can inform the selection of
180 physical or administrative measures to prevent, control and mitigate fire risk. FSE has a long tradition of
181 developing and improving physical measures that control and mitigate fires. This is self-evident from the
182 contents and structure of building codes around the world. Linking the physical measures to the actual fire
183 safety performance of the design is not self-evident. Although additional layers of protection would
184 instinctively represent an added level of safety, this might not be the case if the fire effects, and the failures
185 these can trigger, are not well understood. This is the second challenge that will be discussed.

186 **3.1 Uncertainty**

187 PRA-related literature from fields where it has been extensively used indicates that establishing and
188 communicating the uncertainty involved in the assessment is a major challenge. No evidence exists to
189 indicate this would be different in FSE. In contrast, the lack of predictive capacity [15] and accuracy [16]

190 of PRAs when applied to fire safety problems has been previously recognized. Magnusson [17] first pointed
191 this out in 1997 and called to apply PRAs from first principles, as data availability was a problem without
192 a clear solution in sight. In a similar manner, in the context of hazardous facilities like nuclear power plants,
193 warnings about poorly characterized uncertainty, the excessive complexity of acceptance criteria and the
194 need to improve transparency in the PRA process have been noted decades ago [18].

195 The available statistical data for the reliability of fire safety measures like doors [19], smoke detectors [20]
196 and sprinklers [21, 22] for the built environment is highly dependent on both the reporting quality and the
197 conditions under which the data is captured; both of these factors are largely uncontrolled except by the
198 assumption of compliance with the applicable construction code. Sprinkler reliability is extremely high as
199 most frequently assumed in fire safety engineering practice, if the data is presented with sufficient detail
200 represent real life performance. A sprinkler can fail to provide its intended function if: 1) it activates and
201 fails to suppress the fire, 2) it activates but fails to control the fire, or 3) it does not activate. Most often than
202 not sprinklers fail to activate as a result of human error, not because of failure of the equipment itself [23,
203 24]. This type of failures are then representative as they can impair the sprinkler system and render it
204 absolutely ineffective. Ignoring any of the failure modes would result in a rate that will not reflect the reality
205 of humans interacting with the system (occupants, property managers, contractors, etc.) Taking a failure
206 rate based only on the first rate, as often publicized, would require introducing a significant assumption into
207 an assessment like a PRA, i.e. a >99% probability when the chances of a successful activation can be 7 out
208 of 10. An important reflection is that data recording has not significantly improved since the late 1990s,
209 back when Magnusson [17] carried out initial PRAs in FSE, making his conclusion still current and valid:
210 Data availability and data quality is a huge problem that may obscure the trust on the outputs of a PRA.

211 **Quality and granularity of fire reliability data**

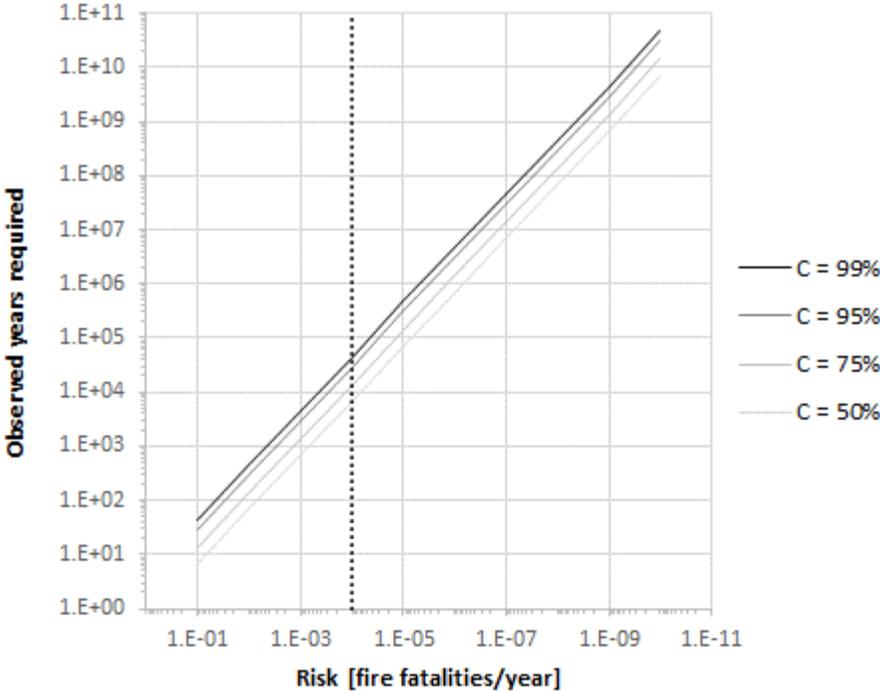
212 Smith [25] describes a best practice to recording failures, which goes beyond failures on demand (as in the
213 case of a sprinkler not working when a fire occurs) and require a detailed accounting of time between
214 failures, associated causes, cost, repair length (if applicable). For safety reliability data used in chemical
215 process, Smith [26] identifies different issues to be considered with existing reliability databases. Despite
216 these data bases having been constructed over decades, they still deliver results that establish failure rates
217 with an uncertainty range of two to three orders of magnitude. Existing fire datasets do not even follow this
218 best practice [27]. Furthermore, fire data does not capture all failure data, but only that associated to a
219 recorded fire further increasing the uncertainty range. It is therefore expected that these data sets will suffer
220 from many of the issues identified by Smith.

221 **Completeness of fire reliability data**

222 Often, guidance documents for fire risk assessments mention the issues of lack of data [28] but seldom
223 discuss the quality of data in existing databases or their sample size. In contrast, in other disciplines the
224 relationship between quality of data and sample size has been discussed extensively, as exemplified in the
225 reliability analysis of autonomous vehicles [29]. Such considerations have not been introduced to judge the
226 appropriateness of data associated to fire safety. In principle, suppliers of safety measures could provide
227 probabilities of failure of sufficient quality to enable their integration into a PRA, however, this is currently
228 not the case. The approach by Klara [29] might give some insight into how to obtain the necessary
229 observation.

230 Assume that an individual risk value of 1 fatality per 10 thousand years (1×10^{-4} fatalities/year) is taken to
231 define adequate performance. A confidence level (ranging from 50% to 99%) is defined and an assumption
232 made that a building based on this design will not experience a fire while observed. Then, the number of
233 years required for observation of a single building can be estimated based on the binomial distribution and
234 yield the results of Figure 1. For a confidence level of 95%, a single building would need to be observed
235 for 30 thousand years, which makes no sense. An alternative would be observing a thousand buildings
236 based on the same design for 30 years, which although feasible, raises the question of finding a thousand
237 identical buildings. Because buildings have different locations, occupation, regulations, etc and all these

238 variables affect fire safety, finding one thousand building with the same expected fire safety performance
 239 is not possible. This simple calculation is meant to show the real challenges of using probabilistic risk
 240 criteria in FSE without adequate data supporting it. The reality is that data to support a positivist perspective
 241 simply does not and cannot exist.



242
 243 *Figure 1. Number of years required for observation for different risk levels*

244 **3.2 Safety measures**

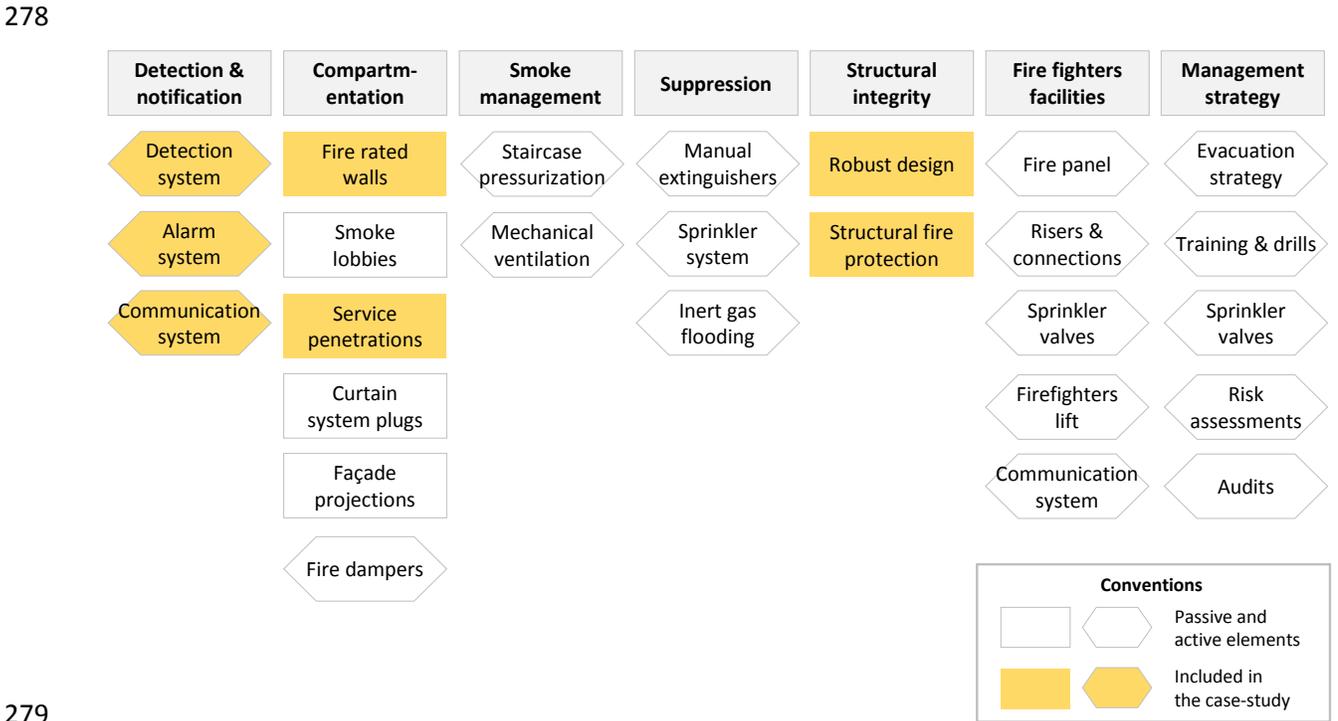
245 Most FSE guidelines address fire as a low probability event, nevertheless, when referring to this low
 246 probability event, they are already referring to an event of significance. A non-significant fire is a high
 247 probability event that will occur somewhere within a building during its usable lifetime, and it is the fire
 248 safety design which prevents these from turning into significant fires. Therefore, within the design process
 249 of a building it must be assumed that a fire will occur and thus its probability is unity.

