MINISTERIO
DE INDUSTRIA, COMERCIO
Y TURISMO

MINISTRY OF INDUSTRY, TRADE AND TOURISM

REGULATORY IMPACT ANALYSIS REPORT ON THE DRAFT ROYAL DECREE APPROVING THE REGULATION ON FIRE SAFETY IN INDUSTRIAL ESTABLISHMENTS

30 May 2023

CONTENTS

REGULATORY IMPACT ANALYSIS REPORT

EXECUTIVE SUMMARY SHEET

Ministry / Authority proposing	Ministry of Industry, Trade and Tourism. Ministry of Transport, Mobility and Urban Agenda.	**Date**	30 May 2023
Title of standard	DRAFT ROYAL DECREE APPROVING THE REGULATION ON FIRE SAFETY IN INDUSTRIAL ESTABLISHMENTS		
Report type	☒ Normal ☐ Abbreviated		
TIMELINESS OF THE PROPOSAL			
Matter regulated	This Royal Decree aims to update the regulatory framework relating to fire protection in establishments and facilities for industrial use, for which a new Regulation on fire safety in industrial establishments is approved, which repeals and replaces the previous one, approved by Royal Decree 2267/2004, of 3 December. In addition, amendments are also made to the following provisions: - the Royal Decree 513/2017 of 22 May approving the Fire Protection Facilities Regulation (RIPCI); - the Basic Document DB-SI 'Safety in event of fire' of the Technical Building Code (CTE DB-SI), approved by Royal Decree 314/2006, of March 17; - the Order of 27 July 1999 determining the conditions to be met by fire extinguishers installed in vehicles for the transport of persons or goods; - the Supplementary Technical Instructions of the Safety Regulation for refrigeration plants, approved by Royal Decree 552/2019, of 27 September, - the Royal Decree 2200/1995 of 28 December approving the Regulation on Industrial Quality and Safety Infrastructure.		
Objectives pursued	The purpose of the Regulation on Fire Safety in Industrial Establishments (RSCIEI) is to achieve a sufficient degree of safety in the event of fire in establishments and facilities for industrial use. The reason for drawing up a new fire safety Regulation in industrial establishments to replace the previous one from 2004 is due to developments in both the technical and the rest of the regulatory framework in recent years, making it appropriate to review and update the requirements laid down in the aforementioned Regulation. On the other hand, this Royal Decree also introduces amendments to Royal Decree 513/2017, of 22 May, which aims to determine the conditions and requirements of the equipment, systems and components making up active fire protection facilities. This Regulation (RIPCI) is closely linked to the Regulation on fire safety in industrial establishments. With regard to this, the Royal Decree modifies some of its para-		

	graphs in order to improve, adapt and update their content, according to the needs that have been ascertained. Regarding the amendments in the Basic Document DB-SI 'Security in the event of fire' of the Technical Building Code, the main objective of these changes is to ensure these better complement and coordinate with the fire safety regulations in industrial establishments. As regards the amendments introduced to the Order of 27 July 1999 determining the conditions to be met by fire extinguishers installed in vehicles for the transport of persons or goods, the purpose of these is to align that Order with what is indicated in the Agreement on the International Transport of Dangerous Goods by Road (ADR), as well as in Royal Decree 513/2017, of 22 May. Regarding the amendments introduced in the Supplementary Technical Instructions to the Safety Regulation for refrigeration plants, approved by Royal Decree 552/2019, of 27 September, these are specific amendments with the aim of improving and updating their content. Lastly, a new provision is introduced in Royal Decree 2200/1995, of 28 December, approving the Regulation on Infrastructure for Quality and Industrial Safety, explicitly stating that, for industrial products, the information and documentation that must accompany these must be provided, at the least, in Spanish.
Main alternatives considered	Four alternatives have been evaluated: a) Drafting a new regulation that repeals and replaces the previous one. b) Partially amending the current 2004 regulation. c) Not amending the 2004 regulation and creating supporting documents (guides) with the necessary clarifications and guidance, based on the existing regulation. d) Not doing anything. Option (a) has been chosen from the alternatives studies.
CONTENT AND LEGAL ANALYSIS	
Type of standard	Royal Decree.
Structure of the standard	The Real Decree consists of a preamble, a single article, two additional provisions, six transitional provisions, a derogatory provision and 10 final provisions. The Fire Safety Regulation is then inserted in industrial establishments, which consists of 18 articles, grouped into six chapters and their annexes.

Reports compiled	In processing this, the following reports must be gathered: - Report from the Office for Coordination and Regulatory Quality (OCCN). - Report from the General Technical Secretariat of the Ministry of Industry, Trade and Tourism. - Report of the Subdirectorate-General for International Relations and Cooperation. - Mandatory report from the Technical General Secretariat of the Ministry of Transport, Mobility and Urban Agenda, as the co-proposing ministerial department of the project. - Reports from the Technical Secretariat-General of the Ministry of the Interior. - Report from the Ministry of Territorial Policy as regards compliance with the constitutional order for the distribution of competences. - Report from the Standing Committee for the Coordination of the Transport of Dangerous Goods. - Report from the Industrial Security Coordination Council. - Prior approval of the Ministry of Finance and Civil Service. - Opinion of the Council of State.
Prior consultation	A previous public consultation was performed to prepare the text in accordance with Article 26.2 of Law 50/1997, of 27 November, of the Government. This consultation was launched on 11 March 2020 and, due to the exceptional situation due to the COVID-19 pandemic, the deadline for participation was extended until 20 July 2020.
Hearing	The draft Royal Decree was published on the MINCOTUR website in order to give a hearing to interested parties in accordance with Article 26.6 of Law 50/1997. The deadline for submitting declarations during the hearing and public information was open from 22 September to 22 October 2022. Specifically, the Directorates-General competent in the field of Industry of the different Autonomous Communities and Autonomous Cities were notified; the main associations in the field of industrial safety with which the proposing Subdirectorate and the professional associations are in contact.

IMPACT ANALYSIS		
COMPLIANCE WITH THE DISTRIBUTION OF POWERS	This provision is issued under the provisions of Article 149.1.13 of the Spanish Constitution, which confers on the State the competence to determine the basis and coordination of the general planning of economic activities.	
ECONOMIC AND BUDGETARY IMPACT	General impact on the economy.	Not significant.
	With regard to competition	☒ The standard has no significant impact on competition. ☐ The standard has positive effects on

		competition. ☐ The standard has negative effects on competition.		
	From the point of view of administrative burdens	☒ It entails a reduction in administrative burdens. Estimated quantification: €3,712,500 per annum. ☐ It incorporates new administrative burdens. Estimated quantification: _____ ☐ It does not affect the administrative burdens.		
	From a budgetary point of view, the standard: ☐ Affects the budgets of the State Administration. ☐ Affects the budgets of other regional authorities.	☒ It does not entail an increase in spending, to the extent that it is limited to regulating certain aspects already existing. ☒ It does not entail an income.		
GENDER IMPACT	The gender impact of the standard is	☐ Negative	☒ Non-existent	☐ Positive
IMPACT ON CHILDREN AND ADOLESCENTS	The standard has an impact on childhood and adolescence	☐ Negative	☒ Non-existent	☐ Positive
IMPACT ON THE FAMILY	This standard has an impact on families.	☐ Negative	☒ Non-existent	☐ Positive
OTHER IMPACTS CONSIDERED	The impact on SMEs is deemed non-existent. The competitive impact is deemed non-existent. The impact due to climate change and the energy transition is deemed non-existent.			
OTHER CONSIDERATIONS	None.			

1. TIMELINESS OF THE PROPOSAL

a) Background

The needs of this Royal Decree are to update the regulatory framework on fire protection in establishments and facilities for industrial use, for which a new Regulation on fire safety in industrial establishments (RSCIEI) is approved, which repeals and replaces the previous one, approved by Royal Decree 2267/2004 of 3 December.

The purpose of the Regulation on fire safety in industrial establishments is to achieve a sufficient degree of safety in the event of fire in establishments and facilities for industrial use. To achieve this, the regulations in force so far, in 2004, establish the requirements that these establishments must comply with, in order to prevent the occurrence of fires or, if this is not possible, their spread is limited and their extinction is possible, minimising the damage that the fire may cause.

However, in view of developments both in the technical progress and in the Community and national regulatory framework in recent years, it is appropriate to review and update the requirements laid down in that regulation in order to prevent them from becoming outdated, while at the same time seeking to optimise and improve their content. For this purpose this Royal Decree approves a new Regulation on fire safety in industrial establishments, which repeals and replaces the previous one.

Lastly, the Royal Decree also introduces specific amendments to other regulations, which are explained later.

a) Objectives

This proposal for a Royal Decree aims to update the aforementioned technical regulations that better are adapted to the needs, possibilities and technical solutions currently available for industrial establishments.

The new Regulation on fire safety in industrial establishments maintains the same approach as the previous one, seeking to prevent the occurrence of fires in industrial establishments and, if this is not possible, limit their spread and enable their extinction, minimising the damage that the fire can cause to people, goods and the environment.

The ultimate objective is to achieve an adequate level of fire safety in industrial establishments.

In addition, specific amendments are also made to other regulations, which are detailed below:

Amendments are made to Royal Decree 513/2017 of 22 May approving the Fire Protection Facilities Regulation (RIPCI), which aims to determine the conditions and requirements of the equipment, systems and components that make up active fire protection facilities. This regulation is closely linked to the Regulation on fire safety in industrial establishments. With regard to this, this Royal Decree is limited to amending some of its paragraphs with the aim of improving, adapting, correcting errors and updating their content, in accordance with the needs that have been detected, as well as aligning it with the new RSCIEI that is approved with this Royal Decree.

Regarding the alterations made in the Basic Document DB-SI 'Security in the event of fire' of the Technical Building Code (CTE DB-SI), approved by Royal Decree 314/2006, of 17 March, the main objective of the changes is to achieve a better complementation and coordination of this with the fire safety regulations in industrial establishments. These amendments have been developed in an agreed manner after studying both regulations as a whole by the Ministries of Transport, Mobility and Urban Agenda, and Industry, Trade and Tourism.

As regards the amendments introduced to the Order of 27 July 1999 determining the conditions to be met by fire extinguishers installed in vehicles for the transport of persons or goods, the purpose of these is to align that Order with what is indicated in the Agreement on the International Transport of Dangerous Goods by Road (ADR), as well as in Royal Decree 513/2017, of 22 May. This Order establishes the minimum number and minimum classification of extinguishers to be carried by vehicles required in accordance with the General Vehicle Regulation, without prejudice to what may be established in other specific regulations. Under the Europe Agreement on the Transport of Dangerous Goods by Road (ADR), which is mandatory for both domestic and international transport, vehicles for transporting hazardous goods are required to carry a specific envelope of means of extinction, defined in accordance with other criteria. In order to facilitate compliance by these vehicles both with the General Vehicle Regulation and, where appropriate, with the ADR Agreement, it has been deemed appropriate to amend the requirements for extinguishers that may be extinguished for vehicles for the carriage of goods in general, by adding as an alternative the envelope required by that Agreement.

Regarding the amendments introduced in the Supplementary Technical Instructions to the Safety Regulation for refrigeration plants, approved by Royal Decree 552/2019, of 27 September, these are specific amendments with the aim of improving and updating their content in several aspects that have been found appropriate.

Lastly, a new provision is introduced in Royal Decree 2200/1995, of 28 December, approving the Regulation on Infrastructure for Quality and Industrial Safety, to explicitly indicate that for industrial products, the information and documentation that must accompany them (such as the contact details of economic agents or instructions) must be provided, at the least, in Spanish. This requirement is not new, however, and it is deemed appropriate to include this explicitly in Royal Decree 2200/1995, of 28 December, so that it is better reflected horizontally for all industrial products.

b) Analysis of alternatives

Four possible alternatives have been considered in relation to updating, repealing or replacing the previously in force Regulation on fire safety in industrial establishments, approved by Royal Decree 2267/2004, of 3 December.

The alternatives assessed are as follows:

a) Drafting a new regulation that repeals and replaces the current one, approved by Royal Decree 2267/2004, of 3 December.

b) Partially amending the current regulation, approved by Royal Decree 2267/2004, of 3 December.

c) Not amending the regulation, and creating supporting documents (guides) with the necessary clarifications and guidance, based on the existing regulation.

d) Not doing anything.

Of the alternatives studied, we opted for the **option a) *Drafting a new regulation that repeals and replaces the previous***, for the following reasons:

- As regards option d) *Do nothing*, it is not considered an appropriate option, since, as explained above, changes due to developments in both the technical and the regulatory framework must be considered in the regulation, in order to avoid this becoming obsolete.

- With regard to option (c) *Not amending the regulation, and creating supporting documents*, it should be noted that a guide to Royal Decree 2267/2004 of 3 December already exists on the Ministry's website, where clarifications and guidance on the regulations that are deemed appropriate are made available to citizens to help resolve queries and facilitate their application. This document also contains information on changes and developments in the technical and regulatory framework that may influence the application of the regulation, such as possible recent changes in product legislation (such as CE marked products) that the current regulation does not provide for, among others. However, while this guide has been very useful in recent years as a means of providing guidance and clarification, it is insufficient for the objectives to be achieved, and amending the regulation itself is therefore necessary.

- With regard to option (b), *Partially amending the current regulation*, this is deemed to be an inappropriate option, since due to the number of changes to be made and the technical na-

ture of the regulation itself, making a partial amendment would be complex both in the formal and the technical part.

Therefore, it is deemed that the best option is to rewrite the regulation completely, on the basis of the previous regulation of 2004 and by carrying out a full revision of it.

With regard to the amendments introduced in Royal Decree 513/2017 of 22 May approving the Regulation on Fire Protection Facilities, this Royal Decree merely amends some of its paragraphs in very specific respects. These amendments are related to technical aspects where a need for improvement, adaptation or updating of their content has been identified. The same also applies to the other amendments made to the other legislative provisions referred to above.

c) Adherence to the principles of sound regulation

This standard has been drawn up in consideration of the principles for good regulation set out in Article 129 of Law 39/2015 of 1 October on common administrative procedures in public administration.

In particular, the principles of necessity and effectiveness are complied with by considering that the adoption of this Royal Decree is the necessary and appropriate instrument to achieve the objectives pursued.

The principle of proportionality is deemed to have been complied with since the Royal Decree contains the rules necessary to meet its purpose.

The principle of legal certainty is guaranteed, since this standard is consistent with the rest of the legal system, and efforts were made to ensure that it is clear and that it facilitates implementation and decision-making for persons and companies.

Transparency, because in its drafting process all the required reports have been requested and published on the website of the Ministry of Industry, Trade and Tourism, in order to enable potential recipients to participate actively in the aforementioned process. Furthermore, prior to drafting this Royal Decree, a public consultation was held, as indicated in Article 26.2 of Law 50/1997 of 27 November, of the Government.

Lastly, with regard to the principle of efficiency, unnecessary administrative burdens have been avoided and efforts have been made to streamline the management of public resources in its implementation.

d) Inclusion in the Annual Regulatory Plan

This Royal Decree is not included in the Annual Regulatory Plan of the General State Administration for 2022 (the year in which it went to a public hearing). This is due to the fact that its processing is not expected to be completed before 31 December of this year. It is nevertheless expected to be included in the Plan for the coming years.

2. CONTENT

The draft Royal Decree consists of a preamble, a single article, two additional provisions, six transitional provisions, one derogatory provision and 10 final provisions:

The **single article** explicitly approves the Regulation on fire safety in industrial establishments, as well as its annexes.

The **additional provision first** deals with the enforcement regime of this regulation to industrial establishments existing beforehand, and details which parts of the regulation must comply with all industrial establishments and which apply only to new establishments, or to those that move or modify their activity.

The second additional provision contains the Mutual Recognition Clause under Regulation (EU) 2019/515 on the mutual recognition of goods lawfully marketed in another Member State, and repealing Regulation (EC) No 764/2008.

The **first transitional provision** deals with the enforcement regime for industrial establishments under construction at the time of the entry into force of this Royal Decree.

The **second transitional provision** addresses the enforcement regime for projects of equivalent security or performance design while there are no supervisory bodies.

The **third transitional provision** establishes adaptation deadlines for supervisory bodies carrying out inspections, and that were authorised prior to the entry into force of the Royal Decree.

La **fourth transitional provision** establishes validity periods for periodic inspections carried out in accordance with Royal Decree 2267/2004, of 3 December.

The **fifth transitional provision** establishes the transitional deadlines for the application of the amendments made to the Fire Protection facilities Regulation.

The **sixth transitional provision** establishes the transitional deadlines for the application of the amendments made to the Technical Building Code.

The **single derogatory provision** establishes that Royal Decree 2267/2004 of 3 December approving the Regulation on fire safety in industrial establishments is repealed, as well as any provisions of equal or lower rank contradicting the provisions of this Royal Decree.

The **first final provision** includes that this Royal Decree constitutes a regulatory standard of industrial safety, which is issued under the provisions of Article 149.1.13 of the Spanish Constitution.

The **second final provision** enables the holder of the Ministry of Industry, Trade and Tourism to dictate the necessary provisions for the development and compliance of this Royal Decree.

The **third final provision** authorises the Directorate-General for Industry and Small and Medium-sized Enterprises to draw up a non-binding technical guide to facilitate the practical application of the regulation.

The **fourth final provision** refers to the technical standards (standards UNE refers to the technical standards (UNE and other internationally recognised standards) that will be cited later in the regulation, and provides that the list of standards can be updated in order to facilitate adaptation to the state of the art at all times.

The **fifth final provision** includes the amendments that are made to the Regulation of fire protection facilities, approved by Royal Decree 513/2017, of May 22.

The **sixth final provision** includes the amendments that are made in the Basic Document DB-SI 'Security in the event of fire' of the Technical Building Code, approved by Royal Decree 314/2006, of March 17.

The **seventh final provision** includes the amendments made to the Order of 27 July 1999 determining the conditions to be met by fire extinguishers installed in vehicles for transporting persons or goods.

The **eighth final provision** includes the amendments that are introduced in the Supplementary Technical Instructions of the Safety Regulation for refrigeration plants, approved by Royal Decree 552/2019, of 27 September.

The **ninth final provision** includes the amendments introduced in Royal Decree 2200/1995 of 28 December approving the Infrastructure Regulation for Quality and Industrial Safety.