250 That assumption is the fundamental reason behind the fact that all buildings include some level of fire
 251 protection measures; and is consistent with prescriptive design. In prescriptive design, safety measures are
 252 introduced into a building to prevent a fire from becoming significant or to limit the potential for intolerable
 253 consequences of a fire to occur. The extent of these safety measures required is a function of the foreseeable
 254 size of the fire and/or the consequences should the fire safety strategy fail. They are never prescribed in
 255 response to the perceived frequency of a fire. PRAs are significantly driven by likelihood estimates and so
 256 are the safety measures selected to manage the risk measure they produce. This begs the question of how
 257 well these estimates convey the information linking failure modes and the consequences they can lead to;
 258 if this is poorly conveyed, selecting safety measures becomes a merely utilitarian exercise.

259 An example of a direct link between failure and consequence is concrete cover as a protection feature.
 260 Within a certain range of fire growth rates the concrete cover will remain in place and the probability of
 261 failure will be negligible, functioning as intended and yielding acceptable consequences. If the growth rate
 262 increases beyond a certain threshold, spalling may be expected and the concrete cover will no longer exist,
 263 resulting in the exposure of reinforcements. In this scenario, a different level of damage will be expected.
 264 A probability of unity can be assigned to spalling beyond that certain fire growth rate threshold. Using a
 265 detailed probability function is not granted given the complex nature of spalling and therefore a

266 conservative step function can be used. The resulting consequences will have to be approximated because
 267 of modelling limitations; thus full exposure can be assumed once the growth rate threshold is reached. This
 268 and other approximations would have to be done in a rational and deterministic manner and most likely be
 269 very conservative.

270 In contrast, other elements of the fire safety strategy (see Figure 2), while having a specific function aimed
 271 at either preventing, controlling or mitigating the effects of a fire, are coupled to other safety features and
 272 can create multiple paths of consequence. When looking at each specific component it is important to
 273 understand the different manners in which it can affect the damage caused by fires. For example, detection
 274 will primarily address the effects on people by establishing the onset of the evacuation process while
 275 fireproofing of the structure limits the effect of heat on structural performance. Nevertheless, detection
 276 might be called to influence structural behaviour by enabling fire suppression, while fireproofing might
 277 support egress by providing a protected means of egress.



279
 280 *Figure 2. Typical safety features of a fire safety strategy. Highlighted elements correspond specifically to the risk*
 281 *assessment of the case study presented in section 4.*

282 Reliability changes most significantly as a function of the manner in which the fire safety element reacts to
 283 the fire. Elements requiring a trigger to work are deemed *active*, while those that work without any
 284 triggering action are deemed *passive*. Reliability and availability of active safety elements cannot be
 285 ensured and there is evidence for their failure [30], which creates a very real ‘potential for surprise’ if they
 286 fail to provide the required function when needed. In contrast, passive elements have a much higher level
 287 of reliability but the effect of their failure on the consequences of a fire can be more significant. The collapse
 288 of WTC1 & 2 [31, 32] is an example where dislodged fire proofing was an event of negligible likelihood
 289 and which had an extreme effect on the consequences. This event was caused by a preceding event (aircraft
 290 impact) that was considered in the structural design of the building but the scenario of the impact effects
 291 was not accounted for in the design of the fire safety strategy. Reliability is therefore also a time dependant
 292 function that requires frequent reassessment to account for deterioration and new failure modes.

293 It could be argued that high consequence fires have low occurrence rates, therefore the focus should be on
 294 the reliability of safety measures. This seems to resonate with failures in the aviation industry. Downer [33]

295 discusses the strict and independent failure rate required by authorities on components and the responsibility
296 of manufacturers to demonstrate their products meet it, usually through redundant safety measures. Downer
297 [34] draws attention to the use of redundancy as a way to demonstrate acceptance of technological risks
298 and the problems it does not solve. The complexity of problems such as jet aircraft engine failure is such
299 that testing of the engine cannot provide accurate reliability measures thus scenarios that could potentially
300 alter the performance of the engine are also included in the reliability assessment. This is the case of the
301 assessment of bird impact on the performance of an engine by means of an artificial chicken shot onto
302 operating engines; defining the chicken and its impact parameters reflects the same issues mentioned earlier
303 about scenario identification and the impossibility to exhaust them. Downer [34] indicates that acceptance
304 has to address complexity, independence, unforeseen failure modes (as in the case of the Boeing 737 MAX
305 [35]) and human factors. Redundancy can be seen as the only way engineering can guarantee a particular
306 result despite the possibility of it failing through unforeseen causes; this poses an important challenge that
307 can be addressed through diversity of design [34]. Such an approach aims at designing redundancies in a
308 way that they are not susceptible to common failure points by using creativity and innovative redundancies,
309 in preference to simpler approaches such as doubling up a particular safety measure.

310 In FSE, justifying a building design based on the performance of a particular safety measure requires this
311 system being available and reliable when needed, otherwise being backed up by an independent and diverse
312 redundancy. With statistics not guaranteeing reliability and stakeholders pushing for cost reduction,
313 diversity in design is rather an uncommon practice in FSE. Instead, it is not uncommon that performance is
314 dependent on a single safety measure which despite reportedly high reliability is nevertheless subject to
315 failure at a rate that cannot satisfy the required level of safety in a building. This is the case of sprinklers,
316 which are commonly deemed as highly reliable and effective. As shown by Long et al. [36], data on
317 sprinklers shows that in fires large enough to activate them, 1 out of 10 sprinkler systems fail to be effective.
318 Those are significantly concerning odds if the whole adequacy of fire safety performance relies on this
319 single safety measure. One of the key causes for sprinkler ineffectiveness reported by Long et al. [36] is
320 improper maintenance; this is important, as poor maintenance for sprinklers might reflect poor maintenance
321 overall and therefore reduce the odds of a successful redundancy or back up being in place.

322 **4 Maximum Allowable Damage (MAD)**

323 Apostolakis' [37] review of major PRA developments and criticism in the areas of nuclear power and space
324 missions, concurs with many of the pitfalls described in section **Error! Reference source not found.**
325 Apostolakis also shows how a gradual implementation and evolution of PRAs provide a pathway to manage
326 these pitfalls and turn them into useful outcomes. A robust risk management framework needs to underpin
327 this evolutionary process, conceiving the risk assessment as a process to inform, rather than a mechanism
328 to verify safety. FSE has a long way until scepticism is overcome on the use of PRA (Apostolakis refers to
329 this as Phase 1) and it will not be overcome if the limitations and its potential benefits are not fully
330 understood. This includes acknowledging that no risk assessment exercise compensates for a lack of a clear
331 design philosophy, as well as recognizing that without a good hazard identification the remaining steps of
332 the risk assessment become a futile exercise in number crushing.

333 The central premise of the methodology proposed here is that a building design has an associated maximum
334 damage potential if a fire takes place. If this potential is characterized it can then be compared against the
335 maximum damage that the stakeholders are prepared to accept, i.e. the maximum allowable damage or
336 MAD. In order to characterize the maximum damage potential, it is reasonable to do it when the design is
337 at early stages and includes few safety measures; in this manner the effect of added-on safety measures can
338 be explicitly quantified. This is akin to the inherently safer design philosophy proposed decades ago by
339 Kletz for the chemical process industries [38]. As in any risk assessment, the scenarios included in the
340 analysis depend on the hazard identification techniques used such as logic (fault/event) trees. An important
341 difference is that MAD acknowledges that fire scenarios are an output rather than an input, as some initial
342 assumptions will evolve in the course of the assessment as partial results are obtained.

343 Since all engineering models (including risk assessments) are susceptible to unsupported or inadequate
344 assumptions, MAD incorporates a simple feature to keep track of these. Assumptions can be embedded in
345 inputs (e.g. assuming a determined notification time) or as modelling decisions (e.g. the smoke layer will
346 behave as a uniform hot layer). By tracking each input and assumption and judging the evidence supporting
347 them as well as their potential to change the results, an important layer of information is provided to the
348 analysts, the peer reviewers and to the stakeholders. Such layer of information is typically missing even
349 from the most sophisticated risk assessments, despite being typically hoped for in different guidelines [39].