The **tenth final provision** establishes the entry into force of the Royal Decree, giving a sufficient period of time between the publication of the text in the Spanish Official State Gazette and its entry into force, that allows citizens to be aware of and prepare the adaptation that may be necessary to the new text, before it enters into force.

In this way, given the length, complexity and marked technical nature of the text, it is understood that this period of six months from the publication in the Spanish Official State Gazette until the entry

into force, without prejudice to the transitional provisions also included in the Royal Decree, should be left, and that establish additional deadlines for specific situations.

Subsequently, the **Fire Safety Regulation is included in industrial establishments**, which is approved by this Royal Decree and consists of 18 articles, grouped in six chapters:

Chapter I ('General Provisions'), with four articles dedicated to **object, scope, definitions and regulatory compatibility.**

As new developments in this chapter with respect to the previous regulation to be repealed, it should be noted that the subject matter of the regulation and its scope has been rewritten, updating and detailing its content. A new article concerning definitions has also been added.

With regard to the article on the scope of application, it should be noted that this states that the scope of the regulation is industrial establishments (detailing this concept later). The regulation will apply to new industrial establishments that are built or established. It will also apply to previously existing industrial establishments, where certain situations arise (e.g. if certain extension or refurbishment works are carried out).

Regarding the article on definitions, a number of general definitions are included that are considered useful that are explicitly compiled, such as *Industrial Establishment*, *Industrial Storage*, *Competent*, *qualified Expert Person or Significant amendments*.

Specifically, regarding the definition of *competent qualified expert person*, it should be noted that the new regulation follows the same way of functioning as had the previous 2004 regulation (*competent qualified*) which it replaces, without making changes. The definition that has been added is already contained in a Market Unit Agreement and applies in a cross-cutting manner to all industrial safety regulations (In those industrial safety regulations where a competent expert is required to perform certain duties such as drafting and signing the projects of the facilities or carrying the direction of subsequent works or in which it is established as a requirement of installation companies, repairers, etc., to have a expert competent to be able to be qualified and to carry out his work as such, it should be understood that a 'competent expert' is a university graduate with specific competences in the subject matter of the relevant regulation). Note that the definition does not limit specific qualifications, but that, in any event, with regard to the application of Law 21/1992 of 16 July on Industry, the doctrine of the Supreme Court which establishes that the principle of suitability over exclusivity prevails; and with regard to the application of Law 38/1999, of 5 November, on the Building Regulations, that which is indicated in the law itself applies.

Chapter II ('Requirements to be met by industrial establishments') with five articles: **Compliance with the regulations; Basic safety requirements in the event of fire; Characterisation; Construction**

requirements and determining protection facilities; and Requirements for construction products and fire protection facilities.

As new developments of this chapter, these articles have been reordered, rewritten and updated to adapt them to the current regulations and to be more detailed, in particular as regards the basic requirements to be met, as well as the requirements and documentation that construction products must have, such as the documentation relating to the CE marking.

Chapter III ('Construction, commissioning, operation and maintenance') with three articles: **Construction and set-up projects; Commissioning; and Operation, maintenance and alterations.**

As new developments of this chapter, it should be noted that the present regulation has further developed the possibility of using 'equivalent safety techniques' or 'provisional design' for certain particular cases that may exist where greater flexibility is needed, while maintaining the security required in the establishment (note that the previous regulation already allowed an option to use 'equivalent safety techniques', while with the new regulation this is further deepened and detailed rules are established to make its application clearer). On the other hand, a new article on operation, maintenance and alterations has also been added.

The Chapter IV ('Inspections') with three articles dedicated to periodic **inspections, special inspection programmes and corrective measures.**

New developments in this chapter include the alteration considered in the periodicity of periodic inspections, re-adjusting their periodicity and adding in the regulation in some cases an initial inspection for commissioning, which is contemplated in the previous Chapter III.

Chapter V ('Action in event of fire') with two articles dedicated to **fire communication and fire investigation.**

Chapter VI ('Sanctions Regime') with an article dedicated to **infringements and penalties**.

Lastly, the **annexes** of the regulation are included, which are as follows:

Annex I ('CHARACTERISATION OF INDUSTRIAL ESTABLISHMENTS') details how to characterise industrial establishments in relation to fire safety. This is divided into the following sections:

1. Classifying buildings and open spaces according to their layout
2. Identifying fire sectors and areas.
3. Characterising fire sectors and areas according to their intrinsic risk level.

As new developments in this annex compared to the previous regulation, the text has been rewritten and reordered so that, following a system similar to that already provided for in the previous regulation, the new text is more detailed and easier to apply, is more precise, and at the same time avoiding possible ambiguities in its content. Tables with reference values have also been reworked.

Annex II ('CONSTRUCTION REQUIREMENTS OF INDUSTRIAL ESTABLISHMENTS') describes the construction requirements to be met by industrial establishments in relation to their fire safety. This is divided into the following sections:

I. Definitions.

II. Behavioural conditions in the event of fire with construction products and construction elements.

III. Locations not permitted.

Part 1. Internal spreading.

Part 2. External spreading.

Part 3. Evacuating occupants.

Part 4. Intervention by firefighters.

Part 5. Structural fire resistance.

As new developments in this annex, all its contents have been revised to adapt it to the technique and the rest of the current regulatory framework, and in addition, the sections have been reordered to provide them with greater clarity.

Annex III ('EQUIPMENT REQUIREMENTS FOR ACTIVE PROTECTION FACILITIES AGAINST FIRES IN INDUSTRIAL ESTABLISHMENTS') describes requirements for the provision of active fire protection facilities (equipment, systems and components) of industrial establishments.

This is divided into the following sections:

I. Definitions.

1. Fire detection and alarm systems.

2. Fire-water supply systems.

3. Fire-hydrant systems.

4. Fire extinguishers.

5. Equipped fire-hydrant systems.

6. Dry-column systems.

7. Fixed automatic-extinguishing systems.

8. Smoke and heat monitoring systems.

9. Emergency lighting.

10. Signalling the means of protection.

As new developments in this annex, its content has been revised in order to adapt this to the current technical and regulatory framework. It should be noted that the compatibility with the provisions of Royal Decree 513/2017 of 22 May approving the Regulation on Fire Protection Facilities (RIPCI) has been aligned and improved.

Annex IV ('AREAS WITH PARTICULAR CONDITIONS') includes unique cases of areas or parts of establishments which, by virtue of their characteristics, may differ partially from the characterisation of Annex I or from the requirements of Annexes II and III, or which require specific considerations.

In this way, specific considerations are set out in Annex IV for the following cases:

1. Storage with storage systems on metal shelves.

2. Elevated walkways and mezzanines.

3. Open spaces featuring supporting structures of enclosures formed by textile elements.

4. Storage of specific products.

5. Cold-store rooms.

6. Facilities located on roofs of buildings.

Lastly, **Annex V ('RELATIONSHIP OF UNE STANDARDS AND OTHERS RECOGNISED INTERNATIONALLY')** contains the list with the references of standards cited throughout the regulation.

3. LEGAL ANALYSIS

a) Legal Basis

The proposal falls within the scope of Law 21/1992 of 16 July on industry, Article 1 of which states that: 'The purpose of this Law is to establish the basis for managing the industrial sector, as well as the criteria for coordination between public administrations, in accordance with the provisions of Article 149.1. (1) and (13) of the Spanish Constitution'. Article 2 also provides that: 'The object set out in the previous Article shall be specified in the pursuit of the following purposes: (...) 3. Industrial safety and quality (...)'.

At the same time, as regards buildings where industrial establishments may be located, the Regulation on fire safety in industrial establishments also develops the basic requirement of the building 'Safety in the event of fire', set out in Article 3.1.b.2) of Law 38/1999, of 5 November, on Building Regulations.

Similarly, the amendment of the Basic Document DB-SI of the Technical Building Code is also approved, on the basis of the aforementioned Law 38/1999, of 5 November.

For its part, the amendment of the Order of 27 July 1999 determining the conditions to be met by fire extinguishers installed in vehicles for transporting persons or goods, is based on Royal Decree 2822/1998 of 23 December approving the General Vehicle Regulation.

b) Regulatory status

Regarding the status of the proposal, it is deemed that a draft regulation with the status of royal decree is the appropriate instrument, since it replaces, repeals or amends other legal provisions of equal or lower status.

It is worth mentioning, with regard to the amendment introduced in the Order of 27 July 1999, that the third final provision of Royal Decree 2822/1998 of 23 December approving the General Vehicle Regulation empowers the then Minister of Industry and Energy, the current Minister of Industry, Trade and Tourism, to amend by Order the annexes to that Royal Decree, including the Order of 27 July 1999.

The status of the projected standard is equal to or greater than that of the standards being amended.

In addition, there is no reservation of material or formal law in this matter that requires that its regulation be carried out by means of a legal provision, with its approval by royal decree being sufficient.

Lastly, since the draft contains provisions of a marked technical nature, the law is not the ideal instrument for its regulation.

c) Tying in with national and European Union law

- *Spanish legal regulation*

The current Regulation on fire safety in industrial establishments, approved by Royal Decree 2267/2004, of 3 December, as well as this Royal Decree that will replace it, as well as Royal Decree 513/2017 of 22 May, Royal Decree 552/2019 of 27 September and Royal Decree 2200/1995, of 28 December, all have their legal coverage in Law 21/1992, of 16 July, Article 12.5 of which stipulates that national industrial safety regulations will be approved by the Government of the Nation, without prejudice to the fact that the Autonomous Communities, with legislative competence over industry, may introduce additional requirements, in the case of facilities located in their territory. In addition, as indicated above, with regard to buildings where industrial establishments might be located, as well as to the amendment of the Basic Document DB-SI of the Technical Building Code, Law 38/1999, of 5 November, is implemented. For its part, the Order of 27 July 1999 is part of Royal Decree 2822/1998 of 23 December.

The Royal Decree is covered by Article 97 of the Constitution, concerning the attribution of the Government for the exercise of regulatory powers, specified in Article 5 (h) of Law 50/1997 of 27 November in favour of the Council of Ministers.

Thus, the status provided for in the standard (Royal Decree, approved by the Council of Ministers) is correct, since Article 24 of Law 50/1997 of 27 November states that the decisions of the bodies governed by this law take, inter alia, the forms of royal decrees approved in Councils of Ministers, which adopt regulations governing competition.

It therefore follows that the proposed standard, of a technical nature, has a legal basis in the aforementioned laws.

- *Legal regulation of the European Union.*

This Royal Decree is not directly related to the regulations of the European Union.

However, it is worth mentioning several European provisions that influence its content, highlighting among them the following: Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 laying down harmonised conditions for the marketing of construction products; Regulation (EC) No 765/2008 of the European Parliament and of the Council of 9 July 2008 laying down requirements for accreditation and market surveillance relating to the marketing of products and repealing Regulation (EEC) No 339/93; Regulation (EU) 2019/515 of the European Parliament and of the Council of 19 March 2019 on the mutual recognition of goods lawfully marketed in

another Member State and repealing Regulation (EC) No 764/2008; and Regulation (EU) 2019/1020 of the European Parliament and of the Council on market surveillance and conformity of products and amending Directive 2004/42/EC and Regulations (EC) No 765/2008 and (EU) No 305/2011

d) Repeal of regulations

Royal Decree 2267/2004 of 3 December approving the Regulation on fire safety in industrial establishments, is repealed and replaced.

Likewise, any provisions of equal or lower status contradicting the provisions of this Royal Decree are repealed.

e) Entry into force

This Royal Decree shall enter into force six months after its publication in the Official State Gazette.

For the purposes of Article 23 of Law 50/1997 of 27 November of the Government, it should be noted that it has been decided to set the date of entry into force of this Royal Decree at a total of six months from the date of its publication in the Official State Gazette, which is done with the aim of ensuring that there is a sufficient period between the time at which the Royal Decree is published and the time at which it enters into force. This is because, given the length and technical nature of the content of the Royal Decree, the date of entry into force contemplated is deemed appropriate for to facilitate adaptation to it.

In addition to the above, for certain particular situations additional transitional periods are provided for in the transitional provisions, in cases where it is deemed appropriate to give a longer period. Similarly, an additional transitional period has been established for the application of the amendments made to the Fire Protection Facilities Regulation, leaving a period of up to two years for some of the changes since the entry into force of the Royal Decree, in order to facilitate adaptation to the new requirements.

4. ADAPTATION OF THE STANDARD TO THE ORDER OF DISTRIBUTION OF POWERS

This Royal Decree is issued under the provisions of Article 149(1)(13) of the Spanish Constitution, which confers exclusive competence on the State in matters of bases and coordination of the general planning of economic activity.

It is worth mentioning Law 21/1992, of 16 July, on Industry, in Title III, 'Industrial safety and quality'. In particular, Article 12(5) of the Act provides that: 'The regulations of industrial safety at the state level shall be approved by the Government of the Nation, without prejudice to the fact that the Autonomous Communities, with legislative competence over industry, may introduce additional requirements on the same matters in the case of facilities located in their territory'.

The central part of the regulation contained in the Royal Decree envisaged is, for competition purposes, brought back to the field of 'Industry' and, in particular, to that of 'industrial safety'. Although the aforementioned subject 'Industry' is not explicitly mentioned in Articles 148 and 149 of the Constitution, State powers in this matter derive from those generally conferred on the State by Article 149(1). (13) Constitution on 'Bases and coordination of the overall planning of economic activity'.

For their part, the Autonomous Communities have regulatory powers of development and enforcement in the field of industry, without prejudice to that which is determined by state rules for reasons of safety, health or military interest, and those related to industries subject to the legislation of mines, hydrocarbons and nuclear energy.

The Constitutional Court, in STC 203/1992, stated that *'in the fundamental core of the field of "industry" include, among others, activities aimed at the management of industrial sectors, the regulation of industrial or manufacturing processes and, more precisely in the sub-matter of industrial safety, activities related to the safety of industrial facilities and establishments and the industrial processes and the products produced therein'*.

5. DESCRIPTION OF THE PROCEDURE.

In accordance with Article 26 of Law 50/1997 of 27 November of the Government, the following procedures are required:

5.1 PROCEDURES CONDUCTED

1. **Initial authorisation** of the General Secretariat for Industry and Small and Medium-sized Enterprises, granted on 21 January 2020.

2. A **previous public consultation** was performed to prepare the text in accordance with Article 26.2 of Law 50/1997, of 27 November, of the Government.

The contents of the consultation set out the current situation, the reasons for the possible elaboration of a future regulatory text, its need, timeliness, objectives and the different alternatives.

The prior public consultation was launched on 11 March 2020 and was scheduled to be completed on 1 April 2020. However, due to the exceptional situation caused by the COVID-19 pandemic, it was deemed appropriate to extend the deadline to participate until 20 July 2020, to allow those who had not given it time to participate, due to the situation that the country experienced during those dates.

All information about the consultation was published on the Ministry's website, via the following link:

https://industria.gob.es/es-ES/participacion_publica/Paginas/DetalleParticipacionPublica.aspx?k=305

Nearly 50 responses were received from both the main associations related to the sector, as well as from companies and individuals, both from the professional and consumer sectors. An extract of these is shown in the **Annex I** of this document.

3. The project was published on the MINCOTUR website in order to **hear** stakeholders in accordance with Article 26.6 of Law 50/1997. The time limit for submitting submissions was from Thursday, 22 September 2022, to Saturday, 22 October 2022.

The website with the details of the Hearing and public information can be found at the following link:

https://industria.gob.es/es-es/participacion_publica/Paginas/DetalleParticipacionPublica.aspx?k=549

Specifically, the Directorates-General competent in the field of Industry of the different Autonomous Communities and Autonomous Cities were notified; the main associations in the field of industrial safety with which the proposing Subdirectorate and the professional associations are in contact.

Around 80 response letters were received with comments, from both the main associations and organisations related to the sector, as well as from professional associations, companies and individuals.

After assessing the submissions received, the initial proposal was revised by making specific changes to the text of the draft Royal Decree focused on responding to the comments received, as well as correcting errors and introducing improvements in the text.

The **Annex II** of this document presents a summary of the submissions received together with their corresponding assessment.

5.2 NEXT STEPS IN THE PROCESSING

During the processing, the following reports are expected to be requested:

- Report from the Office for Coordination and Regulatory Quality (OCCN).
- Report from the General Technical Secretariat of the Ministry of Industry, Trade and Tourism.
- Report of the Subdirectorate-General for International Relations and Cooperation.
- Mandatory report from the Technical General Secretariat of the Ministry of Transport, Mobility and Urban Agenda, as the co-proposing ministerial department of the project.
- Reports from the Technical Secretariat-General of the Ministry of the Interior.
- Report from the Ministry of Territorial Policy as regards compliance with the constitutional order for the distribution of competences.
- Report from the Standing Committee for the Coordination of the Transport of Dangerous Goods.
- Report from the Industrial Security Coordination Council.
- Prior approval of the Ministry of Finance and Civil Service.
- Opinion of the Council of State.

6. IMPACT ANALYSIS

6.1 General economic impact

The purpose of this analysis is to study the impact on the economic aspects derived from the draft Royal Decree.

This legal provision has a marked technical nature, and the changes that are introduced in it to the current legislation are mainly intended to adapt it to the progress of the technique and the regulatory framework of the European and Union and Spain. Its approval will not have any significant economic impact on the Spanish economy as a whole.

6.2 Impact on competition

This Royal Decree will not have significant impacts on competition, since it merely updates the current regulation on this issue, to adapt this to the progress of the technique and to better adapt it to what is established in the regulatory framework. There are no restrictions on competition in any of its major features: number of market players, ability and incentives to compete.

6.3 Impact on Market Unit

This Royal Decree complies with the principle of market unity avoiding any fragmentation in the Spanish market so it can be said that it complies with the provisions of Law 20/2013 of 9 December on the guarantee of market unity.

6.4 Impact on SMEs

The study of the impact that the regulation has on SMEs is especially important in Spain, where Small and Medium Enterprises represent 99.9 % of the Spanish business landscape, with its contribution to Gross Added Value of approximately 58 % and 63 % to total employment, so its activity is crucial to determine the progress of the Spanish economy.

In order to assess the impact of the proposed amendment on SMEs, reference has been made to the indications in the Methodological Guide for preparing the report of the regulatory impact analysis.

This standard does not have a significant impact on SMEs as it does not incorporate a higher processing burden for economic operators. The amendments included with respect to the regulations in force previously do not include additional charges to SMEs, so it is understood that it is not necessary to carry out the SME Test.