350 The first outcome of MAD is a quantification of risk, measured as the gap between the maximum damage
351 potential and the maximum allowed. This quantification is complemented by the second outcome, a layer
352 of information regarding assumptions and their potential effect on the results. Effectively this drives the
353 analysts conducting the assessment to continuously identify, judge and challenge their assumptions.
354 Although this process does not guarantee all assumptions are captured or effectively managed, it does
355 provide an explicit approach to judge the quality of a risk assessment. MAD's outcomes are meant to
356 inform stakeholders on whether the damage potential could surpass the maximum acceptable damage, while
357 explicitly accounting for the quality of the assumptions underpinning the assessment, i.e. the
358 trustworthiness of the assessment.

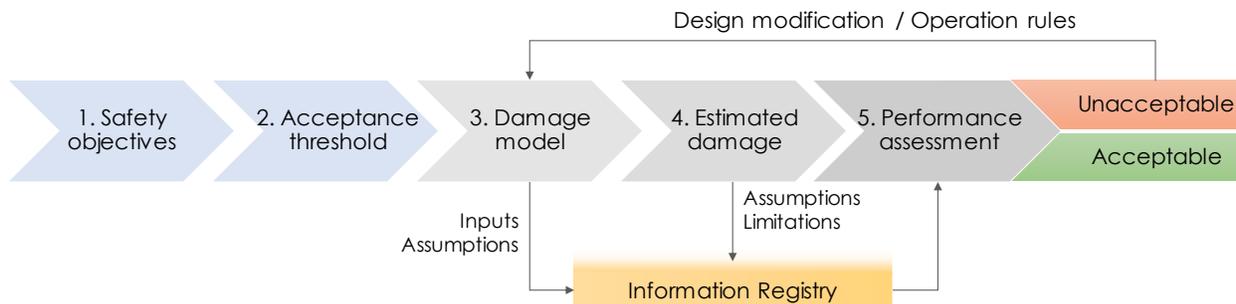
359 An early version of MAD was previously introduced [40] in which the fire performance of a multi-
360 occupancy office building is assessed. There, fire performance is described as a function of tenability for a
361 given fire conditions and the outputs allow identifying safe operation ranges of spaces where fuel loads are
362 variable and can lead to unacceptable performance (e.g. carpark). Such approach is consistent with Bjelland
363 [7] and delivers both a performance assessment as well as an explicit reporting of the associated
364 assumptions and limitations. The latter provides the basis to judge how reliable the consequence-based
365 performance estimate is to support the decision-making process, i.e. assessment trustworthiness. This idea
366 is aligned with the need for buildings to use the safety case scheme proposed by Hackitt [5], originally used
367 in the chemical process safety field for major hazardous facilities who have to demonstrate that
368 consequences of worst case scenarios are acceptable, whether using an absolute criteria or analysing the
369 damage footprint. Such idea might be interpreted as an exaggerated conservative approach, but actual PRA
370 guidance also include such considerations by setting cut-off thresholds for consequences [39, 41].

371 To discuss risk acceptance within MAD it is useful to discuss the generalized frequency-consequence
372 diagram proposed by Coile et al. [42], where as a straight vertical line towards the upper end of the
373 consequence axis is of notice. Such limit is found explicitly in some societal risk curves such as Hong
374 Kong's [43] but it is not typically based on an explicit criteria for unacceptable consequences. The vertical
375 limit indicates that tolerability of high consequence events is related to the magnitude of the consequences
376 as opposed to the frequency of occurrence. In such instances, there is no benefit to considering the frequency
377 and thus the only means to demonstrate tolerability is through mitigation of the consequences. This vertical
378 limit in the F-N curve (where consequences are unacceptable regardless of likelihood) is where MAD is
379 meant to be applied, as this boundary should be clearly defined and used as the ultimate acceptability
380 criterion for evaluating fire risk and therefore the proposed design. Understanding whether the design can
381 cross his threshold or not is the driver to bound the inherent risk of the design, and therefore should be done
382 at very early design stages. Once a design is assessed and assuming its performance is acceptable, i.e. the
383 maximum damage potential is below the maximum allowable damage, the remaining areas in an F-N curve
384 can make use of typical QRA approaches to optimize the design as a function of both likelihood and
385 consequences.

386 **4.1 MAD process**

387 The implementation of MAD consists of five steps (see Figure 3) with the main output being a performance
388 assessment stating whether the system's performance is acceptable or not. The first step defines the safety
389 objectives that typically include: 1) ensuring life safety of occupants, 2) reducing direct and indirect losses
390 and 3) providing firefighters with a building that –when burning- will facilitate their operations, as this is
391 their workplace. The Building Construction and Safety Code (NFPA 5000) [44] proposes having goals

392 (“nonspecific overall outcome to be achieved” of qualitative nature) and objectives (a “requirement that
 393 needs to be met to achieve a goal”). In MAD, objectives reflect the desired outcome while also enable
 394 defining an acceptance threshold as a function of fire damage, e.g. no exposure of occupants to toxic
 395 concentrations.



396
 397

Figure 3. MAD methodology process

398 The second step is defining the *acceptance threshold*, which is closely related to the maximum consequence
 399 that the stakeholders are prepared to accept as described in the discussion of **Error! Reference source not
 400 found.** Most PRA guidance assume that loss will result from the fire occurring, while in MAD the system
 401 performance is assessed to understand if the maximum damage potential is acceptable. An unacceptable
 402 result would call for design modifications or the reliance on additional safety measures, with the
 403 understanding that these can fail on demand and therefore requiring defining the responsibilities for their
 404 availability and reliability.

405 The third step requires constructing a model that reflects the available knowledge of how fire leads to
 406 damage in the system. Numerous existing tools can be employed for this purpose including causal diagrams,
 407 failure and event trees, failure mandalas [45] and systems thinking as suggested by Bjelland [7].
 408 Deterministic methods can be regarded as simplistic, but they are only so if the abstract representation
 409 supporting them is simplistic as well. The damage model effectively reflects the relationships and
 410 phenomena taking place during a fire that the assessment will take into account, i.e. provides an initial
 411 bound to the scenarios and to the damage potential of a fire. Park et al. [46] exemplifies such complex
 412 relations between building and occupants characteristic and although all damage models are inherently
 413 imperfect, these are key to successfully achieving the objectives of a performance-based design [47]. In
 414 order to provide an adequate bounding to scenarios, the damage model construction must be led by a
 415 competent fire safety professional.

416 The fourth step uses engineering tools to quantify the damage model. In FSE there is a large range of tools
 417 to choose from, ranging from empirical correlations or simple tools as the compartment fire framework, all
 418 the way to computer fluid dynamics (CFD) and finite-element analysis (FEA) models. Each tool has
 419 underlying assumptions and parameters, which should also be incorporated in the information registry for
 420 trustworthiness considerations. Using the selected tools and inputs a set of scenarios or system conditions
 421 are selected and the damage is quantified.

422 The fifth and last step evaluates the maximum damage potential against the defined acceptance criteria. If
 423 the performance assessment is acceptable, the information registry provides insight on the actions required
 424 for the assumptions to remain valid during the lifecycle of the system. In the opposite case, trustworthiness
 425 enables identifying and prioritizing the aspects causing and thus understand how to modify the system to
 426 obtain a better performance. This approach is consistent with the *design for change* approach proposed by
 427 Bjelland [7] and with the holistic approach to fire safety advocated for by Hackitt [5].

428 MAD could be labelled ‘too’ conservative if understood as a typical deterministic assessment where inputs
 429 are as onerous as possible. This is not the case, as MAD provides a framework to understand the worst
 430 possible performance of the system as the first necessary basis for decision-making in Fire Safety

431 Engineering. Explicitly registering the quantities (and values), models and associated assumptions into the
432 information registry constitutes an explicit log that allows iterating the damage model and improve the
433 trustworthiness of the performance assessment. The registry enables practitioners to reflect upon the limits
434 of their knowledge and the necessary degree of conservatism. As a result, MAD does not just provide a
435 quantification, but a comprehensive insight on fire safety performance and the responsibilities associated
436 to maintaining the conditions necessary for it to remain adequate.

437 **4.2 Safety measures in MAD**

438 The authors acknowledge the role of safety measures in assessing the performance of a building (see section
439 1). However, fire behaviour is a function of the active or failed safety measures. Assuming a safety measure
440 will be in place and will be effective prescribes the conditions and departs from the intent of performance-
441 based design and from the intended scenario discovery in PRAs.

442 To understand the performance of the building it is necessary to consider the effect of the active safety
443 measures not being available (e.g. detection, notification, suppression, mechanical extraction). Assessing
444 the building under this conditions allow identifying which of these systems are essential for an acceptable
445 performance. In the case study it is clear that not having a detection system in place would yield an
446 unacceptable performance regardless of the behaviour of any other variables, and therefore it must be
447 ensured to work throughout the life-cycle of the building.

448 Other safety measures are assumed to fail ($p_{\text{failure}} = 1$) and are excluded from the damage model based on
449 professional judgment and existing evidence, e.g. exclusion of suppression systems due to lack of applicable
450 reliability data. Hence, the role of probabilities in MAD is to identify the assumptions required for an
451 acceptable performance and the resulting responsibilities for these to remain valid. This avoids the objective
452 –and temptation– of demonstrating negligible likelihoods. As discussed by Apostolakis [37], the purpose of
453 a PRA is not finding the ‘true’ value of a risk index, but to reflect uncertainties and prioritize failure modes
454 and scenarios that can inform resource allocation (including further research needs). This point is discussed
455 by Aven [30] in a more pragmatic manner, claiming that PRAs should be restricted to understand the effect
456 of variability in systems under available knowledge.