On the other hand, it should be noted that the regulation provides for specific measures and derogations for small establishments, such as a partial derogation for those whose fire load density does not exceed 42 MJ/m^2 provided that its surface area is less than a certain value. In these cases, it will be sufficient to comply with the provisions of Annex III on fire extinguishers and emergency lighting, and to comply with a number of conditions. Similarly, for construction, the project can be replaced with a technical report if the industrial establishments have an area below a certain value and meet a number of conditions.

6.5 Budgetary impact

This measure has no budgetary impact, as the project is expected to have no effects on public expenditure and revenue, both non-financial and financial.

6.6 Impact of administrative burdens

To the extent that this Royal Decree replaces the Royal Decree 2267/2004 of 3 December approving the Regulation on fire safety in industrial establishments, and also introduces some amendments to Royal Decree 513/2017 of 22 May and other regulatory provisions, the following should be noted:

The new text does not incorporate substantial changes in the requirements collected with respect to the text currently in force, but represents an altered focused mainly on improving the current text, where the requirements have been updated to the current state of the art, the fitting and references of the text have been revised with respect to the current regulatory framework and has sought to optimise and improve its content.

Thus, the Royal Decree in question contains administrative burdens similar to those currently existing.

The following should be noted concerning the text's content:

- Chapter IV readjusts the frequency of periodic inspections with respect to the previous regulation. This change for establishments might lead to a decrease in the number of periodic inspections to be carried out, depending on their size and characteristics. On the other hand, an initial inspection has been added in certain cases at the time of constructing (commissioning) the establishment, which is provided for in Chapter III. With regard to the introduction of the new initial inspections (only for some new establishments when commissioned); these types of inspections seek to ensure that the technical requirements of the regulation are met from the outset, helping to ensure their safety, and also facilitating subsequent periodic inspections, which will now have more information to monitor the establishment, as there is a previous initial inspection. In conclusion, this proposed change for inspections (initial and regular) is expected to improve the effectiveness of the regulation, while the readjustment does not increase total loads as a whole.

- With regard to the amendments made to the other regulations, and especially in Royal Decree 513/2017 of 22 May, these are mostly of technical content and aim to improve, adapt and update small parts of their content, not assuming significant changes in the content of the aforementioned regulation. The same applies to the amendments made to the other regulatory provisions contained in the Royal Decree.

a) Increase in administrative burdens

As mentioned above, in certain cases a new initial inspection is introduced, which must be carried out when certain industrial establishments complying with specific conditions are constructed (on

commissioning). This initial inspection will only apply to certain establishments (the largest and most complex).

b) Reduction of administrative burdens

The frequency of periodic inspections of industrial establishments is changed from what is indicated in the current 2004 regulation. These will now become every five years, whereas before they were every two, three or five years, depending on the establishment.

Taking the above points into account, a table with the measurement of these loads is detailed below:

A. NEW ACTION PROVIDED FOR IN THE ROYAL DECREE	TYPE OF ADMINISTRATIVE LOAD	UNIT COST *1	FREQUENCY *2	POPULATION *3	TOTAL NEW BURDENS
Initial inspections	Audit or inspections by external organisations or professionals	€1,500	One-off (1/20) *2B	27,500	2,062,500
Periodic inspections			1/5	110,000	33,000,000
					…… Total: 35,062,500

B. ACTION REMOVED FROM THE PREVIOUS ROYAL DECREE	TYPE OF ADMINISTRATIVE LOAD	UNIT COST *1	FREQUENCY *2	POPULATION *3	TOTAL REDUCTION OF BURDENS
Periodic inspections	Audit or inspections by external organisations or professionals	€1,500	1/2	5,500	4,125,000
			1/3	16,500	8,250,000
			1/5	88,000	26,400,000
					…… Total: 38,775,000

Notes:

*1 Reference value of the unit cost of the activity, for the purpose of calculating burdens.

*2 Frequency of activity, on an annual basis. It is indicated that the activity is one-off (only performed once), or, the frequency of the activity (1/2 = once every two years, 1/3 = once every three years, 1/5 = once every five years).

*2B To make the estimate of annual costs, a 20-year operation period of the establishment is taken as a reference, distributing the initial charges (one-off cost) during that period, for the purpose of calculating the annual cost (1/20).

*3 Approximate estimate of establishments that would require such inspections, according to the criteria established for each case (estimating a total of 110,000 establishments).

With this reorganisation of inspections, the total burdens thus remain similar. In total, savings of €3,712,500 per annum are expected.

6.7 Gender impact

In conformity with Article 26(3)(f) of Law 50/1997 of 27 November, it is stressed that this Royal Decree, in terms of its form and content, has no gender impact whatsoever and certainly contains no provisions that could favour situations of gender-based discrimination. From this point of view the impact is non-existent because it deals exclusively with technical issues and does not have direct legal effects on natural persons.

6.8 Impact on children and adolescents

Pursuant to the provisions of Article 22(5) of Organic Law 1/1996 of 15 January on the Legal Protection of Minors, the partial amendment of the Civil Code and the Civil Procedure Act, as amended by Law 26/2015 of 28 July amending the system for the protection of children and adolescents, the draft legislation has no impact on children and adolescents, since it addresses technical issues and does not have direct legal effects on natural persons.

6.9 Impact on the family

In accordance with the provisions of the tenth additional provision of Law 40/2003, of 18 November, on the protection of large families, introduced by the fifth final provision of Law 26/2015, of 28 July, amending the protection system for children and adolescents, the draft legislation has no impact on

the family, mainly addressing technical issues on products and facilities and having no direct legal effects on natural persons.

6.10 Impact on climate change and energy transition

The fifth final provision of Law 7/2021, of 20 May, on climate change and energy transition, has introduced this impact and amended Article 26.3 of Law 50/1997, of 27 November, of the Government.

In this regard, it is noted that the proposed Royal Decree does not include any relevant changes in this matter compared to the legislation in force previously. The Royal Decree projected has an non-existent impact on climate change and the energy transition.

7. EX-POST EVALUATION

There is no requirement for ex post evaluation of the effectiveness, sustainability and results of the standard, within the meaning of Article 3.2 of Royal Decree 286/2017, of 24 March, regulating the Regulatory Annual Plan and the Regulatory Annual Evaluation Report of the General State Administration and establishing the Regulatory Planning and Evaluation Board.

MAIN ANNEXES

ANNEX I

PRIOR PUBLIC CONSULTATION

The replies received to the public consultation are summarised below:

No	*PERSON/BODY*	*CONTENT*
1	Particular	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one.
2	Particular	Among the different alternatives, it is deemed that the most appropriate option would be to update the current 2004 Regulation (partial amendment of the regulation).
3	FACEL	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one.
4	IPUR	Includes comments on specific sections of Annexes I and II of the 2004 Regulation (intrinsic risk level, products and materials) and performance design.
5	Particular	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation, or that the current one be amended. Includes comments on inspections and supervisory bodies.
6	Particular	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one.
7	Particular	Among the various alternatives, it is deemed that the most appropriate option is the partial amendment of the current regulation of 2004.
8	Particular	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one.
9	Particular	Among the various alternatives, it is deemed that the most appropriate option is the partial amendment of the current regulation of 2004. It also includes comments relating to Scope, Periodic Inspections, Fire Areas, Intrinsic Risk Level, Equipment and Systems and on the experience of other Administrations.
10	Particular	Among the various alternatives, it is deemed that the most appropriate option is the partial amendment of the current regulation of 2004. It also includes certain comments on specific aspects of the 2004 regulation (references to RIPCI, calorific value table of different substances, location and means of protection of establishments located near forest masses, Water Supply Systems).

No	PERSON/BODY	CONTENT
11	COGITI Valencia	Includes comments on specific sections of Annex III (Automatic detection systems, Fire-hydrants systems).
12	Particular	Includes comments with the aim of drafting a new regulation that repeals and replaces the previous one.
13	CNI Installers	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one.
14	CETIVG	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one.
15	APPUNLE	Among the various alternatives, it is deemed that the most appropriate option is the partial amendment of the current regulation of 2004. It also includes comments on logistics platforms, compliance through performance means, evacuation distances, surfaces, fire loading, boundary with adjacent buildings, non-European standards, smoke evacuation, shelving, rehabilitation and reuse of old buildings, etc.
16	Valencian Community	It is deemed appropriate to draft a new Regulation. It also includes comments on the application of equivalent safety techniques, definitions, accident investigation, Annex I (typologies, tables), Annex II (sectorisation, materials, bearing elements and enclosure, evacuation, forest risk), Annex III (common means, hydrants, extinguishers).
17	Particular	Includes comments on the subject-matter of the regulation (additional application).
18	CETIT	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one. It also includes comments on examples and criteria.
19	Particular	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one. It also includes comments on the design of the systems (standards, RIPCI and performance design), documentation and Annex II (construction elements).
20	Particular	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one. It also includes comments on various parts of the regulation.
21	Asturias	Includes comments on definitions, warehouses, shared establishments with various activities, old buildings, ports, bulk warehouses, and RIPCI.
22	Particular	Includes comments on fire hydrant resources.
23	Particular	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one.
24	Particular	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one. It also includes comments on equivalent safety techniques, performance methods, third-party conditions, smoke monitoring and mezzanines.

No	PERSON/BODY	CONTENT
25	Particular	Includes comments on the subject matter of the regulation.
26	Particular	Includes comments on storage.
27	CICCP	Among the different alternatives, it is deemed that the most appropriate option is the development of a new regulation that repeals and replaces the previous one, and that in addition, implementation guides are also published.
28	Particular	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one.
29	EBCN	Among the various alternatives, it is deemed that the most appropriate option is the partial amendment of the current regulation of 2004.
30	AFELMA	Includes comments on building materials, façades and roofs.
31	Tecnifuego	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one. It also includes comments on building materials, façades and roofs.
32	COGITI	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one.
33	LUMAES	Includes comments on specific paragraphs of the annexes to the 2004 regulation on evacuation and signalling.
34	Particular	Includes comments on specific paragraphs of the 2004 regulation on the scope of application (warehouses).
35	ADECES	Includes comments on façades, roofs, materials, evacuation and rehabilitations.
36	Consumer Union of the Basque Country	Includes comments on façades, roofs, materials, evacuation and rehabilitations.
37	CEPREVEN	Includes comments on building materials, and also includes other comments on various points of the 2004 regulation.
38	Particular	Includes comments on building materials, façades and roofs.
39	Particular	It includes comments on the 2004 regulation on wind and photovoltaic facilities, LNG storage, LPG, chemicals and petroleum products, and fuel gas distribution.
40	APICI	Among the different alternatives, it is deemed that the most appropriate option is the elaboration of a new regulation that repeals and replaces the previous one. It includes comments related to logistics activity, façades, roofs, materials, supply methods, third-party condition, smoke control and mezzanine.
41	Catalonia Consumer Union	Includes comments on façades, roofs, materials, evacuation and rehabilitations.

No	PERSON/BODY	CONTENT
42	Particular	Includes comments concerning the scope of application (warehouses).
43	Galicia Con-sumer Union	Includes comments on façades, roofs, materials, evacuation and rehabilitations.
44	Particular	Includes comments on sealing holes and the classification of fire.

ANNEX II

HEARING AND PUBLIC INFORMATION

The following table contains a summary list of the submissions received during the hearing process and public information, including the section of the RD to which they refer, the entity (or individual) issuing them, and the corresponding assessment. The following letter codes are used to perform the valuation: ***A (Accepted), PA (Partially Accepted), R (Rejected), C (Comment without specific proposals).***

For ease of reading and follow-up, in the table the submissions are placed into the following order: First, submissions concerning the wording of the RD and the RSCIEI, and in the final part, submissions regarding the amendments made to the other regulations (final provisions relating to the RIPCI, CTE DB-SI, etc.). In the case of submissions sent several times by several people with repeated content on the same subject, these are shown only once in the table (usually they are associated with the person who sent them chronologically in the first place), being the assessment included in the table applicable to all of them.

On the other hand, it is recalled that the references to numbers of articles, paragraphs or tables that appear here correspond to the order contained in the draft Royal Decree at the time of the hearing, which has subsequently been able to change in its later versions, as a result of the alterations made during the processing.