457 **5 Context to the case study**

458 A high-rise residential building with a layout and façade similar to the Grenfell tower has been selected for
459 this case study. In the case study, the façade of the building was found to be non-compliant due to the
460 flammable hazard it introduces. The aim of implementing MAD to this case study is to understand the
461 damage potential of a fire and propose a remediation strategy for this non-compliant facade. Before
462 introducing the case study itself, it seems necessary to provide context on the topic of façade fires and the
463 large problem they represent across many jurisdictions around the globe.

464 Largely, the fire concerns associated with façade stems from their dramatic success in increasing building
465 energy efficiency. Such effects is exemplified by the retrofitting of 44 existing buildings in Copenhagen
466 [48] that led to a reduction of the buildings annual energy consumption of between 31% to 67%. Facade
467 systems are significant and relevant solutions as 36% of global energy demand is associated to building
468 construction and use [49].

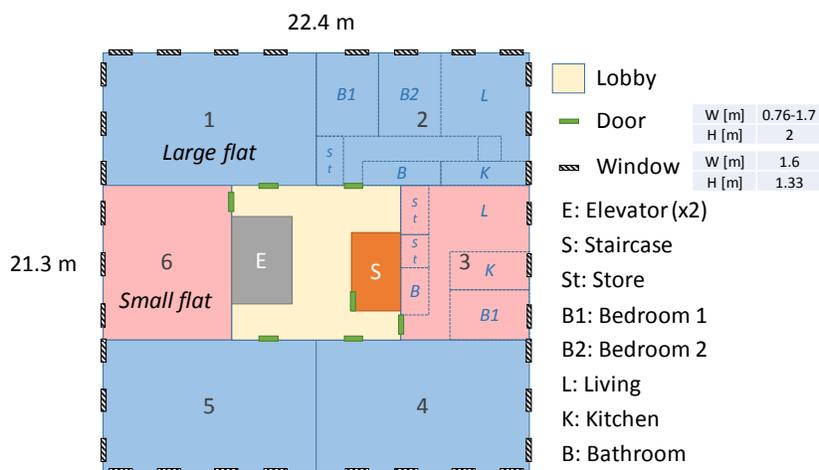
469 However, the implications of using combustible materials in a façade are not addressed extensively in FSE.
470 Existing studies use laboratory-scale flame spread to assess tenability in rooms over the fire of origin [50],
471 while others qualitatively describe the complex behavior of the burning façade noting the effect that
472 elements like sealants and tapes have on the overall behavior [51]. In 1990, Oleszkiewicz [52] described
473 the complexities of evaluating flame spread in façade systems, claiming that a full-scale approach is the
474 most reasonable and that escalation from laboratory-scale is not linear. Current design methods [53] and
475 standardized large-scale testing [54] evaluate façades without taking into account key variables like wind
476 loads, installation defects, complex geometries and other factors directly affecting flame spread. Studies
477 exist on particular façade issues like the effect of the insulation layer thickness and [55] but do not provide

478 an overall understanding or measurement of flammability at large-scale. Bonner and Rein [56] point out
 479 the usefulness of an index that reflects façade materials flammability, while also highlighting that this is
 480 not attainable under current testing protocols.

481 Considering recent fire events in Australia, Qatar, England, Scotland, China and United Arab Emirates [50,
 482 57] that led to significant human, economic and legal consequences, these systems constitute a major
 483 challenge for the built environment, for FSE practitioners and for the FSE discipline itself. Consider
 484 residential buildings where combustible materials have been used in facades at a large scale. In Australia
 485 there are reports of expected 2000 affected buildings in New South Wales, while in Victoria about 800
 486 privately owned (>400 deemed as ‘high risk’ [58]) and 400 government owned buildings have been
 487 identified [59, 60]. In England the situation is similar, where 155 high-rise residential and public buildings
 488 have already been remediated and more than 360 residential buildings remain to be treated (about half of
 489 these belong to the social housing sector) [61]. Noticeably, the Grenfell fire embodied the damage potential
 490 of a fire involving combustible cladding in a building with a single staircase, an intricate smoke extraction
 491 system and a stay-put evacuation strategy. Fu [62] discusses how a compliant building was stuck in time
 492 and was not updated to incorporate safety measures that could have helped providing a better performance
 493 during a fire. However, design decisions such as the staircase number or key components to
 494 compartmentation and redundancies are hard to update and typically will not be justified solely by an
 495 economic assessment.

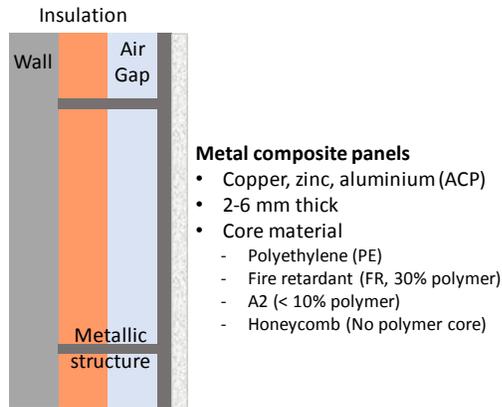
496 6 Case study

497 The case study is set in a 20-storeys residential building comprised of a concrete frame and a single core
 498 containing the only staircase. Each residential level (levels 1 to 20) has four large and two small flats and a
 499 connection to the lift lobby area as described in Figure 4. In the lobby area of each level there is access to
 500 the elevators (not suitable for evacuation purposes) and to the emergency staircase, which is the sole
 501 evacuation path of the building. The building has an occupancy that can range between 494 people (normal
 502 occupancy) and 950 (maximum expected occupancy).



503
 504 *Figure 4. Floorplan for a typical residential level; numbers correspond to each flat*

505 The existing façade system currently achieves a ten-fold reduction of the U-value of the building and
 506 significantly increases energy efficiency; at the time this was one of the main drivers for the design of the
 507 system. The materials chosen for the façade are Polyisocyanurate (PIR) for thermal insulation (100-160
 508 mm thickness) and a 4 mm thick sandwich panel of aluminum layers with a 3 mm thick polyethylene (PE)
 509 core, as presented in Figure 5.



510

511

Figure 5. Schematic representation of façade system

512 6.1 Safety objective

513 One of the purposes of the building is to provide safe living quarters for the occupants, and installing the
 514 façade system introduces hazards that may jeopardize it. Given the combustible nature of the façade system
 515 materials (e.g. PE), there is a potential for an internal compartment fire spreading to the building's exterior
 516 and affecting the current evacuation plan and overall fire safety strategy. Therefore, the safety objective
 517 selected for the risk assessment is ensuring life safety of the occupants when a fire occurs. Structural
 518 integrity and fire-service intervention considerations are beyond the scope of this assessment.

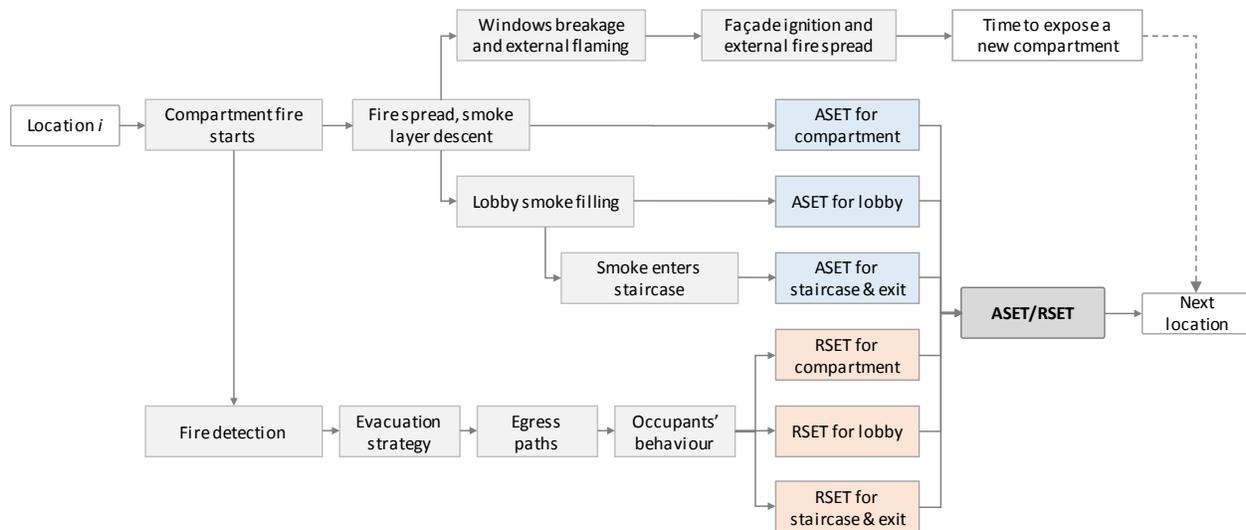
519 6.2 Acceptance criterion

520 The stakeholders' acceptance criterion for life safety has been set in qualitative terms: with the exception
 521 of the flat of origin, the occupants will not be in contact with smoke or fire until evacuation is completed
 522 or the fire is fully extinguished. Other acceptance criteria could be envisioned but this one was chosen for
 523 clarity, simplicity and because it meets the intent of life safety of almost all building codes. This implies
 524 that occupants will have enough time to evacuate before being in contact with smoke or fire. The damage
 525 quantification then calls to estimate the available safe egress time (ASET) and the required safe egress time
 526 (RSET). ASET refers to the time that occupants have before the conditions in the building are untenable,
 527 while RSET refers to the actual time that they need to egress. When the ratio of ASET to RSET is greater
 528 than 1 the performance is unacceptable as occupants will be exposed to untenable conditions.