No	*PERSON/BODY*	*SECTION OF THE RD*	*COMMENTS*	*EVALUATION (A/PA/R/C)*
1	Eurisko Consulting	Single article. Approval the Rules of Procedure	It is proposed not to approve the new regulation, and to adapt the existing one to the current needs and constructive solutions and, at the same time, align it with the rest of the products, facilities and building regulations. The submission of reasons for the new regulation does not reveal that the reason for its publication is that buildings under RSCIEI 2004 are not safe. However, the new regulation represents a significant alteration in the characterisation of industrial establishments that could mean that many of the establishments built in recent years (mainly logistical ones) cannot continue their activities in the current warehouses if there are changes that require the application of the new regulation.	R. Given the proposed changes in structure and content, it is deemed preferable to adopt a new regulation, replacing the previous one in 2004. For establishments built beforehand, they should not be retroactively adapted a priori to the new regulation (the new text, as in 2004, includes provisions covering each case). On the other hand, as is normal, the new regulation proposes amendments to the previous one, but this does not mean that it reduces its safety.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			On the other hand, some of the amendments included in the new regulation mean a significant reduction in the level of safety in the event of fire, allowing for larger sector sizes and extended evacuation routes without compensatory measures, which might pose a risk to people, property protection and the environment.	
2	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	First additional provision of the Royal Decree, paragraph 2: '2. The provisions of Article 12(1), (2) and (3) relating to operation and maintenance; chapter IV 'inspections'; chapter V, 'Action in the event of fire' and Chapter VI, 'penalty regime'; these shall apply from the entry into force of the Regulation to all industrial establishments, regardless of whether they are new or existing prior to it.'	Add the obligation to also comply with Article 12(4) (amendments) of Chapter III of the RSCIEI. This amendment should be in line with the amendment to paragraph 4 of the first additional provision, and the amendment to Article 10 proposed below. Replace with: '2.The provisions of Article 12 "Operation, maintenance and alterations"; chapter IV 'inspections'; chapter V, 'Action in the event of fire' and Chapter VI, 'penalty regime'; these shall apply from the entry into force of the Regulation to all industrial establishments, regardless of whether they are new or existing prior to it.'	R. The definition of the concept of 'alterations' and the section that addresses them are intended to apply to establishments that comply with the new regulation, since for previously existing establishments other cases are defined, since the requirements they meet are different.
3	particular	First additional provision '(a) Industrial establishments that were built in accordance with Royal Decree 2267/2004 of 3 December approving the Regulation on fire safety in industrial establishments, which already provided for the existence of periodic inspections, must adapt the content and periodicity of these inspections to the requirements of Article 13 of these regulations.'	They should clarify what is deemed 'industrial establishment' since it mentions 'construction', the fact that a particular company carries out the activity in a building built for example in 1985 and now sells it to another company with the same or different activity in 2022 implies that it becomes another 'industrial establishment' and that it must adapt the building or other elements of the building to the current regulations, right?	R. The concept of industrial establishment is defined in Article 3 and the cases in which it must be adapted are set out in the D.R.1 and the articles. The text is appropriate and does not require any changes or clarifications.
4	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	First additional provision of the Royal Decree, paragraph 3 (c): '(c) Except for periodic inspections referred to in points (a) and (b) of industrial establishments whose fire load density, calculated in accordance with Annex I, does not exceed 42 MJ/m^2, provided that their constructed surface area is not more	Replace 'the fire load density of which' with 'in which the sum of the weighted and corrected fire load density of its fire sectors and areas'	A. The has been amended to speak of 'weighted and corrected fire load'.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		than 120 m ^{2} and that they comply with Article 5(2) of the Regulation.'		
5	CEPREVEN	First additional provision, paragraph 3, (a) and (b).	It is not envisaged that there might be industrial establishments where, taking into account the dates of construction and the application of the single transitional provision of the previous Royal Decree 2267/2004 of 3 December, in the same establishment, a part falling within the scope of the RSCIEI may coexist and another excluded from it. Therefore, the question remains as to whether the part included will be subject to inspections by the RSCIEI and excluding those of the RIPCI or whether another interpretation is possible.	R. It is understood that this situation already occurs with the 2004 RSCIEI, and that it is already clear from the current wording.
6	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	First additional provision. Enforcement regime of the Fire Safety Regulation in industrial establishments to existing industrial establishments prior to its entry into force (c) except for periodic inspections referred to in points (a) and (b) above, industrial establishments the fire load density of which, calculated in accordance with Annex I, does not exceed 42 MJ/m², provided that their constructed surface area is less than or equal to 120 m² and complying with the requirements of Article 5(2) of the Regulation.	The meaning of the provisions of this section (c) is not understood, based on the following question *When, how and who determines that an establishment prior to RD2267/2004 and the constructed area of which is ≤ 120m² meets the requirements laid down in that section, in order to be excluded from carrying out periodic inspections?* It is proposed to establish time limits for any industrial establishment that has been authorised without obligation to comply with RD2267/2004, to undergo the assessment of its fire load density and NRI built area, in order to determine its actual situation. This assessment will be reflected in a Technical Report or Technical Report drawn up by a qualified expert person, which will contain, on the basis of the results of the assessment, the regulatory inspection requirements to which the establishment must comply with the provisions of the new CESR. This report or report must be registered with the competent official body, in accordance with the procedures laid down for that purpose. JUSTIFICATION With the proposal any industrial establishment prior to RD2267/2004 would be obliged to carry out the assessment of its situation in relation to fire safety, and in this way would significantly improve the knowledge of the current situation in this regard and favour the implementation of	R. It is understood that the proposed text is sufficiently clear. The limits in this paragraph are consistent with the limits that appear elsewhere in the text.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			fire-protection measures after regulatory inspections that following the evaluation reports were determined necessary.	
7	Superior Council of the Colleges of Architects of Spain	First additional provision of the RSCIEI project, paragraph 3(b), in the following text: '3.b) Industrial establishments which were built prior to Royal Decree 2267/2004 of 3 December will carry out at least the periodic inspections referred to in Article 22 of the Fire Protection Facility Regulation.'	*When referring to the fire-protection facility regulation, specify the specific regulations: 'Royal Decree 513/2017 of 22 May adopting the Regulation on fire protection facilities.'*	A. The text is been changed.
8	Service for Preventing and Extinguishing Fires and Rescue of the City of Vitoria-Gasteiz	First additional provision. Point 4. The criterion of the current Royal Decree 2267/2004 is maintained: 'The rest of the requirements of this Regulation will only apply to new industrial establishments that are built or implemented from its entry into force, as well as to those already existing that move or modify their activity. It will also apply to those industrial establishments where there are extensions or reforms involving an increase in their occupied area or an increase in the level of intrinsic risk...'	PROPOSAL: In any amendment to licences or work applications in which this regulation would not apply, require at least conditions of external Evacuation and spreading in the sector concerned, essential requirements for the safety of workers and neighbouring establishments.	R. The proposed text already sets out in which cases an establishment should be adapted to the new requirements.
9	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	First additional provision of the Royal Decree, paragraph 4: '4. The remainder of the requirements of this Regulation will apply only to new industrial establishments that are built or established from its entry into force, as well as to existing establishments that move or modify their activity. This will also apply to those industrial establishments in which there are ex-	Paragraph 4 of the first additional Provision of the Royal Decree may be removed in line with the amendment of paragraph 2 of the First Additional Provision and the amendment of Articles 10 and 12 proposed in this document.	PA. The text was restructured to make it clearer. In any event, it is important that all cases relating to existing establishments be reflected. The cases of the 'alterations' of establishments that comply with the new regulation are detailed in their respective article, but it is not applicable to previous establishments because they complied with other legislation and therefore it is important to explicitly consider their specific case.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		tensions or renovations that involve an increase in their occupied area or an increase in the level of intrinsic risk. In these cases, these requirements only apply to the part affected by the enlargement or reform, which is generally considered to be the sector or fire area concerned. However, the competent body of the relevant Autonomous Community or of the cities of Ceuta and Melilla may require, if it deems appropriate, the application of the regulation to other sectors and areas of fire, or even to the industrial establishment in its entirety.'		
10	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	First additional provision. Section 4. '... or an increase in the level of intrinsic risk.'	Add: *... or an increase in intrinsic risk level* **according to the 8 levels set out in Table 1.1 of Annex I.**	A. The proposal was added and the text was restructured.
11	CEPREVEN	First additional provision, section 4. 4. The remainder of the requirements of this Regulation will apply only to new industrial establishments that are built or established from its entry into force, as well as to existing establishments that move or modify their activity.	It is not defined what is meant by alteration of the activity, which gives rise to many different interpretations. It is understood, in any event, that this is a different concept from that of alteration of the establishment defined in Article 12(4) of the Regulation. It is suggested that the following be added to the paragraph: *or alter their main activity in accordance with the current National Classification of Economic Activities [CNEA].*	PA. The text has been restructured so that it is better understood. However, citing the CNAE is not considered appropriate.
12	CEPREVEN	First additional provision, section 4. This will also apply to those industrial establishments in which there are extensions or renovations that involve an increase in their occupied area or an increase in the level of intrinsic risk. In these cases, these requirements only apply to the part affected	It is not specified whether the increase in the level of intrinsic risk is to be understood in terms of classification or subclassification, as distinguished in section 3.1 of Annex I. In addition, it is suggested that the paragraph be amended as follows: *It will also apply to those industrial establishments in which there are extensions or renovations that involve an increase in its occupied area* ***by a production or storage activity, re-***	PA. The text has been restructured so that it is better understood.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		by the enlargement or reform, which is generally considered to be the sector or fire area concerned. However, the competent body of the relevant Autonomous Community or of the cities of Ceuta and Melilla may require, if it deems appropriate, the application of the regulation to other sectors and areas of fire, or even to the industrial establishment in its entirety.	***gardless of whether this area was already built*** *or an increase in the level of intrinsic risk* ***of any of its sectors or fire areas****. […]*	
13	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	First additional provision. Point 4	Where it says: 'However, the competent body of the corresponding Autonomous Community or the cities of Ceuta and Melilla may require, **if it deems appropriate**, the application of the regulation to other sectors and areas of fire, or even to the industrial establishment in its entirety', include 'if it is detected that the safety requirements of this regulation may be compromised'. **Reason**: limit the phrase 'if deemed appropriate' to the scope of this Regulation, fire safety.	A. The phrase is changed to a more detailed one.
14	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	First additional provision. Point 4.	Where it says: 'It will also apply to those industrial establishments where there are extensions or renovations involving an increase in their occupied area or an increase in the level of intrinsic risk. In these cases, these requirements only apply to the part affected by the enlargement or reform, which is generally considered to be the sector or fire area concerned. However, the competent body of the relevant Autonomous Community or of the cities of Ceuta and Melilla may require, if it deems appropriate, the application of the regulation to other sectors and areas of fire, or even to the industrial establishment in its entirety.', Replace with 'It will also apply to those industrial establishments where there are extensions or reforms involving a significant increase in their occupied area, by at least 20 %, or an increase in the level of intrinsic risk. In such cases, these requirements will apply only to the part affected by	PA. The text is restructured so that it is better understood, and the cases are clearer. However, no criteria for area increase by percentages are introduced because it is deemed inappropriate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			the enlargement or reform, which is generally considered to be the sector or fire area concerned.'; Reason: There are insignificant increases in occupancy that, provided that the level of intrinsic risk does not increase, do not entail an alteration in the existing conditions of the industrial establishment that justify the application of the new legal regime. On the other hand, leaving to the decision of the Autonomous Communities and Cities the application of the Regulation 'if they consider it appropriate', denotes a wide margin of discretion and possible inequality between the subjects concerned. The text of the Regulation allows the Autonomous Communities or Cities to require discretionary application to areas not affected by the extensions or increase of the level of risk in existing buildings. However, we consider that the Regulation does not apply to the areas of the building which are not affected by alterations. In the event of this provision being maintained, it should not be included in the basic state legislation, but rather established in the regional legislation with the relation of the cases in which the application of the state or regional regulations on fire protection in industrial establishments may be required. Eliminating, in this way, possible arbitrary actions by the Administration, providing safety to legal traffic and generating legitimate expectations to those administered with respect to the requirements that will be required of them in each case of fact.	
15	EXOLUM	First additional provision, point 4, paragraph 2. This will also apply to those industrial establishments in which there are extensions or renovations that involve an increase in their occupied area or an increase in the level of intrinsic risk. In these cases, these requirements only apply to the part affected by the enlargement or reform, which is generally	Add the following paragraph: *In the event that the extension is covered by a sector-specific regulation such as storage of chemicals or oil facilities, this regulation shall not apply to it, with the requirements of the aforementioned regulations prevailing.*	R. In cases where other specific legislation covering fire safety requirements applies, the regulation does not apply. There is no need to change the wording.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		considered to be the sector or fire area concerned. However, the competent body of the relevant Autonomous Community or of the cities of Ceuta and Melilla may require, if it deems appropriate, the application of the regulation to other sectors and areas of fire, or even to the industrial establishment in its entirety.		
16	General Secretariat for Industry and Mines, Government of Andalucía	First additional provision, and in particular section 4, in connection with Article 2 of the RSCIEI (Scope).	We deem it appropriate to consider whether part of the text of this provision should be moved to Article 2 and vice versa, since both provisions address the scope of the RSCIEI and the treatment of existing buildings. In any event, in order to facilitate the understanding of the text and to ensure its consistency, we consider it appropriate to deal jointly with the wording of the two provisions. In this sense, the first part of paragraph 4 of the D.A.1, which refers to the application of the RSCIEI to the **'new'** industrial establishments, seems to be in Article 2 of the RSCIEI or reflected therein. Also, it would seem to be better to place Article 2(2) of the RSCIEI in the D.A.1ª, since it is still an additional situation to those referred to in that provision in which the RSCIEI would apply to existing establishments.	PA. The text has been restructured to be clearer and more orderly.
17	particular	First additional provision. Section 4. Paragraph 2.	With this wording, in renovations interventions, or even enlargement, that are carried out in existing establishments, in which there is NO increase in the occupied area or the level of intrinsic risk, no technical requirements of the new regulation need to be applied. Which is not entirely right. I propose adding a principle similar to that which governs in the DB SI for reform works without change of use, that is, the technical requirements apply only to the elements modified by the reform, while respecting no prejudice to pre-existing conditions, where they are less strict than those provided for in the new regulation. If this is not done, in renovation works, which are also frequent in industry, in which the case of adaptation does not occur, there would be no regulation and could even use ma-	A. A new paragraph has been added reflecting this casuistry.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			terials and systems with clearly inadequate performance for the purpose of safety pursued by the regulation.	
18	particular	First additional provision. Section 4. Paragraph 2.	The principle that, in the event of an increase in area, the technical requirements should be applied to the entire sector concerned – which were present in the current RSCIEI – has in most cases entailed having to sector any extension in existing establishments, even though this was clearly contrary to the operational interests of the establishment. That has occurred, even in low-risk sectors. The reason was that is was not possible to adapt an entire sector to the requirements of the new regulation. Let us consider, for example, how materials react to fire. On many occasions, it has been a measure disproportionate and contrary to the interests of development or survival of establishments. Perhaps some formula could be added that, under certain circumstances, would allow the increase of surface area without the need to adapt the whole sector to all the technical requirements of the new regulation.	R. The text defines in which cases an establishment should be adapted, and offers different ways to facilitate adaptation in the case of existing buildings. A more lax text might pose a risk. (Note that it was possible to restructure part of the text of this provision or move it to other parts of the article, following the review of the rest of the submissions.)
19	KREAN S.COOP	DA1. *Point 4.* The rest of the requirements of this Regulation shall apply only to new industrial establishments which are constructed or established as from its entry into force, as well as to existing establishments that move or modify their activity.'	Does a change in ownership entail a change in your activity? What happens to industrial activities that change ownership and are engaged in exactly the same activity (name change, but involving an activity file)? Would the regulation be applicable? In these cases, how would the burden be recalculated? With the new regulation, or with which it was in force when the intrinsic risk of the industrial unit changing ownership was calculated?	A. Clarification has been added to the text on this subject (in the articles).
20	KREAN S.COOP	DA1. Point 4. Paragraph two. This will also apply to those industrial establishments in which there are extensions or renovations that involve an increase in their occupied area or an increase in the level of intrinsic risk**.** In these cases, these requirements only apply to the part affected by the enlargement or reform, which is generally considered to be the sector or	Does this application of the regulation necessarily involve the creation of an independent fire sector? (In this way, separating the existing activity from the modified one in a form physical). Is it mandatory if an amendment is made in an area that does not affect an entire sector to apply compliance with the regulation to the entire area? For example: Existing industrial unit from 1969 with an area of 1,000m², expands its area 100m², we cannot sectorise, implementation of a large press. In this case I would have to comply with the regula-	R. The current wording of the text is sufficiently clear, and in cases where sectorisation is required, it explicitly states so.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		fire area concerned. However, the competent body of the relevant Autonomous Community or of the cities of Ceuta and Melilla may require, if it deems appropriate, the application of the regulation to other sectors and areas of fire, or even to the industrial establishment in its entirety.	tion in the 1,000m² of the initial sector? Clarify, since it is not clear either in this regulation or in the previous one.	
21	Superior Council of the Colleges of Architects of Spain	First additional provision of the RSCIEI project, section 4, in the following text: '4. The other requirements of this Regulation shall apply only to new industrial establishments which are constructed or established as from its entry into force, and to existing establishments which move or modify their activity.'	When referring to the alteration of activity, add what happens to the same activity where a change of ownership takes place.	A. Clarification has been added to the text on this subject (in the articles).
22	FEDAOC	First additional provision, point 5 'Regarding section 4 above, when the establishment, extension or reform of an industrial establishment is carried out in industrial estate buildings with urban planning approved before the entry into force of this regulation, or in an existing building in which the characteristics of the building cannot comply with Article 5.1(a), the route referred to in Article 5(1)(b) must be used). In such a case, if the requirements of Article 5(1)(b) cannot be met in their entirety, the operator of the establishment may exceptionally make use of reasonable adaptations which differ from that indicated therein, provided that it justifies its necessity and that the basic requirements of Article 6.1 are met. These adaptations shall be doc-	Point 5.1.b refers to equivalent safety techniques; 5.1a cites compliance with the requirements of the regulation in their entirety. This can greatly complicate extensions or alterations to existing establishments; in particular, there are numerous type B industrial units according to RD 226/2004 that would no longer meet the conditions for type B with the new regulations, becoming type A industrial units. To impose the change of typology or alternative/performance-based technical solutions hinders and de facto makes these alterations or extensions more expensive. Suggestion: include the following: (...) in an existing building in which its characteristics cannot comply with Article 5(1)(a), <u>with the exception of point 1 of Annex I</u>, the route referred to in Article 5(1)(b) shall be used.	PA. The text is reordered and the paragraph is amended to make the intended meaning, and the possible means of compliance, clearer. Nevertheless, compliance with specific points in the annexes is not excluded.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		umented and submitted together with the project, following a report from a supervisory body, as referred to in Articles 10(3) and 11. After the submission of the documentation, the competent body of the relevant Autonomous Community or of the cities of Ceuta and Melilla may, if it deems appropriate, require additional justifications that it deems necessary, and if it considers them insufficient or considers the level of security of the establishment to be deficient, it may require the application of additional measures as appropriate.'		
23	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	First additional provision. Enforcement regime of the Fire Safety Regulation in industrial establishments to existing industrial establishments prior to its entry into force. POINT 5	It is suggested to replace the paragraph 'After the submission of the documentation, the competent body of the relevant Autonomous Community or the cities of Ceuta and Melilla may, if it deems appropriate, require additional justifications that it deems necessary, and if it considers them insufficient or considers that the level of security of the establishment is deficient, the competent body of the relevant Autonomous Community or of the cities of Ceuta and Melilla may require the application of the appropriate additional measures' where, through the corresponding inspection of the documentation submitted or of the in-situ establishment, insufficient justification for the regulatory compliance is detected, the competent body of the relevant Autonomous Community or the cities of Ceuta and Melilla may require the necessary additional justifications to be deemed insufficient in the case of the necessary cessation of the necessary or the necessary cessation of the activity is deemed to be necessary by the competent body of the Autonomous Community or the cities of Ceuta and Melilla. "	A. The has been amended to make it clearer.
24	CEPREVEN	First additional provision, section 5. 5. With regard to section 4 above, when the establishment, extension	It is not explicitly stated that, in this case, an express positive authorisation by the competent body is necessary. If that is the intention of the legislator, it is recommended to	R. The current wording is sufficiently clear, and does not state that explicit authorisation is required.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		or renovation of an industrial establishment is carried out in buildings of industrial estates with urban planning approved before the entry into force of this regulation, or in an existing building in which its characteristics cannot comply with the provisions of Article 5(1)(a), the route referred to in Article 5(1)(b) must be used. In such a case, if the requirements of Article 5(1)(b) cannot be met in their entirety, the operator of the establishment may exceptionally make use of reasonable adaptations which differ from that indicated therein, provided that it justifies its necessity and that the basic requirements of Article 6.1 are met. These adaptations shall be documented and submitted together with the project, following a report from a supervisory body, as referred to in Articles 10(3) and 11. After the submission of the documentation, the competent body of the relevant Autonomous Community or of the cities of Ceuta and Melilla may, if it deems appropriate, require additional justifications that it deems necessary, and if it considers them insufficient or considers that the level of security of the establishment is deficient, it may require the application of additional measures as appropriate.	add at the end of paragraph ***for the appropriate authorisation of exception of that competent body***.	
25	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF	First additional provision. Point 5	Where it says: 'As regards paragraph 4 above, when the establishment, extension or reform of an industrial establishment is carried out in industrial estates with urban planning approved before the entry into force of this regulation', in-	A. Drafting has been improved.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)		clude: 'As regards paragraph 4 above, when the establishment, extension or reform of an industrial establishment is carried out in buildings **already built** of industrial estates with urban planning approved before the entry into force of this regulation. **Reason**: with the current wording, a new establishment built in an old planning polygon can benefit from this exceptional route.	
26	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	First additional provision. Point 5.	Where it says: '5. With regard to section 4 above, when the establishment, extension or renovation of an industrial establishment is carried out in buildings of industrial estates with urban planning approved before the entry into force of this regulation, or in an existing building in which its characteristics cannot comply with the provisions of Article 5(1)(a), the route referred to in Article 5(1)(b) must be used. In such a case, if the requirements of Article 5(1)(b) cannot be met in their entirety, the operator of the establishment may exceptionally make use of reasonable adaptations which differ from that indicated therein, provided that it justifies its necessity and that the basic requirements of Article 6.1 are met. These adaptations shall be documented and submitted together with the project, following a report from a supervisory body, as referred to in Articles 10(3) and 11. Following the submission of the documentation, the competent body of the relevant Autonomous Community or of the cities of Ceuta and Melilla may, if it deems appropriate, require additional justifications that it deems necessary, and if it considers them insufficient or considers that the level of security of the establishment is deficient, it may require the application of additional measures as appropriate'; Delete: ''~~After the submission of the documentation, the competent body of the corresponding Autonomous Community or the cities of Ceuta and Melilla may require, if appropriate, any additional justifications that it deems necessary, and in the case of considering them insufficient or considering that the security level of the establishment is defi-~~	PA. The wording of the paragraph was changed to make it more precise.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			~~cient, it may require the application of the additional measures that are appropriate."~~ **Reason**: allowing the Autonomous Communities and Cities to 'require, if appropriate, additional justifications that they deem necessary' gives them a wide margin of discretion. Discretion that may create inequality between the interested parties in the same Autonomous Community and, in any case, between different Communities where different criteria are applied in the same case of fact. In the event of this provision being maintained, it should not be included in the basic state legislation, but rather established in the regional legislation with the relation of the cases in which the application of the state or regional regulations on fire protection in industrial establishments may be required. Eliminating, in this way, an arbitrary action by the Administration, providing safety to legal traffic and generating legitimate expectations to those administered about the requirements that will be required of them in each case of fact.	
27	General Secretariat for Industry and Mines, Government of Andalucía	First Additional Provision, section 5	This section also refers to newly set-up establishments, which are not the subject of this D.A.1ª, so we understand that they should be deleted from this paragraph and introduce a similar paragraph in Article 5 of the RSCIEI for newly set-up establishments.	R. The text was restructured.
28	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	New additional provision of the Royal Decree	It is proposed to add a third additional provision to avoid duplication of checks on industrial activities in relation to those provided for in the administrative intervention of the Administration of the Government of Catalonia in Law 3/2010 of 18 February on fire prevention and safety in establishments, activities, infrastructure and buildings. 'Third additional provision The certificate of initial verification or monitoring issued by the regional administration, or, where appropriate, by supervisory bodies authorised by it, by virtue of its powers in the field of fire prevention and safety, may replace the initial inspection report referred to in Article 11(1)(c) of this Regu-	R. After studying it together with the issuer of the submission and considering different alternatives, it is concluded that it is not necessary to add the proposed text to the Royal Decree.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			lation.'	
29	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	New additional provision of the Royal Decree	It is proposed to add a fourth additional provision making it possible to establish specific conditions for technical and professional training of the staff of the supervisory bodies and also incorporate the content of the final paragraph of Article 13(2), with amendments: 'Fourth additional provision The Director-General for Industry and SMEs may, by resolution, lay down specific technical and vocational training conditions for the staff of the supervisory bodies responsible for carrying out conformity assessment tasks in accordance with this Regulation. The Director-General for Industry and SMEs may, by resolution, draw up instructions for the supervisory bodies where the checks to be carried out in order to issue third party reports, initial inspection reports and carry out inspections are carried out in greater detail.'	R. It is understood that with the current wording, the requirements are already set.
30	particular	In the *first transitional Provision. Enforcement regime for industrial establishments under construction at the time of entry into force of this Royal Decree*, mentions '*projects that have requested the activity permit*'	Currently, the legislation allows administrative authorisations to be requested similar to those carried out by the procedure of permit of activity by other procedures such as the Statement of Compliance. Failure to mention this may lead to distinctions by experts from the competent administrations. In Article 10 of the RSCIEI if they make such a precision indicating the following *'...obtaining the required licenses and authorisations...'*	PA. The wording of the text was changed to make this matter clearer, although no reference was made to responsible declarations.
31	IETcc	First transitional provision. Enforcement regime for industrial establishments linked to a building process.	The following drafting change is proposed in the event that concerns a process of building an industrial establishment. This type of transitional provisions are common in the approving new documents of the CTE and their amendments, and it has been verified that they are necessary to adapt to the process of drafting a building project and to limit the period between the granting of a permit and the start of the works avoiding abuse at the beginning of these works. First transitional provision. Enforcement regime for industrial establishments linked to a building process. *This Regulation shall not apply to industrial establishments that are the subject of a construction work, nor to extension,*	PA. The text has been amended. With regard to the transitional deadlines, it should be noted that these must be coordinated together with the date of entry into force of the RD that is put in place. Depending on the date set for entry into force, transitional deadlines will be fixed.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			alterations or renovations or refurbishment upon the entry into force of this Royal Decree, provided that they complete their construction and are commissioned within four years from the entry into force of this Royal Decree. Nor shall the regulations apply to industrial establishments the works of which involving new construction, extension, alteration or refurbishment concerning applying for the municipal permit of works at the time of the entry into force of this Royal Decree or request it within six months of the entry into force of this Royal Decree. These works must begin within the maximum period of effectiveness of said permit, in accordance with its regulatory regulations, and, failing that, within nine months from the date of the granting of the said permit and industrial establishments must complete their construction and be commissioned within four years from the entry into force of this Royal Decree, applying in that case Royal Decree 2267/2004, of 3 December, approving the Regulation on safety in the event of fires in industrial establishments. Otherwise, projects must be aligned with this Regulation. This regulation shall apply to industrial establishments that are the subject of a construction work, extension, alteration or renovation for which municipal permit of works is requested after the period of six months from the entry into force of this Royal Decree.	
32	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	First transitional provision. Enforcement regime for industrial establishments under construction at the time of entry into force of this Royal Decree	At the end, add: However, the projects and facilities mentioned above may be fully adapted to this regulation.	R. The current text is correct and clear enough. No changes are necessary.
33	CEPREVEN	First transitional provision. This Regulation shall not apply to industrial establishments under construction at the time of its entry into force, nor to projects that have applied for an activity permit with an application date prior to the entry into force of this Royal Decree, nor to	It is suggested that the paragraph should be worded as follows: *This regulation shall not apply to industrial establishments in the process of construction at the time of its entry into force, nor to projects that have applied for an activity permit,* ***permit of works or submitted a declaration responsible for the execution of the works, where appropriate,*** *with an application date prior to the entry into force of this Royal Decree,*	PA. The wording of the text was changed to make this matter clearer, although no reference was made to responsible declarations.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		projects already approved by the public administrations on the date of entry into force of the Royal Decree, provided that they complete their construction and are commissioned within four years from the entry into force of this Royal Decree; applying in this case Royal Decree 2267/2004 of 3 December, approving the Regulation on fire safety in industrial establishments, as well as the provisions of the first additional provision of this Regulation.	*nor to projects already approved by the public administrations on the date of entry into force of the Royal Decree, provided that they complete their construction and are commissioned before four years from the entry into force of this Royal Decree; applying in this case Royal Decree 2267/2004 of 3 December, approving the Regulation on fire safety in industrial establishments, as well as the provisions of the first additional provision of this Regulation.*	
34	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	First transitional provision. Enforcement regime for industrial establishments under construction at the time of entry into force of this Royal Decree This Regulation shall not apply to industrial establishments under construction at the time of its entry into force, nor to projects that have applied for an activity permit with an application date prior to the entry into force of this Royal Decree, nor to projects already approved by the public administrations on the date of entry into force of the Royal Decree, provided that they complete their construction and are commissioned within four years from the entry into force of this Royal Decree; applying in this case Royal Decree 2267/2004 of 3 December, approving the Regulation on fire safety in industrial es-	First transitional provision. Enforcement regime for industrial establishments under construction at the time of entry into force of this Royal Decree This Regulation shall not apply to industrial establishments in the process of construction at the time of its entry into force, nor to projects that have applied for an activity permit with an application date prior to the entry into force of this Royal Decree, nor to projects already approved by the public administrations on the date of entry into force of the Royal Decree, nor to projects that were approved by the corresponding professional college prior to the entry into force of this Royal Decree, provided that they complete their construction and are commissioned within four years from the entry into force of this Royal Decree; applying in this case Royal Decree 2267/2004 of 3 December, approving the Regulation on fire safety in industrial establishments, as well as the provisions of the first additional provision of this Regulation. JUSTIFICATION: Our corporation considers that the public service of collegial visas should be taken into consideration in this transitional provision, as an instrument of administrative verification and technical supervision carried out by a professional association such as Corporation of Public Law	PA. The wording of the text was changed to make this matter clearer, although no reference was made to visas.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		tablishments, as well as the provisions of the first additional provision of this Regulation.	which, among many other aspects, accredits the identity, competence and empowerment of who signs the technical project, as well as the accreditation of the date of that collegial control. All of this and also in accordance with the wording of the Ministry of Industry, Trade and Tourism itself, referring to the Draft Royal Decree approving a new TTI BT-53 of the REBT and amending the Regulation and other ITCs of the same, as well as the ITC RAT-09 of the Regulation on technical conditions and guarantees of safety in high voltage electrical facilities; 'in the event the installation requires a project and it is approved by a professional association, or the installation is integrated into a project requiring a visa, the visa date shall be taken'. Obviously, for those facilities for which a project is not required, it may also be that of a visa, if that exists without the requirement yet being perceived, since it would mean equal demonstrative status, of the date of planning of the installation, with respect to another one if it required a project.'	
35	Superior Council of the Colleges of Architects of Spain	First transitional provision. *Enforcement regime for industrial establishments under construction at the time of entry into force of this Royal Decree* 'This regulation shall not apply to industrial establishments in the process of construction at the time of its entry into force, nor to *projects that have applied for the activity permit* with an application date prior to the entry into force of this Royal Decree, *or to projects already approved* by the public administrations...'	To stipulate the mandatory application of the new RD, the regulatory text should take into particular consideration the **application for permit or administrative authorisation corresponding to the works projects** of such buildings or industrial establishments. It is usual that in the construction project, the building/establishment is already provided with all the conditions of passive and active protection relevant to carry out the activity. With the current system of communicating activities, in the process with the administration, only the characteristics of the establishment and the activity are described, noting that the benefits available are already necessary. Therefore, it is proposed to include the works projects, in such a way that the text is '*the projects that have requested the activity permit or work*' Currently, in Catalonia, with *Law 18/2020 on the facilitation of economic activity*, communicating the activity is generally the last procedure for the commissioning of the activity	PA. The wording of the text was changed to make this matter clearer, although no reference was made to visas.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			once the industry or establishment is fully adequate. The mandatory sectoral authorisations, such as preventive monitoring in the field of safety in the event of fires, or the review corresponding to the mandatory visa procedure, are prior to the notification of the opening of the activity. Therefore, it is necessary that **the RD also contemplates the start date of the administrative authorisation application procedures related to the building process**, in the first transitional provision of the RD. Otherwise, there might be cases in which the owner of the installation has an executive project fully developed and presented to the Administration that, due to the extensive deadlines for current response and approval of the construction projects, must be carried out again with the consequent damages for all the parties involved (owner of the activity, technical editor and City Council). The date of the granting of the administrative authorisation to start the project depends on factors that are not controllable by the project author or the owner of the activity. In the same way, the visa procedure should be considered for those works that require a project according to Law 38/199 *on the Building Regulations*, LOE (Article 2.1 and 2.2) and subject to the mandatory collegial visa. The Royal Decree 1000/2010 *on the compulsory collegial visa* determines, among others, that the visa requirement is for those works that require a construction project in accordance with Article 2.2 of the LOE, justifying the necessity of the same because there is a direct causal link between professional work and the impact on the physical integrity and security of people, considering the compulsory collegial visa the most proportionate means of monitoring. Given the importance of the visa figure, it is necessary that the first final provision also considers projects with visas prior to the entry into force of the RD.	
36	FEDAOC	Second transitional provision. It is indicated: 'as long as there are no supervisory	There are already bodies authorised to evaluate equivalent safety techniques/provisional design.	R. There are currently no such bodies, because the 2004 RSCIEI does not include them. There may currently be en-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		bodies authorised for the activities referred to in Article 10(3), the particular cases where it is chosen to use equivalent safety techniques or performance design shall require prior resolution by the body responsible for the industry of the relevant Autonomous Community, or the cities of Ceuta and Melilla.'	Remove the second transitional provision.	tities accredited by ENAC to perform similar tasks, but that are not qualified as a CB for the 2004 RSCIEI because it does not take these into account. In any event, the transition process is expected to be short.
37	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	Second transitional provision. Enforcement regime for projects of equivalent safety or performance design as long as there are no supervisory bodies in accordance with Article 10(3) of the Regulation	There are already supervisory bodies that issue third-party reports according to what we have indicated in the guide for performance design. I also believe it necessary to clarify whether accreditation for financial design requires that the reporting inspector also have accreditation for RSCIEI.	R. There are currently no such bodies, because the 2004 RSCIEI does not include them. There may currently be entities accredited by ENAC to perform similar tasks, but that are not qualified as a CB for the 2004 RSCIEI because it does not take these into account. In any event, the transition process is expected to be short.
38	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Second transitional provision of the Royal Decree 'Enforcement regime for projects of equivalent security or performance design as long as there are no supervisory bodies in accordance with Article 10(3) of the Regulation'	It is requested to clarify whether this transitional provision will cease to apply at the time when a first supervisory body accredited in accordance with Article 10(3) of the RSCIEI exists in the state.	R. The current text already makes this clear in the title of the provision and in its development: 'as long as there are no bodies...' and 'As long as there are no authorised supervisory bodies...', therefore it is not necessary to detail it further.
39	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Second transitional provision. Enforcement regime for projects of equivalent safety or performance design as long as there are no supervisory bodies in accordance with Article 10(3) of the Regulation As long as there are no supervisory bodies authorised for the activities referred to in Article 10(3), the particular cases where it is chosen to use equivalent safety techniques or performance design will require prior	*Second transitional provision. Enforcement regime for projects of equivalent safety or performance design ~~as long as there are no supervisory bodies in accordance with Article 10(3) of the Regulation~~* It is proposed to change the current text to the following: Projects or measures proposed and based on the use of techniques and solutions shall demonstrate that the equivalent safety corresponding to the parameters on which the minimum requirements and the statutory ceilings are based have been achieved In all cases, they shall be carried out by competent, qualified expert person and will require a prior decision by the competent body in matters of industry of	R. The mechanism proposed in the new text was the mechanism indicated therein. This indicates the route for these cases, and transiently the pathway as long as there are no CBs. The current text is sufficiently correct and clear.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		resolution to be explicitly decided by the competent industry body of the corresponding Autonomous Community or the cities of Ceuta and Melilla. Together with the required documentation, the competent body may require for the assessment of the equivalent level of effectiveness a technical report issued by a qualified and independent body. In view of the submissions presented and the documentation submitted, the competent body may reject the application, request the amendment of the proposed solutions, or grant authorisation.	the corresponding Autonomous Community or the cities of Ceuta and Melilla. In line with the previous text, it is proposed to amend Article 10(3) by deleting the following text: Article 10. Construction projects [...] 3. For particular cases where it is chosen to use equivalent safety techniques or performance design, as referred to in Article 5(1)(b), the project must document the use of these techniques, as well as that the solutions adopted meet the basic requirements of Article 6.1, and that the level of safety obtained is at least equivalent to that obtained by the application of the requirements indicated in this Regulation. ~~Together with the project, an independent third-party report must be attached, which positively validates the effectiveness and adequacy of technical solutions, issued by a supervisory body authorised for these tasks in accordance with Royal Decree 2200/1995 of 28 December approving the Infrastructure Regulation for Quality and Industrial Safety.~~ JUSTIFICATION It is evident, and this is reflected in the text of this provision, that the competent public administration is responsible for the resolution on proposals for financial designs made by the project executors. What does not make sense is to submit the criteria of the project executors to the judgment and approval of third parties, when they can prove their competence in the production designs by complying with the requirements that will be required of the OCA for such judgment, since the fundamental basis of the analysis of supply solutions will be none other than the training and knowledge on them of the persons who carry it out, whether they are part of an OCA or acting as project executors; and the handling of simulation tools and equipment needed both in the design and analysis phase of the design. The intervention of a third party, whatever its nature, for issuing an independent report is no guarantee of adding an improvement to safety, since the professional competence	

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			of the author of the report would not have to be greater, it could even be less than that of the project executor. With regard to independence, it is not acceptable in any case to question that of the project executor, especially when his or her professional performance concerns the safety of people. Therefore, our Corporation believes that the current text will not provide any further guarantee in the design phase. The responsibility will always lie with the project executor and so it must be, the option envisaged only adds more bureaucratic burden and costs to the procedure, and in no way helps safety and industrial quality, nor does it benefit society in general.	
40	KREAN S.COOP	Second transitional provision. Enforcement regime for projects of equivalent safety or performance design *as long as there are no supervisory bodies in accordance with Article 10(3)* of the Regulation As long as there are no supervisory bodies authorised for the activities referred to in Article 10(3), the particular cases where it is chosen to use equivalent safety techniques or performance design will require prior resolution to be explicitly decided by the competent industry body of the corresponding Autonomous Community or the cities of Ceuta and Melilla. Together with the required documentation, the competent body may require for the assessment of the equivalent level of effectiveness a technical report issued by a qualified and independent body. In view of the submissions presented and the documentation submitted, the competent body may reject the application, request the amendment of the pro-	What is set out in the second paragraph is not understood, it indicates that: *Together with the required documentation, the competent body may require for the assessment of the equivalent level of effectiveness a technical report issued by a qualified and independent body*. At the outset, however, it states that as long as there are no supervisory bodies authorised for the activities referred to in Article 10(3) and Article 10(3): *'For particular cases where you choose to use techniques... Along with the project, an independent third-party report must be attached, which positively validates the effectiveness and adequacy of technical solutions, issued by a supervisory body authorised for these tasks in accordance with Royal Decree 2200/1995 of 28 December approving the Infrastructure Regulation for Quality and Industrial Safety'* Isn't this the same type of body? If they are the same bodies as this provision might exist? Could bodies that are currently registered be unable to perform this role? Will it thus be necessary to make contact with two independent bodies, one to make the other request for the third party to be paid for the part of the property? If they are not the same bodies, who regulates that the body is qualified, by what criteria? List of bodies that are considered qualified and independent.	R. They are not the same bodies. One has some requirements set out in the text of the RD, and the other has other requirements, on a transitional basis.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		posed solutions, or grant authorisation.		
41	General Secretariat for Industry and Mines, Government of Andalucía	Third transitional provision	The scope of this provision should be extended to the validation of equivalent safety techniques and performance designs provided for in Article 10 of the RSCIEI, since there are already accredited supervisory bodies for this purpose.	R. There are currently no such bodies, because the 2004 RSCIEI does not include them. There may currently be entities accredited by ENAC to perform similar tasks, but that are not qualified as a CB for the 2004 RSCIEI because it does not take these into account. In any event, the transition process is expected to be short.
42	particular	*Fourth transitional provision. Implementation of the changes made to the Fire Protection Facilities Regulation*	It is not clarified what will happen with the stock that might remain of equipment that after the transition period is left with its technical evaluation expired.	R. The deadlines for adaptation are long enough so that this situation does not arise.
43	TECNIFUEGO	Fourth transitional provision. Implementation of the changes made to the Fire Protection Facilities Regulation The changes made to the fifth final provision to the Fire Protection Facilities Regulation, approved by Royal Decree 513/2017 of 22 May, will be subject to the following transitional periods: 1. New facilities of equipment or systems, subject to new requirements. Products (equipment or systems) placed on the market or installed and whose requirements have been modified, shall have a maximum period of two years, from the date of entry into force of this Royal Decree, to comply with the new requirements. Changes regarding the design of the facilities and the references of UNE standards will also have the same	It is proposed to extend the transitional period for fixed extinguishing systems for commercial kitchens, see text in red. Manufacturers have made the effort to obtain the technical assessment of the suitability of these systems to adapt to the RIPCI barely two years ago and some recently. If the period of validity of the technical suitability assessment is extended to five years, manufacturers will have time to recover the costs of their high investment. It is proposed the following text: Products (equipment or systems) placed on the market or installed and whose requirements have been modified, shall have a maximum period of two years, from the date of entry into force of this Royal Decree, to comply with the new requirements. Changes regarding the design of the facilities and the references of UNE standards will also have the same transitional period. In the case of fixed systems of extinction of commercial kitchens this period will be extended to five years.	R. The transitional period for these products is changed.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		transitional period.		
44	SG for Industry, Energy and Mines. Murcia	DT4. Paragraph 1 'New facilities of equipment or systems subject to new requirements' of the 'Fourth transitional provision. Implementation of the changes made to the Fire Protection Facilities Regulation', in the following text: 1. New facilities of equipment or systems, subject to new requirements. Products (equipment or systems) placed on the market or installed and whose requirements have been modified, shall have a maximum period of two years, from the date of entry into force of this Royal Decree, to comply with the new requirements. Changes regarding the design of the facilities and the references of UNE standards will also have the same transitional period. During this transitional period, both equipment or systems that meet the new requirements, and those previously in force may be placed on the market and installed. In the case of fixed extinguishing systems in commercial kitchens, during the transitional period may be installed both the systems with the new certification and those that have already obtained the technical evaluation in accordance with Article 5.3, which in any case will be understood as expired at the end of the transitional period.	It is proposed to amend the last paragraph of section 1, as follows: 1. New facilities of equipment or systems, subject to new requirements. Products (equipment or systems) placed on the market or installed and whose requirements have been modified, shall have a maximum period of two years, from the date of entry into force of this Royal Decree, to comply with the new requirements. Changes regarding the design of the facilities and the references of UNE standards will also have the same transitional period. During this transitional period, both equipment or systems that meet the new requirements, and those previously in force may be placed on the market and installed. In the case of fixed extinguishing systems in commercial kitchens, **for a maximum period of five years, from the date of entry into force of this Royal Decree**, both the systems with the new certification and those that have already obtained the technical evaluation according to Article 5.3 may be installed, which in any case will be deemed expired at the end of the transitional period.	R. The transitional period for these products is changed.
45	General Secretar-	Fourth transitional Provision, section	The wording of the first paragraph of this section is confus-	A. The wording of the text was changed