529 6.3 Damage model

530 ASET/RSET is made of quantities that reflect the damage potential. Defining each quantity is a complex
 531 problem on its own and the approach has recognized limitations [63]. Bjelland [7] discusses the relevance
 532 of this ratio in FSE as well as highlighting that currently there is no standard way of modelling it. Modelling
 533 the damage require proposing a model including the involved phenomena and the associated variables. The
 534 elements of the fire safety strategy considered for this particular case study are those highlighted in Figure
 535 2.

536 The proposed damage model results in the flow diagram presented in Figure 6, which provides an
 537 understanding of how ASET and RSET are estimated for each location within the building. The
 538 assumptions and limitations associated to this damage model are established in the model and are identified
 539 with the reference marker A#, where # refers to the number of assumptions, e.g. A7. These are collated in
 540 Table 7. The impact of these assumptions on the fire safety strategy are discussed in section 6.6.



541
542

Figure 6. Damage model for the case study

543 ASET describes the time to untenable conditions defined by the smoke layer height (2 meters; A0).
544 Tenability is assessed for (i) the compartment where the fire starts (location i), (ii) the contiguous lobby
545 and (iii) staircase. Tenability is a function of several variables, including fire growth, compartmentation
546 and safety barriers. Being consistent with the acceptance threshold (section 6.2), tenability is defined based
547 on the time occupants have before being in contact with the smoke.

548 Given the significant uncertainty associated to defining the fire growth due to fuel load and distribution
549 variability, fire growth is assumed to behave as an alpha t -squared fire (A1). As fuel load is unknown and
550 impossible to fully control during the building operation, an onerous condition is selected. First, the fuel
551 selected is polyurethane foam, typical of residential upholstery. Second, the area covered by the fuel is the
552 total area of the compartment selected for the fire to start. Third, the fuel density is fixed at 26 kg/m^2 , which
553 is typical for a residential setting [57].

554 Compartmentation is the physical ability to stop smoke and fire spread, which can be broken due to lack of
555 physical barriers or their failure due to occupants' behavior or material properties. Based on the previous
556 and following the MAD rationale, compartment doors are assumed open, as well as fire safety doors leading
557 to the emergency staircases (A2). Compartmentation is also relevant for the involvement of the façade.
558 Window breakage is defined by the difference between the temperature of the smoke layer and that of the
559 window in the unexposed side. Keski-Rahkonen [64] suggests that breakage is possible with differences
560 larger than 100 K . A conservative breakage criterion of 80°C on the exposed side is selected, given that the
561 smoke layer covers the windows fully (A3).

562 Broken windows enable external flaming, as the compartment is ventilation controlled (opening factors for
563 the living room, bedrooms and kitchen range between $19.5 \text{ m}^{-1/2}$ and $23.8 \text{ m}^{-1/2}$). External flaming is assumed
564 to begin immediately after window breakage (A4), given that the criteria for flashover is achieved (heat
565 flux of 20 kW/m^2 on the floor of the compartment).

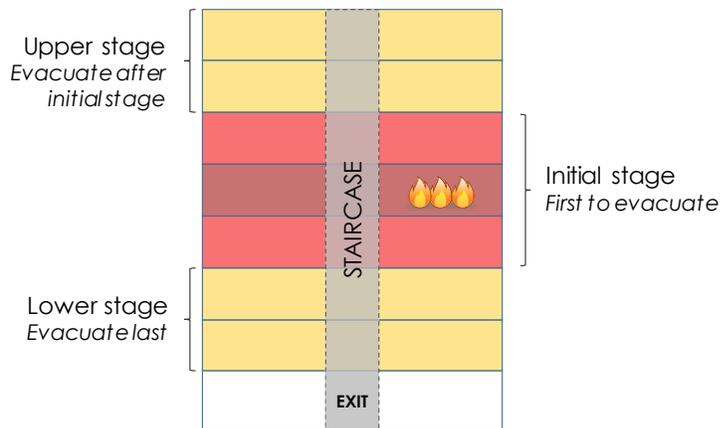
566 External flaming will lead to an impinging heat flux on the façade, which if above a critical heat flux will
567 cause the ignition of the combustible materials present in the facade. This critical heat flux is set at 18
568 kW/m^2 , taking into account the particular materials of the proposed façade [57]. The delay between flame
569 impingement and ignition given a heat flux higher than the critical one is assumed to be of zero seconds
570 (A5).

571 Given that the façade has ignited, the damage model assumes that only upwards propagation will occur and
572 that the flame spread rate will be similar to those recorded in real events (A6), e.g. 4 m/min [57].

573 No wind effect is considered (A7), besides the consideration of using real fire spread rates (A6). Although
574 wind can significantly increase damage by helping flame spread horizontally, current knowledge limits the
575 possibility of modelling its potential contribution to vertical and horizontal flame spread.

576 As flame spreads up the façade, re-entry is expected to occur once the spread reaches the next set of
577 windows and cause their failure. Experimental setups of ACM cladding [65] resulting in a temperature
578 range of 296-915°C above the window sill (2.5 meters) and a temperature of 526°C without flame spread
579 barriers (most similar to this case study). Based on A3 and the previous experimental results, it is assumed
580 that the time delay between the flames reaching the windows and the fire re-entry is zero seconds (A8).

581 RSET is a function of the detection time, notification time, pre-movement time, the time required by the
582 occupants to reach a safe place and the evacuation strategy, i.e. evacuation order. Detection is modelled
583 based on smoke obscuration, with a criterion of 24 %/m (A9). Notification is assumed to occur in 30 seconds
584 after detection (A10), while pre-movement time can vary largely (A10). Modelling occupants' behavior is
585 done assuming no erratic/panic behavior and a homogenous demography for the occupants (A11). The
586 evacuation strategy is staged (A12), with the initial stage (level where fire originates and levels above and
587 below) evacuating first, followed by the upper and lower stages (see Figure 7).



588
589

Figure 7. Staged evacuation scheme

590 The above allows estimating ASET and RSET for location i , as well as for contiguous lobbies and staircase
591 sections. If the initial compartment fire triggers external flame spread, the model restarts at locations $i + 1$.
592 This enables estimating ASET/RSET for the whole building and assess its overall performance. The
593 quantification of this model requires inputs and engineering tools that are described in detail in the next
594 section.

595 6.4 Damage estimation

596 Some quantities that directly feed the damage model have been already defined, for example, the use of
597 critical heat fluxes for façade ignition or its vertical flame spread rate. To quantify the whole model, the
598 following set of tools are selected:

- 599 a. CFAST v7 [66] to model the compartment fire and model tenability
- 600 b. Abecassis-Empis [67] model to estimate heat flux from the fire to the façade
- 601 c. Smoke detector model embedded in CFAST v7 [66]
- 602 d. Hydraulic model for modelling the occupants evacuation [68, 69]

603 From the selected tools, a and b allow estimating the fire dynamics while c and d address the detection and
604 evacuation. Assuming the detection will behave exactly as in CFAST is not realistic, as some very fast fire
605 could yield detection times of 0 seconds. Given uncertainties associated to the detection model implemented
606 in CFAST, a minimum detection time of 50 seconds has been established (A9). This value of 50 seconds
607 corresponds to the maximum detection delay presented in the validation data for the detection model

608 implemented in CFAST [57]. The façade ignition is modelled using the critical heat flux for the façade
 609 materials and comparing them with the heat flux generated from the fully developed fire using the
 610 Abecassis-Empis correlations. The latter yields an estimated heat flux of 66 kW/m² impinging on the
 611 bottom of the façade (closest distance to the window opening), which based on known critical heat flux
 612 [57] ensures ignition. The criteria used for ASET calculation, including smoke layer height, toxic species
 613 concentration, critical heat flux for the façade ignition and window breakage are presented in Table 2.

614 Table 1. Representative quantities associated to the ASET calculation

Quantity	Value / Range	Units	Justification
Heat release rate per unit area (HRRPUA)	400	kW/m ²	The reported value for PU foam tests [70] is within this range, associated to residential values [71]
Fuel load for all flats	650	MJ/m ²	Value associated to an expected fire load of 26 kg/m ² and the ideal heat of combustion of PU foam of 25 MJ/kg, within the bounds presented by [71]
Fire growth rate	[0.0029, 0.1876]	kW/s ²	Bounding limits on t-squared fire growth
Peak heat release rate	Variable	MW	This value is computed as the product of the HRRPUA and the total area of the compartment
Location of initial fire	Kitchen, Living room, Bedroom	-	These locations have direct contact with windows, yielding the shortest times for the external fire spread to begin
Door status	[Open, Closed]	-	Bounding limits on ventilation
Upwards fire spread rate	4	m/min	This value corresponds to the rate registered in the Grenfell tower fire [57]

615 Table 2. Tenability criteria for ASET calculation

Quantity	Value / Range	Units	Justification
Compartment and lobby tenability: Smoke layer height	2	m	At this height occupants can start inhaling the toxic gases of the hot gas layer [72]
Staircase tenability: HCN and CO concentration	7000, 150	ppm	Criteria based on Purser [72, 73]
Critical heat flux for façade ignition	18	kW/m ²	Criterion based on Torero [57]
Window breakage criteria: upper layer/external flames	80	°C	Typical commercial glass fails at around this temperature; furthermore uPVC (used in the window frame) loses 80% of its stiffness by this temperature value [57, 74]

616 RSET was calculated using the quantities for detection, notification, and displacement and queuing within
 617 the level. The time for displacement in the staircase and until the exit is estimated for each level. The
 618 associated values and ranges for the application of the hydraulic model are presented in Table 3, with the
 619 rest of the parameters of the queuing model taking values as reported in [68].

620 Table 3. Representative quantities associated to the RSET calculation

Representative quantity	Value / Range	Units	Justification
Occupants	26	People/level	This value represents the upper limit of occupation, equivalent to three occupants in each small flat and 5 occupants in the large ones
Detection criterion	24	%/m	NIST CFAST Technical guide [75]
Notification time	[30, 600]	s	This value is unknown and could be expected to be at least 30 seconds [68].
Pre-movement time	[30, 60]	s	Expected to be at least 30 seconds for the room of fire origin and 60 seconds for other rooms [68]
Horizontal distance	20.2	m	Maximum distance from a flat door to the staircase door
Vertical distance	3.61	m	Stairs path from floor to floor taking into account the steps; distance between floor is 3 m

Representative quantity	Value / Range	Units	Justification
Walking speed (horizontal, vertical)	1.4	m/s	This velocity is used as the basis of the estimation of the occupants speed within the hydraulic model [68] and is based on statistical information of occupants egress speed [69]
Occupants density in staircase	[1, 2]	People/m ²	Purser [76] reports that a density of 2.1 people/m ² yields no movement in stairs

621 In total, 66 representative quantities were used as part of the damage estimation. In the context of a
622 traditional quantitative or probabilistic risk assessment, these variables define a range of possible
623 ‘scenarios’ which could yield different performances (see quantities in Table 1 and Table 3). In this
624 particular application, these quantities are a direct result of the damage model proposed in section 6.3, and
625 could have been different if it was constructed using an event tree analysis or other appropriate tool.

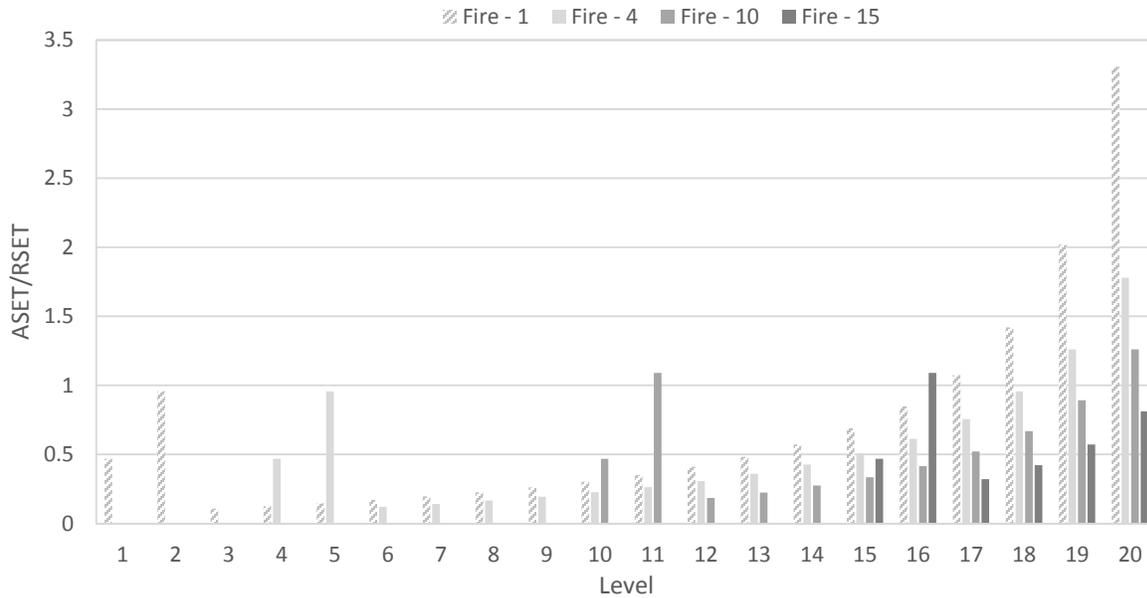
626 **6.5 Performance assessment**

627 Using the values presented in Table 1 and Table 3, a wide range of conditions or ‘scenarios’ are possible
628 for which the performance is assessed. Some of the inputs to the damage estimation may paint an extremely
629 conservative approach. However, major events experience demonstrate that all these ‘conservative’
630 conditions are feasible and unfortunately, recurrent. The performance assessment presented in this section
631 focus on discrete scenarios aimed at identifying the upper limit of the damage potential, i.e. the maximum
632 damage potential (MDP). Exploring alternative scenarios, e.g. effective fire doors, yields a more complete
633 picture of the damage potential as exemplified by Cadena [40].

634 **Maximum Damage Potential**

635 In this case study the focus is first put on identifying the MDP and then exploring the damage potential
636 through additional (presumably less conservative) scenarios. To identify the MDP the bold quantities
637 highlighted in Table 1 and Table 3 are used to quantify the damage model presented in section 6.3,
638 corresponding to an ultra-fast fire and a vertical flame spread rate of 4 m/min. The results for the flat of
639 fire origin result in an ASET/RSET ratio of zero for a fire starting in the kitchen (ASET = 0 s, RSET = 80
640 s) and of 0.12 starting at the living room or at the bedroom (ASET = 10 s, RSET = 80 s). These results are
641 independent of the level at which the fire starts. The overall performance of the building depends on the
642 level on which the fire originates.

643 The results for the lobby and the staircase consider fire origin at level 1, 4, 10 and 15 and a fire starting at
644 the kitchen (lowest ASET with 90 s) are presented in Figure 8. For fires starting at these levels the
645 resulting evacuation time using the staged evacuation ranges between 64 and 67 minutes (~1 hour), with
646 the longest times for fires closer to the top of the building. Although the variation is not large in the
647 evacuation time, Figure 8 shows the significant impact on the ASET/RSET due to the involvement of the
648 façade and the resulting fire reentry.

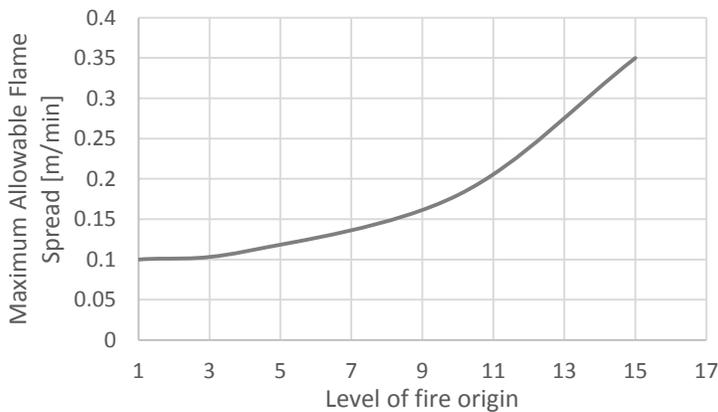


649
 650 *Figure 8. Maximum Damage Potential as a function of ASET/RSET for the lobby at each level – fire starting at 4th,*
 651 *10th and 15th level*

652 **Damage potential – base scenario**

653 The results of the previous section are based on the mean vertical flame spread registered in the Grenfell
 654 tower fire (4 m/min). Although variations were registered of up to 6 m/min, this rate is taken to represent
 655 the worst condition. An inherently safe approach for the remediation of the building is to ensure a maximum
 656 allowable flame spread as a result of the involvement of the façade, assuming no other variable can be
 657 modified.

658 The maximum allowable flame spread was obtained by iteration, modifying the results presented in Figure
 659 8 until only the level of origin has an ASET/RSET<1. The results are presented in Figure 9 and indicate
 660 that a rate of 0.1 m/min should be ensured if the façade is involved in the fire in order to yield an acceptable
 661 result. Such a result can be ensured by using a non-combustible façade, as ensuring such a low rate would
 662 imply experimental and analysis uncertainties that cannot be managed [52].



663
 664 *Figure 9. Maximum allowable upward flame spread*

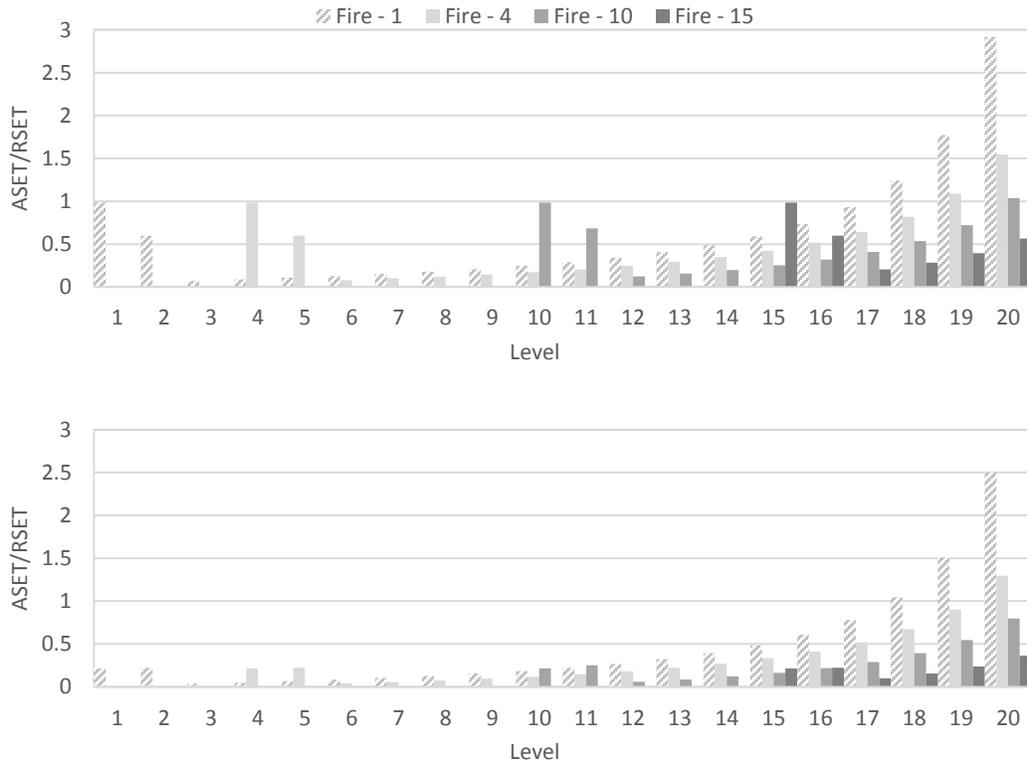
665 **Damage potential – alternative scenarios**