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	iat for Industry and Mines, Government of Andalucía	1	ing and seems to require adaptation to the new requirements. While the second paragraph would provide the option of both new and old requirements. We therefore consider it appropriate to revise the wording, which seems contradictory or at least confusing.	to make it clearer.
46	Superior Council of the Colleges of Architects of Spain	Fourth transitional provision of the draft RSCIEI, section 1, in the following text: 'New facilities of equipment or systems, subject to new requirements. Products (equipment or systems) placed on the market or installed and whose requirements have been modified, shall have a maximum period of two years, from the date of entry into force of this Royal Decree, to comply with the new requirements. Similarly, changes in the design of facilities and references to UNE standards shall have the same transitional period.'	If they are new facilities and systems, subject to new requirements, it is not clear why they should be updated based on the new Royal Decree or why the transitional deadlines are longer for elements already installed.	A. The wording of the text was changed to make it clearer.
47	IETcc	New transitional Provision.	Introducing a new fifth transitional provision is proposed. This type of transitional provisions are common in the approving new documents of the CTE and their amendments, and it has been verified that they are necessary to adapt to the process of drafting a building project and to limit the period between the granting of a permit and the start of the works avoiding abuse at the beginning of these works. *'Fifth transitional provision. Application of the amendments made to the Technical Building Code.* *The amendments to the Technical Building Code approved by this Royal Decree shall not apply to works of new construction and those of extension, alteration, reform or rehabilitation of existing buildings that have requested the municipal permit of works at the entry into force of this Royal Decree.* *Such works shall begin within the maximum period of efficiency of said permit, in accordance with its governing regulations or, failing that, within six months of said permit being*	A. The proposed text has been added. With regard to the transitional deadlines, it should be noted that these must be coordinated together with the date of entry into force of the RD that is put in place. Depending on the date set for entry into force, transitional deadlines will be fixed.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			granted. Otherwise, the projects must be adapted to the amendments of the Technical Building Code that are approved by this Royal Decree. *The amendments to the Technical Building Code approved by this Royal Decree will apply to new construction works and those of extension, alteration, reform or rehabilitation of existing buildings for which municipal permit of works is requested within six months from the entry into force of this Royal Decree.* *Such works shall begin within the maximum period of efficiency of said permit, in accordance with its governing regulations or, failing that, within six months of said permit being granted. Otherwise, the projects must be adapted to the amendments of the Technical Building Code that are approved by this Royal Decree.* *The amendments to the Technical Building Code approved by this Royal Decree will be mandatory to new construction works and those of extension, alteration, reform or rehabilitation of existing buildings for which municipal permit of works is requested after the period of six months from the entry into force of this Royal Decree.*	
48	Superior Council of the Colleges of Architects of Spain	Sole repealing provision. Regulatory repeal of the draft RSCIEI, section 1, in the following text: '1. Royal Decree 2267/2004 of 3 December, approving the Regulation on fire safety in industrial establishments, is repealed'.	The entry into force of the new decree according to Tenth Final Provision is six months after its publication in the 'Official State Gazette'. It is not specified whether Royal Decree 2267/2004 is repealed on the date of publication of the new regulation in 'Official State Gazette' or six months after its publication with its entry into force.	R. The current text is correct and clear enough. The text is providing a deadline for the entry into force of the entire RD, and therefore also for the provisions within it that repeal the previous regulations.
49	FEDAOC	First additional provision (a) concerning periodic inspections of establishments constructed in accordance with Royal Decree 2267/2004, and Article 13 of Chapter IV.	It is established that the periodicity of inspections becomes five years regardless of the level of intrinsic risk of the establishment. It is not indicated from what date this periodicity begins: whether it is from the entry into force of the new regulation, or if the maximum time limits for next inspection are those indicated in the periodic inspection certificates already issued. For reasons of clarity and to avoid cumulation of inspections, we believe it is better to respect the deadlines indicated in the certificates already issued. It is proposed to include a new transitional provision, indicating:	A. The proposed text has been added.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			'transitional Provision XX: existing establishments which have been constructed in accordance with Royal Decree 2267/0/2004 and whose periodic inspection is in force at the entry of this Regulation shall carry out the following periodic inspection within the maximum period set by the relevant inspection certificate.'	
50	particular	Fourth final provision. UNE and other internationally recognised standards	It is lawful to refer by legislation such as the RSCIEI to other regulations not freely accessible. The application of this standard involves paying for the acquisition of UNE standards, in addition to updating. All this limits access of many technicians with economic limitations to undertaking their profession.	R. The citation of technical standards (UNE/EN/ISO) is something that has been performed in virtually all industrial safety regulations, as well as in European directives and regulations of new approach and CE marking since the last decades of the previous century. On the other hand, with regard to possible updates to standards, the applicable version is the one citing each regulation or directive.
51	FEDAOC	Fourth final provision. UNE and other internationally recognised standards.	We detected the absence of standard UNE 192005-1 of procedure for regulatory inspection, to homogenise the procedures of all CBs, as amended in other regulations of recent publication such as the regulation of refrigeration plants, in its amendment six of this document (includes standard UNE 192013:2022 Procedure for regulatory inspection. Refrigeration plants.) It is understood that a revision of this UNE standard should be carried out in parallel with the publication of the new regulation adapted to the amendments made.	A. The reference to the UNE standard indicated in its corresponding section has been added.
52	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Fourth final provision.	The current wording reads: 'Annex V to the Fire Safety Regulation in industrial establishments includes a list of UNE and other internationally recognised standards (...)'. **Proposal**: The logistics sector has been working with NFPA standards for years, motivated in part by the lack of UNE standards that reflect the design of modern fire facilities. It is requested that they be included in the list of internationally recognised standards, at the least NFPA standards.	R. The list of standards mentions only the standards that are explicitly included in the text of the regulation, which are also intended to belong to the European standardisation system (UNE, EN, ISO standards). Citing other references is not appropriate.
53	KREAN S.COOP	Fourth final provision. UNE and other internationally recognised standards	It mentions to us which standards are internationally recognised. Indicate.	R. The list of rules mentions only the rules explicitly contained in the text of

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		2. When one or more rules change their year of edition, edit subsequent amendments to them or publish new standards, must be updated in the list of standards, by decision of the person holding the Directorate-General for Industry and Small and Medium-sized Enterprises, on which the date from which the use of the old edition of the standard will no longer have regulatory effects must be recorded.	In which document is the update of the rules and their listing published? Is it considered valid, for example, when the list of standards approved by the Spanish Association of Standardisation is published in the Spanish Official State Gazette?	the regulation. Citing other references is not appropriate. On the other hand, updates of rules are published in the Spanish Official State Gazette explicitly stating that the list of a certain regulation is amended. (Generic publications in the Spanish Official State Gazette on UNE standard updates do not update the lists of standards.)
54	SFPE Spain	**Fourth final provision. *UNE and other internationally recognised standards.*** *'3. Where no such resolution has occurred, the edition of the subsequent standard to the one in the list of standards, **shall also be deemed to comply with the regulatory conditions provided that it does not modify basic criteria and is limited to updating tests or increasing the intrinsic safety of the corresponding material.'***	Vagueness. who judges whether the changes alter basic criteria?	C. This is a voluntary option. If it is to be used, the case must be analysed and justified by the project executor/installer himself under his responsibility, and the competent authorities may decide if they see fit. This is the usual way of operating national industrial safety regulations governing facilities.
55	Official College of Industrial Engineers of the Valencian Community	Final provision	Page 26. **It is proposed: Adding an additional final provision** modifying section 5.2.2.1 of the Structural Code so that where you put: *'In cases of building structures, the provisions of Basic Document DB-SI of the Technical Building Code gives the fire resistance requirements for each structural element'.* **It is proposed:** *'In the case of building structures, the fire resistance required for each structural element is defined by the provisions of the Basic Document DBSI of the Technical Building Code **and the Fire Safety Regulation in Industrial establishments**'.* Industrial buildings are also buildings. These are industrial	R. It is not appropriate to change the Structural Code and, in any case, it is understood that this change is not necessary and that with the current text this is clear.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			buildings and for their project and structural calculation is also applicable to the Structural Code.	
56	Official College of Industrial Engineers of the Valencian Community	Article 1. Object	Page 1 and page 27. Only in these two sections of the regulation appears the term **'environment'** and nowhere else in the regulation. It seems strange that the spirit and one of the objectives of the subject-matter of the regulation is not further elaborated in any section. **It is proposed:** Including some section on this subject, which is so important and necessary today, that indicates, although at least in an indicative, qualitative way, how to meet this objective, would be an inescapable step. An assessment of the carbon footprint of the FP project would allow project executors and equipment and facility manufacturers to raise awareness of the issue. There are many accessible databases that make it possible to assess the carbon footprint or to draw up an 'environmental budget' of the FP project, each unit of work bears its footprint. In addition, ISO 14000 and associated can be a reference, as can the international standards that already exist on the subject.	R. It is understood that the current text is appropriate, and that it is not appropriate to make any changes or to add the extra sections that are discussed.
57	Catalonia Safety Cluster Against Fires (CLÚSIC)	Article 1. Section 1. Page 27. paragraph 1 The aim of this regulation is to lay down the requirements to be met by industrial establishments as regards their safety in the event of fires, to prevent the occurrence of fires and to provide an adequate response in case of occurrence, by establishing measures to facilitate their rapid detection, to limit their spread and to enable their extinction, with the aim of minimising the risk of damage to people, property and the environment.	The regulation should make clear what objectives it pursues, and define the requirements for achieving those objectives. Now, only the evacuation objective is clear. When it is possible to increase the size of the sectors in a general way and not to justify fire resistance, it follows that it is not intended to minimise its own damage, or to facilitate intervention. When in buildings that share structure or are very close, it is not necessary to justify the structural behaviour in order not to harm third parties it could be inferred that the protection of third-party property is not sought either. If the objectives are not made clear, it is impossible to properly undertake a financial project and very complicated to develop the requirements in a coherent way. On the other hand, the regulation does not provide for any prescription seeking to minimise the effect of the fire on the environment, such as the collection and treatment of extin-	R. The text is sufficiently clear. The objectives are perfectly specified in the articles of the regulation, and are set out in Annexes II to IV. No changes should be made. With regard to the relationship of the effect of the fire on the environment, this is achieved indirectly by applying the objectives of the regulation, by seeking to prevent or minimise their occurrence.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			guishing waters. Nor do the basic requirements of Article 6 take this into account. **PROPOSAL:** The purpose of this regulation is to establish the requirements industrial establishments must comply with as regards their safety in the event of fires, to prevent the occurrence of fires and to provide an adequate response in case of occurrence, establishing measures to facilitate their rapid detection, limit their spread and enable their extinction, with the aim of minimising the risk of damage to persons and damage to third parties.	
58	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Article 1, paragraph 1: *The aim of this regulation is to lay down the requirements to be met by industrial establishments as regards their safety in the event of fires, to prevent the occurrence of fires and to provide an adequate response in case of occurrence, by establishing measures to facilitate their rapid detection, to limit their spread and to enable their extinction, with the aim of minimising the risk of damage to people, property and the environment.*	The regulation should make clear what objectives it pursues and define the requirements and means of achieving those objectives. If the objectives are not made clear, it is not possible to properly undertake a performance-based project. **Proposal:** modify text *The purpose of this regulation is to lay down the requirements to be met by industrial establishments as regards their safety in the event of fires, to prevent the occurrence of fires and to provide an adequate response in the event of occurrence, by establishing measures to facilitate their rapid detection, to limit their spread and to enable their extinction, with the aim of minimising the risk of damage to people and other, nearby establishments.*	R. The text is sufficiently clear. The objectives are perfectly specified in the articles of the regulation, and are set out in Annexes II to IV. No changes should be made.
59	FEDAOC	RSCIEI Article 1.2 object	In this point, as in R.D.2267/2004, it is not clear whether CB inspections are mandatory in this type of establishment with specific sectoral regulation. As prescribed in both Regulations, they will apply as a supplement or supplement to the provisions of these specific regulations. It would be advisable to clarify this issue on this point.	R. It is understood that the current text is sufficiently clear.
60	NEDGIA SA	Amendment RD 2267/2004 RSCIEI Article 1. Object (...) 2. The fire protection measures laid down in the current provisions gov-	Proposed drafting change: *2. The fire protection measures established in the current provisions that regulate industrial, sectoral or specific activities, will prevail over those established in this regulation.,–*	R. The current text is correct enough. No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		erning industrial, sectoral or specific activities shall take precedence over those established in this Regulation, which in these cases shall only be applied in a complementary manner, and for those aspects not provided for therein.	~~*which in these cases will only be applied in addition and for those aspects not provided for in them.*~~ Having sectoral regulations (examples: RD 656/2017 and RD 919/2006) in which the means of containment, safety distances, means of extinction and type of extinguishing agent to be used in the facilities are regulated, the RSCIEI should not apply, nor should it be complementary.	
61	AFELMA, Association of Spanish Insulating Mineral Wool Manufacturers	Article 1, Object, section 2 The fire protection measures laid down in the current provisions governing industrial, sectoral or specific activities shall take precedence over those established in this Regulation, which in these cases shall only be applied in a complementary manner, and for those aspects not provided for therein.	Certain specific activities or types of facilities do not have fire protection measures laid down in their implementing regulations. Although it does not make excessive sense that this new RSCIEI should make an inventory of these activities or facilities, at least it should regulate in this respect acceptable minimums in those in which the 'state of the art' demonstrates its already usual use in Spanish construction as of today. Therefore, although we agree with the paragraph contained in the power to regulate cautiously from DG Industrial Safety to correct those gaps that undoubtedly exist, we do not understand that cases such as the increasing use of photovoltaic facilities on roofs have not been reflected in Annex IV, and whose rapid growth is protected by the necessary Ecological Transition and Energy Independence marked by the European Union in its Roadmap to climate neutrality in 2050.	R. The objective of Annex IV is not to regulate in a precautionary manner things that are in a legal vacuum, but to regulate things that correspond to this regulation but which, because of their particularity, it is preferable to include them in a place other than annexes I, II or III. With regard to the content of the Annexes, and in particular on Annex IV, the most frequent and relevant cases have been included.
62	CEPREVEN	Text of the Regulation, Chapter I, Article 1(2). The fire protection measures laid down in the current provisions governing industrial, sectoral or specific activities shall take precedence over those established in this Regulation, which in these cases shall only be applied in a complementary manner, and for those aspects not provided for therein.	The complementary application of the RSCIEI in certain activities with specific regulations, such as waste landfills, may not be technically feasible, so we understand that in duly justified cases – such as the one indicated – compliance with the specific sectoral regulations (in this case, *Royal Decree 646/2020 of 7 July, regulating the disposal of waste by landfilling*) should suffice.	R. The current text is sufficiently clear, and does not require further detail. The detailed list of specific cases with specific legislation (which is also evolving over time) could, if deemed appropriate, be included in the implementation guide only as a reminder.
63	Naturgy Renovables SLU	Article 1. *Object* 1. The purpose of this regulation is to	It is not clear whether photovoltaic plants and solar farms, after 2005, the activity of which consists of centres for the	R. The current text is sufficiently clear, and does not require further detail.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		lay down the requirements to be met by industrial establishments as regards their safety in the event of fires, to prevent the occurrence of fires and to provide an adequate response in the event of occurrence, by establishing measures to facilitate their rapid detection, to limit their spread and to enable their extinction, with the aim of minimising the risk of damage to people, property and the environment. 2. The fire protection measures laid down in the current provisions governing industrial, sectoral or specific activities shall take precedence over those established in this Regulation, which in these cases shall only be applied in a complementary manner, and for those aspects not provided for therein.	transformation of solar energy into electric energy, with a layout similar to an electric substation, is affected by Royal Decree 2267/2004, or would be applied on a complementary basis as in the case of electrical substations.	
64	EXOLUM	Article 1. Object, point 2. The fire protection measures laid down in the current provisions governing industrial, sectoral or specific activities shall take precedence over those established in this Regulation, which in these cases shall only be applied in a complementary manner, and for those aspects not provided for therein.	Add the following sentence to point 2: *This order will be extended to inspections, in accordance with the inspection criteria of the sector-specific regulations.*	R. The current text is sufficiently clear, and does not require further detail.
65	General Secretariat for Industry and Mines, Government of Andalucía	RSCIEI, Article 1.2.	It is proposed to refer in this section to 'the current provisions governing activities **e facilities** industrial,..', since some of the provisions governing these aspects and mentioned in the current RSCIEI Guide, relate to facilities rather than activities.	A. The proposed text has been added.
66	IETcc	Article 2. Scope of application	It is noted that car parks for vehicles intended for transporting persons or goods have been removed from the scope of	C. It is understood that the most appropriate location for these cases is the use

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			the Regulation. Although note (1) has been removed from section I of the Object of the Introduction to DB SI, it is not clear what conditions should apply in these cases, whether those of 'parking use' or those of the new 'use warehouse'.	of parking. No changes are required to the text.
67	FEDAOC	Scope and scope: sixth final provision and Article 2 of Chapter I.	There are certain activities that, according to experience, are not well defined within the scope of CTE DB-SI or RD 2267/2004, and are not clarified in the present draft of RSCIEI. Among the activities liable to be confused and, in some cases, to be contradicted between administrations, we have: DPCs (data processing centres). These are increasingly numerous establishments that do not fit well with the uses of CTE DB-SI, nor fall within the definitions of Article 3.1 of Law 21/1992 of 16 July on Industry. Nor do they currently have specific rules. They can be large and with low or no occupancy, but the activity of which can be deemed strategic and requires regulations that collect these particularities for adequate fire protection. Facilities of electricity generation in what is not included in its specific regulations. Extraction, purification, desalination and water purification. Non-industrial laundries, including self-service launderettes. Although the CTE DB-SI foresees laundries as special risk premises, we understand that it is not applicable when the activity is itself laundry. Those providing external services, for example, to hotel or hospital establishments, would fall within the scope of the RSCIEI but public laundries cannot be considered in the same way. It would be necessary to clarify what happens to these uses explicitly, either to include these within the scope of the RSCIEI or, on the contrary, to exclude them.	R. The current text is sufficiently clear, and does not require further detail.
68	EDISTRIBUTION Redes Digitales, S.L.	On Article 2. Scope, if the activity of distributing electricity is included and, if applicable, to include this activity in a specific and unambiguous way in Table 1.5 of Annex I to that	Since the draft Royal Decree subject to submissions is to replace Royal Decree 2267/2004, it is necessary to clarify how the new RD will affect the electricity distribution sector, as the owner of industrial establishments, as defined in the wording of Article 3 and Annex I proposed.	R. The current text is sufficiently clear, and does not require further detail. In any event, where this Regulation has to be applied, Annex I provides several options for characterisation, and the use of

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		proposal for a Royal Decree, in order to undo the ambiguity of applying specific regulation or more general and complementary regulation.	Both in this proposal and in the current Royal Decree 2267/2004, fire protection measures are incorporated that are already regulated in the High Voltage Regulation (RD 337/2014), particularly in the ITC -RAT-14. In principle, it will be understood that the specific regulations (the RAT in our case) prevail over general regulations such as the one promoted in this deletion of RD, of additional application and for aspects not provided for in the aforementioned RAT. However, for example, in the ITC 14 Section 5 Other requirements, it is regulated that, in the case of substation buildings of first and second category, '*shall apply the provisions governing fire protection in industrial establishments*'. This implies that the specific regulation refers us to the general regulation (RD proposal) where there will be the situation that, since the activity of distribution of electrical energy does not appear specifically in Table 1.5 of Annex I (Fire Load Density Values and the Ci and Rmin Coefficients associated with each activity), necessary for calculating the Fire Load Density of the sector and the level of the intrinsic risk of it, it is not possible to properly design the buildings or coatings, resulting from a characterisation of the construction materials, fire resistance of the structures, compartmentalisation or evacuation. Therefore, if these buildings or enclosure have to comply with the specifications of this proposed RD, it is necessary to develop how to apply in the electricity sector the Annex I of 'CHARACTERISATION OF INDUSTRIAL ESTABLISHMENTS', which is basic in this RD, since the coefficients essential for the calculation are not defined for this activity (Table 1.5 of Annex I).	Table 1.5 of Annex I is not mandatory. In addition, it is usual that if there are specific regulations for specific activities, and the details to be applied are given there.
69	particular	Article 2. Scope of application 1. The scope of this regulation is industrial establishments, with those whose main use is industrial understood as such.	This wording excludes 'industrial buildings' proper from complying with any fire protection regulations, especially those containing several industrial establishments. Only Annex II refers to buildings in the classification and especially in 'evacuation of occupants'. The DB-SI specifies in its Introduction, item 'II Scope' the exclusion of industrial establishments and areas of industrial use.	R. They are not excluded as claimed. Industrial buildings are part of industrial establishments. No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			Proposal: add 'industrial buildings': 1. The scope of this regulation is industrial establishments *'and buildings'*, with those whose main use is industrial understood as such.	
70	particular	REGULATION ON FIRE SAFETY IN INDUSTRIAL ESTABLISHMENTS Article 2. *Scope of application* 1. The scope of this regulation is industrial establishments, with those whose main use is industrial understood as such. Industrial use for the purposes of this Regulation shall be deemed: a) Industrial activities, as defined in Article 3.1 of Law 21/1992 of 16 July, on Industry. b) Industrial storage as defined in Article 3. b) ancillary or complementary services to the activities covered by the preceding paragraphs. [...] 3. The following activities are excluded from the scope of this Regulation: [...] Article 3. *Definitions* For the purposes of this Regulation, the following definitions are laid down: a) Industrial establishment: Industrial establishment is understood to be that intended to be used under a differentiated ownership, and the main use of which is industrial, as referred to in Article 2.1. Industrial establishments may consist of a set of one or more buildings, parts thereof	The following alternative text is proposed: ***Article 2. Scope of application*** *1. The scope of this application is industrial establishments, taking as such those intended for:* *a) Industrial activities, as defined in Article 3.1 of Law 21/1992 of 16 July, on Industry.* *b) Industrial storage as defined in Article 3.* *[...] 3. The following activities* ***and their storages*** *are excluded from the scope of this regulation:* ***Article 3. Definitions*** *For the purposes of this Regulation, the following definitions are laid down:* *a) Industrial establishment: An establishment is understood to be the location intended to be used under a differentiated ownership, and whose project of construction or renovation works, as well as the beginning of the planned activity, are subject to administrative supervision. Industrial establishments are intended for the activities referred to in Article 2.1, and may consist of a set of one or more buildings, parts thereof and open spaces.* *b) Industrial storage: an activity intended exclusively to store products without the presence of the public, and which:* *i. is located in or is subsidiary to an industrial establishment;* *ii. or, in the absence of any applicable specific legislation, one the use of which derives from an industrial activity related to transport, referred to in Article 3.4(f) of Law 21/1992 on Industry, such as logistic storage or distribution of goods.* *Industrial storage is not for public use. Authorised persons familiar with the general security measures of the establishment shall have access.* *This Regulation does not apply to warehouses for excluded activities in Article 2.3.*	R. The current text is sufficiently clear, and does not require further detail. The definitions that have been included improve the understanding of the text compared to what it contained in the previous rules of procedure, and the wording that has been put in place has been in as detailed a way as possible.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		and open spaces. b) Industrial storage: Industrial warehouse means any enclosure, whether or not covered, intended exclusively for storing products, and which: i. is located in or is subsidiary to an industrial establishment; ii. or, in the absence of any applicable specific legislation, one the use of which derives from an industrial activity related to transport, referred to in Article 3.4(f) of Law 21/1992 on Industry, such as logistics warehouses or warehouses for the distribution of goods. Warehouses should not be open to the public, and should only be accessible to authorised persons familiar with the general security measures of the establishment. This Regulation does not apply to warehouses for excluded activities in Article 2.3.	**Reasons** for the amendments proposed. The scope of application avoids unnecessary circumlocutions to directly refer to the industrial use activities set out in the Law, avoiding discerning whether the use is principal or not. The existence of industrial activities already involves the industrial establishment (except in the case of a pure installation, such as a pipeline, power line, etc.). This industrial activity may involve other non-industrial activities and, depending on their size, the regulation is laid down in Article 4.2. If ancillary services or services associated with industry or storage are not at the same location, it may lead to uncertainty in the scope. If they are at the same location, they are already part of the establishment and their regulation is provided for in Article 4.2 if they are not industrial. It is therefore proposed to delete section 'c'. The regulation refers to 'industrial' and 'non-industrial' establishments. Non-industrial establishments are regulated by the CTE, and it includes a definition. It seems reasonable to agree with the CTE in the definition of 'establishment', except in the case of being in a building, to then establish the condition for it to be 'industrial' and specify that it may be in one or more buildings, part of them or even open or uncovered spaces. The regulation makes constant references to storage, which is the activity of storing and the product stored. The warehouse is the establishment or part thereof intended for storage. The new definition is more consistent by not mixing concepts, and does not prevent the establishment of requirements for the warehouse as well. The non-public use of storage is reinforced in the regulation. The Technical Guide could explain that storage with public presence will be regulated by the DB SI in the field of commercial use or, if the fire load reaches 3 million MJ, in the field of use Warehouse, in accordance with the new section 6 of Chapter III General criteria of application, of the Introduction to DB SI proposed in the Royal Decree.	

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71	Subdirectorate-General for Industry, Government of Valencia	Article 2. Scope of application '1. The scope of this regulation is industrial establishments, with those whose main use is industrial understood as such. Industrial use for the purposes of this Regulation shall be deemed to be:'	Repair shops and car parks for passenger transport and freight transport have been eliminated. We understand that repair shops could fall within the definition of industrial activity in section (a), but vehicle car parks will no longer fall within the scope of the RSCIEI, they should be included. It is not clear whether pyrotechnics fall within the scope of the regulation. They are not explicitly excluded, but they are a typology of establishment that would require special requirements. Perhaps they could be included as a specific typology within Annex IV.	PA. Vehicle workshops have been added to the text. On the other hand, mentioning pyrotechnics sis not appropriate.
72	PHARMAINDUSTRY	*Article 2. Scope* *...* *2. It shall also apply to industries existing before the entry into force of this Regulation where their level of intrinsic risk, their situation or their characteristics imply a serious risk to persons, goods or the environment, and this is determined by the competent regional administration.*	*Article 2. Scope* *... 2. (delete)* *<u>Justification:</u>* *It is proposed that point 2 of Article 2 be deleted.* *This paragraph is already identical in the current Royal Decree 2267/2004 of 3 December approving the Regulation on fire safety in industrial establishments, RSCIEI.* *As a general rule, safety regulations apply from their entry into force thereafter.* *Where a specific area of retroactivity is established, the Royal Decree itself or another legal provision that publishes a Regulation establishes a transitional regime and adjustment deadlines; and are therefore public and known.* *In the opinion of this Association, the provision, to which we refer, establishes a high degree of discretion/legal uncertainty in relation to the industries existing before the entry into force of the RSCIEI since, where appropriate, it calls into question functionality or the structure of certain existing buildings.* *We do not know whether since the entry into force of the current RSCIEI (2005), any regional authority has used the aforementioned provision of Article 2(2).*	R. The structure and wording of the article is changed, however, the power of the authorities to be able to force adaptation in cases involving a serious risk is maintained. This provision is already included in the previous regulation and it is understood that it is appropriate to maintain this, although in practice it would only be used in very exceptional cases.
73	NEDGIA SA	RD 2267/2004 RSCIEI (text unamended) Article 2. Scope (...). 2. It shall also apply to industries existing before the entry into force of	With the inclusion of the new Article 3 of definitions that will amend Article 2.1 scope, we believe that it is missing to specify Article 2.2, which will maintain the current wording, and to clarify who it refers to when it says '*industries*'; does it refer to 'industrial activities", 'industrial establishments',	A. The text has been changed to make it clearer.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		this Regulation where their level of intrinsic risk, their situation or their characteristics imply a serious risk to persons, goods or the environment, and this is determined by the competent regional administration.	or to another grouping?	
74	NEDGIA SA	RD 2267/2004 RSCIEI (text unamended) Article 2. Scope (...). 2. It shall also apply to industries existing before the entry into force of this Regulation where their level of intrinsic risk, their situation or their characteristics imply a serious risk to persons, goods or the environment, and this is determined by the competent regional administration.	The following text in red is proposed: *2. It shall also apply to industries existing before the entry into force of this Regulation when their level of intrinsic risk, their situation or their characteristics imply a serious risk to persons, goods or the environment, and this is determined by the competent regional administration, unless there is regulation, sectoral or specific, that already regulates this risk.*	R. The structure and wording of the article is changed, however, the power of the authorities to be able to force adaptation in cases involving a serious risk is maintained. This provision is already included in the previous regulation and it is understood that it is appropriate to maintain this, although in practice it would only be used in very exceptional cases.
75	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Article 2 of the RSCIEI, section 2 '2. It shall also apply to industries existing before the entry into force of this Regulation where their level of intrinsic risk, their situation or their characteristics imply a serious risk to persons, goods or the environment, and this is determined by the competent regional administration.'	Where it says 'when its intrinsic risk level', replace with 'when the level of risk intrinsic to its sectors or fire areas'	R. The current text is correct and clear enough. No changes are necessary.
76	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Article 2. Heading 2 Scope.	Where it says: '2. It shall also apply to existing industries prior to this regulation entering into force where its level of intrinsic risk, its situation or its characteristics imply a serious risk to persons, property or the environment, and is determined by the competent regional administration.' Proposal: 2. It will also apply to industries existing before the entry into force of this regulation when their level of intrinsic risk, their situation or their characteristics imply a serious risk to people, goods or the environment, provided that they were not foreseen in the project that obtained the enabling title in force where the corrective measures required for this purpose are included and so determined in a	R. The structure and wording of the article is changed, however, the power of the authorities to be able to force adaptation in cases involving a serious risk is maintained. This provision is already included in the previous regulation and it is understood that it is appropriate to maintain this, although in practice it would only be used in very exceptional cases.

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			reasoned manner by the competent regional administration Reason: In pre-existing industries with pre-existing urban enabling title, they must have fire-risk corrective measures. The discretion empowering the regional administration to require discretionary application of the regulation is eliminated, giving market operators legal certainty. An extension of the scope of the Regulation to existing activities in terms of the text of Article 2.2 contradicts the transitional arrangements for existing industrial establishments set out in the first additional provision of the Regulation.	
77	EXOLUM	Article 2, point 2. It shall also apply to industries existing before the entry into force of this Regulation where their level of intrinsic risk, their situation or their characteristics imply a serious risk to persons, goods or the environment, and this is determined by the competent regional administration.	At the end of point 2, add the following sentence: *Except where its intrinsic risk is already regulated by other sector-specific regulations (chemical storage, oil facilities and SEVESO).*	R. The current text is correct and clear enough. No changes are necessary.
78	Superior Council of the Colleges of Architects of Spain	RSCIEI. In 'Article 2. Scope', point 2. 'It shall also apply to industries existing before the entry into force of this Regulation where their level of intrinsic risk, their situation or their characteristics entail a serious risk to persons, property or the environment, and this is determined by the competent regional administration.'	It would be useful to specify in which cases the level of intrinsic risk, situation or characteristics of existing industries is deemed to pose a serious risk to people, goods or the environment.	R. The current text is correct and clear enough. No changes are necessary.
79	STATE AGENCY FOR RAILWAY SAFETY	Article 2.3 of the Regulation on fire safety in industrial establishments, in the following text: 'The following activities are excluded from the scope of this Regulation: a) Those developed in nuclear and radioactive facilities or facilities; b) The extraction of minerals; c) Agricultural and livestock activities;	It is proposed to add as excluded activities those corresponding to rail freight terminals and railway maintenance bases of the rail network of general interest. '*e) Those developed in rail freight terminals and maintenance bases of the railway network of general interest.*' In these facilities, there is no storage, no logistic warehouses and no distribution of goods. Freight terminals carry out change-of-mode operations, and rail operations for routing freight wagons between origin and destination.	A. It is agreed to add the following text, which reflects the specific case of the submission: 'service facilities defined in Article 42.1 of Law 38/2015 of 29 September on the Railway Sector'

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		d) And facilities for military purposes.'		
80	Service for Preventing and Extinguishing Fires and Rescue of the City of Vitoria-Gasteiz	CHAPTER I. Article 2.3.c Agricultural and livestock activities are excluded	PROPOSAL: Defining whether a storage of straw dehydrators/incinerators, or a grain warehouse in a cooperative, are agricultural or industrial activity. The requirements indicated for storage of solid materials in Type D Areas indicated in ANNEX II, Part 1. Article 1.6. are insufficient to address fires from these straw storages.	R. The text of the article already makes clear the cases that come in and are excluded. However, if it were appropriate to provide concrete examples for guidance, they could be included in the future implementation guide.
81	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Chapter I, Article 2.3. 'The following activities are excluded from the scope of this Regulation: 'those of **mineral extraction**' '**agrarian and livestock activities**'	Unequivocally define **agricultural activity** or refer to other legislation in which it is defined, clarifying that if the nature of agricultural products (e.g. processing them into both human and animal food) is not excluded. This same applies to mining products.	R. The text of the article already makes clear the cases that come in and are excluded.
82	particular	Article 2 Scope of application Delete point 3(c)	**Include a point 4** stating: *'the conditions of fire protection of agricultural and livestock activities and buildings which are not included in Article 3.1 of Law 21/1992 shall be implemented by this Regulation. The implementation, monitoring and action in case of fires of these activities will be carried out by local administrations and others that are competent. Articles 11 and 13 of this Regulation shall not apply to them.'* COMMENT: There are buildings, (units), deemed as agricultural and agricultural activity that are not subject to Law 21/1992 but that do not have specific or sectoral fire regulations. It does not make sense to apply the DB SI to this type of buildings or buildings when they are very similar to plants although it is not mandatory for them to pass the administrative procedure of their registration or start up as a plant.	R. The text of the article already makes clear the cases that come in and are excluded.
83	STATE AGENCY FOR RAILWAY SAFETY	Article 3 of the Regulation on fire safety in industrial establishments. Section (b)ii. Amending the following text is proposed: 'or, in the absence of any applicable specific legislation, the use of which results from an industrial activity related to transport referred to in Article 3.4(f) of Law 21/1992 on Industry,	Referring to industrial warehouses for the distribution of goods is proposed. The proposal aims to limit the scope to industrial goods warehouses. This is in line with the Regulation on fire safety in industrial establishments (Chapter I, General provisions). The activities carried out in passenger railway stations are not deemed industrial activities, even if they are related to transport (e.g. catering warehouses), since they are not directed to any of the cases included in Article 3 of Law	R. The current text is clear enough. No changes are necessary. In any event, it would make no sense to define industrial warehouse with a definition where it includes the same term it intends to define (circular definition).