666 In order to better characterize the damage potential and to confirm the MDP presented in section 0, this
 667 section explores different scenario configurations based on the variables and values of Table 1 and Table
 668 3. The performance for the flat where fire originates and the corresponding level is summarized in Table 4.
 669 Although slow growth fires result in an $ASET > RSET$ for the rooms of origin, the ASET for the flat corridor
 670 is less than the RSET for the lobby and therefore in unacceptable performance. In the lobby, a slow growth
 671 fire performance is acceptable, while ultra-fast fires yield unacceptable performance (Table 4). Results
 672 indicate that even a slow growing fire provides a potential for unacceptable performance.

673 Table 4. ASET/RSET ratio for the flat and level of fire origin

Fire growth	Room of origin	ASET/RSET (flat)	ASET/RSET (level)
Slow	Kitchen	0.8	1.5
	Living	0.8	1.5
	Bedroom	0.8	1.6
Ultra-fast	Kitchen	0.2	0.6
	Living	0.2	0.6
	Bedroom	0.2	0.9

674 At the building level the scenarios evaluated consider effective compartmentation barriers (flat and
 675 staircase doors), which yield lobbies free of smoke. However, due to the vertical fire spread, flats above
 676 the flat of fire origin will be affected. Figure 10 presents the results for the performance at each level,
 677 displaying unacceptable performance for all scenarios except for the top levels (18th, 19th and 20th).
 678 Although these results seem worse than the MDP presented in section 0, in these scenarios the fire is
 679 contained at the level of origin and where it re-enters the building. Here, the ASET/RSET quantity fails to
 680 fully capture the performance of the building, despite providing insight on the evolution of fire spread
 681 through it.



682

683

684 Figure 10. Damage as a function of ASET/RSET for the flats above the level of fire origin—fire starting at 4th, 10th
 685 and 15th level. Slow fire growth above, ultra-fast fire below.

686 **6.6 Identifying remediation actions**

687 A remediation strategy is required as the damage potential and the MDP indicate an unacceptable
 688 performance. The inherently safe option has been identified in section **Error! Reference source not found.**
 689 and to provide further alternatives the information registry is explored. The registry contains the variables
 690 and assumptions that affect performance and that can be used to formulate actions to improve it.

691 The information registry is meant as a basis for third party reviews and for incident investigation while
 692 addressing the issue of assessment credibility [77] or completeness uncertainty [39] in risk assessment. In
 693 the context of this case study this issue is referred to as *trustworthiness* and it is defined as a function of the
 694 available body of evidence (Strength of Knowledge or SoK) and the sensitivity of the damage to changes
 695 in inputs or assumptions (Sensitivity⁻¹). Qualitative criteria are defined for each of the trustworthiness
 696 components using a Low/Medium/High scale (Table 5). Judging trustworthiness of individual assumptions
 697 and input values allows prioritizing them based on their impact on performance, while identifying those
 698 requiring management actions. This approach adopts the ideas of Aven [11, 78-82] and addresses the issues
 699 of accountability in FSE identified by Hackitt [5] and Shergold-Weir [6].

700 Table 5. Trustworthiness criteria and number of entries

SoK	Criteria	Sensitivity ⁻¹	Criteria
Low	Poor theoretical grounds, supporting references or low consensus between analysts	Low	Theoretical grounds for increased damage in case of changes leading to MAD breaches
Medium	Neither high nor low	Medium	Theoretical grounds for increased damage in case of changes
High	Recent references, strong and relevant theoretical grounds and agreement between analysts	High	Theoretical grounds indicate an increase in damage is not reasonable

701 The information registry contains 49 quantities employed in the damage estimation, with the distribution
 702 of SoK and Insensitivity presented in Table 6. The six quantities with low strength of knowledge pose the
 703 potential for the results of the assessment not to be trustworthy, while the 16 quantities with high output
 704 sensitivity could lead to different performances.

705 *Table 6. Number of entries for each level of SoK and Insensitivity*

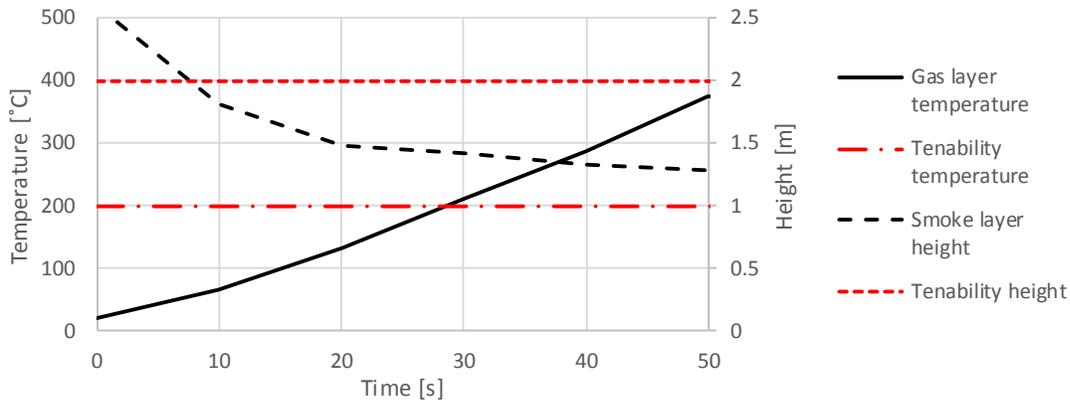
SoK	No. of entries	Insensitivity	No. of entries
Low	6	Low	16
Medium	7	Medium	12
High	28	High	13

706 Each key assumption is associated to several of the quantities involved in the assessment. As each quantity
 707 has a SoK and Precision classification, this allows identifying the assumptions with associated low SoK
 708 and low Precision. These are the results with the lowest certainty and with the greatest impact on the outputs.
 709 This is presented in Table 7, highlighting those assumptions with a significant potential for improving or
 710 worsening the performance. This allows identifying the assumptions with the potential for a better
 711 performance (fire growth, compartmentation, ignition of façade and the fire re-entry criterion) and the those
 712 that could lead to worse outcomes (external flame spread; wind effect; notification and pre-movement
 713 times; and ordered evacuation).

714 In general, evacuation strategies can be optimized to improve the performance through the implementation
 715 of reliable and sophisticated notification systems through the building [83]. On the other hand, a worse
 716 performance could result from issues in the evacuation management (e.g. confusing orders, miscommunication)
 717 resulting in increased notification and pre-movement times, as well as in disorderly
 718 behavior from the occupants, e.g. oversaturation of staircase, increased que time. For the case study
 719 analyzed here there is a minimum margin for optimization of the strategy, which combined with the
 720 assumption of a calm and orderly evacuation (A11) do not justify exploring it as a remediation action.

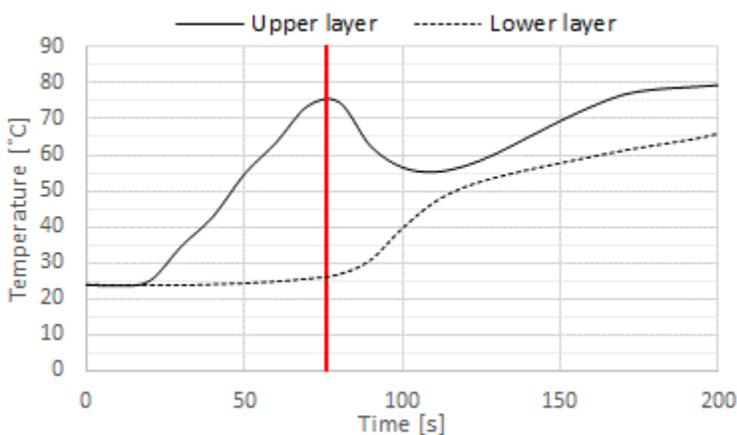
721 *Table 7. Key assumptions and trustworthiness*

Key assumption		SoK	Sensitivity ¹	Discussion
A0	Tenability criteria	H	H	An alternative criterion such as smoke layer temperature [72] at 200°C is verified using CFAST output, indicating that smoke layer height yields a more onerous result (Figure 11).
A1	Fire growth	H	L	Onerous fuel conditions were chosen assuming polyurethane as the fuel. This is consistent with fuel loads in residential settings [84]. An alternative fire model (B-Risk from BRANZ [85]) was used to verify the original simulations, showing consistency in temperatures within the compartment of origin and times for untenable conditions.
A2	Compartmentation	H	L	Past events reflect that loss of compartmentation is feasible. Unless specific evidence exist for considering compartmentation is maintained during the fire, this scenario is valid for assessing the performance.
A3	Window breakage	H	H	B-Risk model was used to estimate the temperature at which the glass breaks [86], yielding a time of 76 seconds, corresponding to an upper layer temperature of 75°C (Figure 12).
A4	External flaming	H	M	Based on the simulation results, all configurations achieve flashover in the compartment of origin, which are ventilation-controlled fires. This justifies the assumption of external flaming. A delay on external flaming could be incorporated, but it would not reflect current knowledge nor represent an onerous scenario.
A5	Ignition of façade	M	M	An optimistic estimation for this complex phenomenon would result in increased ASET. Under current knowledge and available resources, such modelling would not be accurate nor reliable. A zero seconds' delay is recognized as an onerous but valid condition for the damage potential.
A6	External flame spread (upwards)	H	M	Despite the large variability of the upwards flame spread rate, the building of this case study is similar to the Grenfell tower, for which the rate of 4 m/min was the mean value during the fire [57].
A6	External flame spread (downwards)	L	L	Real fires have shown that downwards vertical spread is possible and actively contributes to fire spread and to increase fire damage. Modelling downward spread could lead to re-entry and to faster untenable conditions at the stairs, i.e. worse performance.
A7	Wind effect	L	M	Wind can influence external flame spread, reduce vertical flame spread and promote horizontal flame spread [67]. Current knowledge for assessing wind effects on external fire spread is limited, but its potential for a worse performance is recognized [87]. A theoretical model has been proposed by Bai et al. [88], although its applicability is limited to reduced scale setups with HRR < 18 kW.
A8	Fire re-entry criterion	L	M	Gandhi et al. [51] performed a façade resistance test using similar ACP configurations to the ones in the case study, resulting in a 67 seconds delay between window exposure and fire re-entry. Including such a delay once windows are exposed to flaming would yield a better performance, but ensuring it with current available evidence is not supported.
A9	Smoke detection criterion	H	H	The 24 %/m obscuration criterion is given by default in the CFAST detection model, however it corresponds to a reasonable setting based on the analysis by Schifiliti et al. [89].
A10	Notification and pre-movement times	L	L	These quantities depend on non-observable variables such as the state of mind of occupants. The assessment used the least onerous values and yielded an unacceptable performance; increasing these times would yield even worse performances.
A11	Ordered behaviour during evacuation	L	L	Assuming a homogenous demography (adults around 40 years old) is a simplification. Panic effects or physical difficulties of particular occupants could significantly increase the RSET and therefore yield worse performances.



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723

Figure 11. Comparison of tenability criteria for ultra-fast fire originating at the kitchen



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Figure 12. Time for window breakage using B-Risk model, plotted against the temperature of upper and lower layers in the kitchen compartment; red line denotes window breakage

727 The unacceptable performance of the existing façade system could be remediated through a series of actions
 728 associated to the key assumptions. These actions are presented in Table 8 and provide flexibility in the
 729 potential remediation actions to be defined by the stakeholders, considering that their cost-effectiveness
 730 largely varies. These actions are proposed on the basis that occupancy cannot be modified. Furthermore,
 731 the active elements of the fire safety strategy (detection, notification) need to function adequately during
 732 the lifecycle of the building as an inadequate management would not only invalidate the performance
 733 assessment but could also lead to disastrous consequences, e.g. failed evacuation due to lack of detection.

734

Table 8. Treatment options based on key assumptions

Key assumption		Management actions	Description
A1	Fire growth	Control: fire load management	Replacing combustible elements like carpets and combustible wall finishes could improve performance, limited to the common areas.
A2	Compartmentation	Control: redesign of door system	Alternative door design can lead to better performance. Fire-rated doors with a gap of 3 mm could enhance smoke containment [90], although self-closing mechanisms would be needed in addition [91]. However, failed compartmentation scenarios are not fully eliminated [19].
A5	Ignition of façade criterion	Prevention: Use less or non-combustible materials for the cladding	The flame spread rate can be iterated to find a maximum allowable flame spread, found at 0.1 m/min (see section Error! Reference source not found.).
A6	External flame spread	Mitigation: flame spread barriers	Giraldo et al. [92] studies the impact of flame spread barriers on timber facades, including building's geometry. The Lacrosse fire showed how

Key assumption		Management actions	Description
			an architectural decision prevented horizontal flame spread (under specific wind conditions) [93].
A8	Fire re-entry criterion	Control: Increase time for external flaming and fire re-entry	Nguyen et al. [87] suggests insulated and laminated glass performs better than regular glass despite its increased cost. This substitution would yield an increased time for breakage and re-entry.

735 **6.7 Façade ignition and external flame spread**

736 The performance assessment results can be deemed conservative but the proposed actions align with the
737 intent of a performance-based design by providing flexibility in decision-making. This is achieved through
738 the holistic approach of the MAD methodology. As fire research provides data and models to deal with
739 some of the complex phenomena involved, the damage model employed can be updated and conservatism
740 reduced while accuracy increased. If fire research does not develop substantively then the obtained
741 information remains a valid base for decision-making without compromising the professional ethics of the
742 engineers nor shutting down the stakeholder motivations.

743 Professional ethics require consideration of stakeholder motivations and never compromising the
744 trustworthiness of technical studies. For example, a parameter such as the flame spread rate is critical in a
745 fire risk assessment and it will have considerable influence on the outcome. In this case study, 4 m/min was
746 used based on a series of full-scale real building fires and is independent of the materials used (A6).
747 Refining this value by considering specific façade materials is desirable but must be done carefully to ensure
748 that it is realistic and representative. Bench-scale flammability data from the Cladding Materials Library
749 [94] quotes a rate of 0.1 m/min to be used only as part of correlations for flame spread theory. Applying
750 this value directly would be tempting as it is a drastically lower flame spread rate and will thus often lead
751 to an acceptable performance for a given building. However, a scaling analysis is required to be able to
752 obtain a realistic value to apply to a full building, such as one by Chung and Drysdale [95].

753 Technical considerations which may appear unimportant can in reality have significant impact on the
754 overall performance of a building. The consideration above of an alternative flame spread exemplifies this
755 as using it would lead to a false safety sense and results which are not credible. The implications of this are
756 relevant in Australia and worldwide where tens of thousands of buildings await remediation after their
757 facades have been deemed non-compliant. The proposed methodology adds significant value to the
758 technical information in these situations and helps potentially prevent incalculable losses.

759 **7 Conclusions**

760 This manuscript has put forward an alternative fire risk assessment methodology, which has an explicit
761 focus on the consequences of an event. The methodology, MAD, aims at identifying the performance limits
762 of a particular building design as a function of the resulting fire damage that can jeopardize one or more
763 safety objectives such as ensuring life safety of occupants. MAD was developed on the basis of a design
764 methodology that promotes inherent safety and does not attempt to disqualify PRAs or replace them, but to
765 provide a robust risk assessment methodology that works as their precursor.

766 The proposed methodology was implemented in a non-compliant façade system for a residential high-rise
767 building in order to identify a possible remediation strategy that can be used to reduce the consequences of
768 a fire in the building. It is not an objective of this study to fully describe the physics and the complexities
769 of a façade fire but to demonstrate the value of the methodology. Therefore, the analysis tools were
770 purposely kept as simple as possible, discussing at the end the implications of assumptions and uncertainties
771 on the remediation actions. The performance assessment relies on a series of assumptions, including a
772 ‘normal’ occupation and an expected pre-movement time. These variables could take much more
773 conservative values, as in the case of high occupancy during special dates or events, e.g. over holiday
774 seasons. However, the performance results are unacceptable even under these optimistic values. Since the
775 objective of the assessment is to provide a remediation strategy for the façade, modifying these variables
776 would not yield an enhanced insight and are therefore not explored. Under a normal design process, the
777 maximum damage potential would require exploring these more conservative conditions.

778 A valid question -as highlighted by the reviewers- is why would MAD improve the fire safety designs of
779 buildings? The authors consider that MAD addresses the immaturity of QRAs in fire safety engineering,
780 currently hampered by i) lack of availability of supporting data, ii) poor competence of many practitioners
781 and iii) limited debate in the literature as to the utility and value of the QRA process in the built environment.
782 The purpose of MAD is to understand the inherent risk in a building, understanding this is largely (if not
783 solely) a function of the largest consequences attainable before introducing many of the typical fire
784 protection systems, e.g. sprinklers.

785 MAD has a common element with PRA, namely its evidence gathering capacity [96], and capitalizes on
786 delivering trustworthy information. Such information can support objective, proportional and coherent
787 decision-making regarding the fire safety strategy of a building. As stated by Watson [4], these types of
788 risk assessments (including PSA) should be understood as a part of an argument that supports safety, rather
789 than as proof positive of safety. This makes it difficult to have a mechanistic approach to risk assessments,
790 needed to foster the increasingly complex needs for developing the built environment.

791 It is clear FSE aims at designing a safer built environment. This paper has exposed that this is not guaranteed
792 by imposing any particular risk assessment methodology. Instead, a safety built environment could be
793 achieved if the existing limitations associated to risk assessments are acknowledged and a road map is set
794 to overcome them; this will not be a short-term goal as the experience of more mature disciplines have
795 shown. In the meantime, the authors consider that FSE should use alternative methodologies such as MAD
796 to extract the most value of fire engineers' skills as well as the knowledge central to the practice. Gradually,
797 this will enable a future in which more quantitative and even probabilistic risk assessments can be done with
798 a high degree of trustworthiness.

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