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		such as logistic warehouses or warehouses for the distribution of goods.'	21/1992. Amending the paragraph as follows is proposed: *'or, in the absence of any applicable specific legislation, the one whose use derives from an industrial activity related to transport, referred to in Article 3.4(f) of Law 21/1992 on Industry, such as logistics warehouses or* ***industrial*** *distribution warehouses.*	
84	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	RSCIEI Article 3. Definitions	In the definition of industrial establishment it is deemed necessary to add a clarification to the concept of differentiated ownership 'Industrial establishment: Industrial establishment is understood to be that intended to be used under a differentiated ownership, and the main use of which is industrial, as referred to in Article 2.1. Industrial establishments may consist of a set of one or more buildings, parts thereof and open spaces.' It is proposed to add 'this differentiated ownership may consist of a single natural or legal person or several perfectly identified'	PA. A text similar to the one proposed, based on the same concept already included in the CTE DB-SI, has been added with regard to the concept of subsidiarity.
85	CEPREVEN	Article 3, heading (a). a) Industrial establishment: Industrial establishment is understood to be that intended to be used under a differentiated ownership, and the main use of which is industrial, as referred to in Article 2.1. Industrial establishments may consist of a set of one or more buildings, parts thereof and open spaces.	It is not specified whether ownership should be interpreted in terms of ownership or operation. This is not a trivial issue, as it might generate confusion when interpreting whether a sector is type B or type C.	PA. A text based on the same concept that has already been included in the CTE DB-SI has been added with regard to the concept of subsidiarity.
86	Official College of Industrial Engineers of the Valencian Community	Article 3. *Definitions.*	Page 28. This article defines Industrial Establishment, in **ANNEX I. 2. Identification of fire sectors and areas**– (Page: 5 of 24) are defined Fire Sector and Fire Area; however, there is no definition of industrial building that is the intermediate element between Establishment and sector. **<u>It is proposed:</u>** The definition of **Industrial Building** should be included. In the draft of the new regulation, the characterisation of	R. The current text is correct and clear enough. Certain main definitions are included in the articles and in the annexes, and later in the typologies of Annex I, the details on how to make the specific classifications in each section. No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			establishments is made from the classification of their buildings and their open spaces, along the different sections of ANNEX I various approaches to what is a building are made, but all are partial and incomplete. A clear and unambiguous definition of building is essential for the proper application of the regulation, for the good of all. By joining all the approximations in Annex I, you can obtain a definition that should be completed.	
87	General Secretariat for Industry and Mines, Government of Andalucía	RSCIEI, Article 3(a).	Doubts arise about the concept of 'differentiated ownership' and its possible ambiguity.	PA. A text based on the same concept that has already been included in the CTE DB-SI has been added with regard to the concept of subsidiarity.
88	THE COMMUNITY OF MADRID FIRE BRIGADE	**Article 3 (...)** b) Industrial storage: Industrial warehouse means any enclosure, whether or not covered, intended exclusively for storing products, and which: i. is located in or is subsidiary to an industrial establishment; ii. or, in the absence of any applicable specific legislation, one the use of which derives from an industrial activity related to transport, referred to in Article 3.4(f) of Law 21/1992 on Industry, such as logistics warehouses or warehouses for the distribution of goods. **Warehouses should not be open to the public, and should only be accessible to authorised persons familiar with the general security measures of the establishment.** This Regulation does not apply to warehouses for the excluded activities in Article 2.3.	**Article 3 (...)** It is noted, in general, that waste management industries have not been explicitly considered in this regulation. The paragraph relating to *'stores not open to the public*' leaves out facilities of increasing interest such as Clean Points, Breakdowns and recycling facilities. Medium-fire load density values for this type of recycling facility have not been considered in the RSCIEI project.	R. The definitions and the text are sufficiently clear. There is no need to add further clarifications.
89	ASSOCIATION OF DEVELOPERS,	Article 3. Definitions. b) industrial storage	Where it says: 'b) Industrial storage: What is understood are industrial warehouse means any enclosure, whether cov-	PA. Part of the proposal, which clarifies the definition, has been added to the

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	OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)		ered or not, intended exclusively for storing products, and which: i. is located in an industrial establishment or is ancillary to it, ii. or, in the absence of specific applicable legislation, one the use of which derives from an industrial activity related to transport referred to in Article 3.4(f) of Law 21/1992 on Industry, such as logistic warehouses or warehouses for the distribution of goods.' **Proposal**: complete the definition in heading ii. 'b) Industrial storage: Industrial warehouse means any enclosure, whether covered or not, intended mostly for storing products, and which: – it is located in or auxiliary to an industrial establishment, – or, in the absence of any applicable specific legislation, one the use of which derives from an industrial activity related to transport, referred to in Article 3.4(f) of Law 21/1992 on Industry, such as logistic warehouses or warehouses for the distribution of goods. Storage usage includes activities whose object is the reception, deposit, warehousing, custody, sorting and distribution of goods, products and goods. Excluded are warehouses attached to other non-industrial uses. The following categories are differentiated: 1-Wholesale storage: Those warehouses exclusively supplying to wholesalers, installers, manufacturers and distributors 2-Storage with home delivery: When warehouses have a sales service to private individuals through home delivery. 3-Logistics storage: Understand the activities intended for the receiving of cargo, fractionation and deposit of the same and product distribution.' **Reason**: to define correctly the use of storage, in particular its logistic category, not contained in the Industry Law to which the Regulation refers. Article 3.4(f) of Law 21/1992 on Industry is worded as follows: *f) Industrial activities related to transport and telecommunications.*	text. However, it is not intended to include a definition that is excessively long or to make sub-classifications that are then not used in the rest of the regulation.
90	ASSOCIATION OF DEVELOPERS,	Article 3.Definitions. b) Industrial storage:	'Industrial warehouse means any enclosure, whether or not covered, intended **exclusively** to store products, and which	A. The has been amended to further clarify the concept.

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	OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)		(...)' **Proposal**: replacing the word '**exclusively**' with '**mostly**'. **Reason**: the word 'exclusively' may lead to rigid interpretations that exclude from the concept of storage buildings which, being warehouses in a very high percentage of their function, have other activities related to the stored goods: preparation of orders, minor repairs, etc., which are not properly storage but part of the logistics activity.	
91	Professional Association of Fire Technicians (APTB)	Chapter 1 'General provisions', Article 3(b) in the following text: 'Industrial storage: Industrial warehouse means any enclosure, whether or not covered, intended exclusively for storing products, and which: it is located in an industrial establishment or one **supplementary to it**	What does it mean that **it is supplementary to it**? If, in a street of a industrial estate, there is a factory of plastic bottles and in another street of the same polygon or in another polygon, or even in another city, there is a warehouse owned by the manufacturer where the finished plastic bottles are stored. Is that warehouse supplementary to the factory? How will supervisory experts verify that this is a supplementary warehouse?	R. The current text is sufficiently clear in this respect. No changes are necessary. (In any event, note that this definition as a whole has been modified to make it more detailed, as a result of all the submissions received.)
92	General Secretariat for Industry and Mines, Government of Andalucía	RSCIEI, Article 3(b)ii.	It is not clear that logistics warehouses or warehouses for distributing goods are regarded as an industrial activity related to transport, as referred to in Article 3.4(f) of Law 21/1992 on Industry. We therefore do not see this reference as correct, which could be extrapolated with effects beyond the RSCIEI. Therefore, if these warehouses are to be included in the scope of the RSCIEI, we understand that it can be done with a direct reference to these, without including them as examples of such industrial activities.	PA. The wording of this definition is amended to make it more precise.
93	KREAN S.COOP	Article 3. Definitions 'b) Industrial storage: The following is understood... *Warehouses should not be open to the public and should only be accessible to authorised persons who are familiar with the establishment's general security measures*.' Article 4. Regulatory compatibility '2. When within an industrial establishment other subsidiary activities coexist with the industrial activity... b) *Commercial: constructed area ex-*	Within what classification are IKEA warehouses and similar warehouses, where part of the warehouse is accessible to the public even the collection area and shopping areas are located in those storage spaces?	C. The submission is a comment that does not include specific proposals. In any event, the texts proposed in the draft are sufficiently clear on the subject (both the text of these definitions and those of the CTE DB-SI should be read). No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ceeding 250 m². ... *d) Public Buildings: constructed area exceeding 250 m²*. ... h) *Several uses (a), (b), (c), (d) or (f) adjacent or in the same sector: built more than 250 m² among all of them*. .... These spaces, when they exceed the indicated surfaces, must include a fire sector independent of the areas with industrial use, in addition to complying with the requirements set out in the CTE DB-SI.		
94	Superior Council of the Colleges of Architects of Spain	*Regulation on fire safety in industrial establishments* *Article 3. Definitions* *'b) Industrial storage: ...*	The comment on point 1 of the sixth final Provision is reiterated. Section (b) on warehouses for transport-related activities could be understood as including car parks for transporting people. Otherwise, more specific wording and clarification is needed in the respective areas of application of the RSCIEI and CTE.	R. It is not appropriate to cite car parks within the definition of industrial storage.
95	Superior Council of the Colleges of Architects of Spain	RSCIEI. In Article 3. Definitions, section (b) on 'Industrial storage' reads as follows: 'Industrial warehouse means any enclosure, whether or not covered, intended solely for the purpose of storing products, and which:'	It would be useful to specify what kind of products.	R. The current text is correct and clear enough on this aspect. No changes are necessary. (In any event, note that this definition as a whole has been modified to make it more detailed, as a result of all the submissions received.)
96	Superior Council of the Colleges of Architects of Spain	RSCIEI. In Article 3. Definitions, section (b) on 'Industrial storage' reads as follows: Warehouses should not be open to the public, and should only be accessible to authorised persons who are familiar with the general security measures of the establishment.	Clarify whether this sentence is a requirement for industrial storage, and how this aspect of the exclusive entry of authorised persons should be monitored.	R. The current text is correct and clear enough. No changes are necessary.
97	Catalonia Safety Cluster Against Fires (CLÚSIC)	Article. 3. Page 28. paragraph c. Passive fire protection: This refers to that protection derived from the construction requirements of the es-	It is not very correct to say that passive protection is aimed at preventing fire and facilitating extinction. **PROPOSAL:** It is proposed to amend the text and use the definition of	R. The definition is adapted to the case law of the regulations (industrial establishments). No need to make changes.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		tablishments. Its purpose is to prevent the occurrence of a fire, prevent or delay its spread, and facilitate both the fire extinction and the evacuation.	UNE-ISO 13943:2018. Method used to reduce or prevent the spread and effects of fire, heat or smoke through the proper design or use of materials. and which does not require detection or activation by detection	
98	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Article 3. Page 28. paragraph d.** Active fire protection: This refers to the set of means, equipment and systems, whether manual or automatic, whose specific functions are to act actively and directly in the protection against fire, by means of the detection, control or extinction thereof, facilitating the evacuation of the occupants and preventing the fire from spreading.	**PROPOSAL:** It is proposed to amend the text and use the definition of UNE-ISO 13943:2018. Method(s) used to reduce or prevent the spread and effects of fire, heat or smoke by means of fire detection or suppression and which requires a certain amount of movement or that the response is activated.	R. The current text is correct and in line with the definition of RD513/2017 (RIPCI). No changes are necessary.
99	Catalonia Safety Cluster Against Fires (CLÚSIC)	Article. 3. Page 28. paragraph (e) and (f).	Equivalent security technique and performance design is the same. **PROPOSAL:** It is proposed to unify into a single definition in order to simplify: Equivalent safety technique and performance design: This refers to the adoption of a solution or set of technical solutions which differ in whole or in part from the technical requirements set out in this Regulation, and which have been specifically designed for a particular site taking into account all factors relating to it (such as operating conditions and intended use). The proposed set of technical solutions should ensure that the level of safety offered is equal to or greater than that which would be achieved when applying the requirements set out in this Regulation.	R. In the draft both definitions are not the same, and each one has its particularities, as well as in the articulation of each of these concepts concrete requirements are placed on one and the other. Unifying these is not appropriate.
100	particular	RSCIEI Article 3(f): '...must ensure that the level of security offered is equal to or greater than **that which** would be obtained..."	Typo. Remove 'that which'	A. Typo has been corrected.
101	CIVIL PROTECTION AND	Chapter I, Article 3, Definitions: g) '**Competent, qualified** expert per-	Specifying to **which university graduates** is referred to, taking into account that they usually sign qualified projects	R. It is not appropriate to include this type of content in this RD. The text pro-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	son: the university-qualified expert person with specific competences in the field of this Regulation.'	such as chemical engineers, telecommunications, biologists, etc.	posed in the draft is sufficiently clear.
102	Official College of Industrial Engineers of the Valencian Community	Article 3. *Definitions. (g)*	Page 28. Where it says: *'Competent, qualified expert person: The expert, university-qualified person with competencies specific in the subject matter of this regulation'* **It is proposed:** *'Competent, qualified expert person: The university-qualified expert person with **legal attributions** specific in the subject matter of this regulation'* This proposal is related to the previous one. Spain is a country with regulated professions, to which professional powers are legally assigned. A competence is not an attribution, it is a part of an attribution. The legislation sets out the powers of regulated professions.	R. The current wording is maintained. The definition is already contained in a Market Unit Agreement and applies in a cross-cutting manner to all industrial safety regulations (In those industrial safety regulations where a competent expert is required to perform certain functions such as drafting and signing the projects of the facilities or carrying out the management of subsequent works or in which it is established as a requirement of installation companies, repairers, etc., to have a expert competent to be able to be qualified and to carry out his work as such, it must be understood that a 'competent expert' is a university graduate with specific competences in the subject matter of the relevant regulation). The definition does not limit specific qualifications. With regard to the application of the Industry Act, the doctrine of the Supreme Court is applied, which establishes that the principle of suitability over exclusivity prevails. With regard to the application of the LOE for buildings, what is indicated in the law itself applies.
103	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC	Article 3. Definitions. g) Competent qualified person:	Where it says: 'Competent, qualified expert person: The expert person with a university degree with specific competences in the field covered by this Regulation.' **Proposal**: replace the definition with the following:	R. The current wording is maintained. (Matter already assessed in other submissions).

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	WAREHOUSES OF SPAIN (APPUNLE)		'Competent, qualified expert person: Competent expert or qualified expert person, who is in possession of any of the academic and professional qualifications qualified for the drafting of any of the fire safety projects in industrial establishments or for the management of works and facilities and direction of execution of works and facilities subject to this Regulation, as established in Law 38/1999, of 5 November, on Building Regulations. Also, those who holding a university degree who have the authorisation to exercise the professions indicated above. Documents from another Member State revealing that those requirements are met, in accordance with Law 17/2009 of 23 November on free access to and pursuit of service activities, will also be accepted. **Reason**: providing a precise definition to the concept of competent expert.	
104	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Preamble (referring to Article 3 Definitions)	Preamble (...) Therefore, it is necessary to adopt a new Regulation on fire safety in industrial establishments, regulating the conditions for establishing an adequate level of fire safety in industrial establishments horizontally, and applicable in any sector of industrial activity. Due to the evolution of the competent expert, both in the national and European regulatory framework, it is appropriate to add the definition of 'competent expert person' to this Regulation. Article 5 of Law 20/2013 of 9 December on guaranteeing market unity regulates: '1. The competent authorities which, in the exercise of their respective powers, establish limits on access to or pursuit of an economic activity in accordance with the provisions of Article 17 of this Law or require the fulfilment of requirements for the development of an activity, ***shall state reasons for their need to safeguard some overriding reason in the public interest among those covered by Article 3.11 of Law 17/2009***, of 23 November, on free access to and pursuit of service activities.	PA. That which is set out in Article 3 contains a definition of this figure. On the concept itself of a competent, qualified person: The current wording is maintained. (Matter already assessed in other submissions).

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			2. Any limit or requirement laid down in the preceding section must be proportionate to the overriding reason in the public interest invoked and must be such that there is no other less restrictive or distortive means for the economic activity.' That is, the competent authorities, in this case this Ministry of Industry, Trade and Tourism, may establish limits on access to an economic activity such as fire safety in industrial establishments. Provided that it motivates the need to safeguard an overriding reason in the public interest among those included in Article 3.11 of Law 17/2009, of 23 November, as it is, and we find in that regulation, public security, which is one of the main purposes contained in this legislation. Lastly, the limit imposed must be proportionate to the overriding reason in the public interest and that there is no other less restrictive or distortive means for economic activity. A limit already used, and declared proportional is that established in Law 38/1999, of 5 November, on the Building Regulations, for this same reason the figure of competent, qualified expert person must be linked to that who possesses any of the academic and professional qualifications qualified for the drafting of any of the building projects or for the management of works and direction of building works, being in any case the experts who are in possession of a university degree that has the qualification for the exercise of the regulated professions of architect, technical architect, engineer and technical engineer. In view of the above, and given that we are faced with an overriding reason in the public interest – as important as public security – a limitation must be established that meets objective and measurable criteria, which do not cause such a serious danger and consequences for society. (...)	
105	GENERAL COUNCIL OF OFFICIAL COLLEGES OF	Article 3. Definitions [...] g) competent, qualified expert person: The university-qualified expert	Article 3. Definitions [...] (g) Competent, qualified expert person: The university-qualified expert person with specific competences in the subject matter of this regulation, being considered technical	R. The current wording is maintained. (Matter already assessed in other submissions).

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	person with specific competences in the subject matter of this Regulation.	competent for this purpose, those who are in possession of any of the academic and professional qualifications qualified for the drafting of any of the building projects or for the management of works and direction of execution of building works, as established in Law 38/1999, of 5 November, on the Building Regulations. Likewise, experts who are in possession of a university degree providing the authorisation to exercise the regulated professions of architect, technical architect, engineer and technical engineer are considered competent. JUSTIFICATION Article 5 of Law 20/2013 of 9 December on guaranteeing market unity regulates: *'1. The competent authorities which, in the exercise of their respective powers, establish limits on access to or pursuit of an economic activity in accordance with the provisions of Article 17 of this Law or require the fulfilment of requirements for the development of an activity,* ***shall state reasons for their need to safeguard some overriding reason in the public interest among those covered by Article 3.11 of Law 17/2009****, of 23 November, on free access to and pursuit of service activities.* 2. Any limit or requirement laid down in the preceding section must be proportionate to the overriding reason in the public interest invoked and must be such that there is no other less restrictive or distortive means for the economic activity.' In other words, the Ministry of Industry, Trade and Tourism, may establish limits on access to the performance of fire safety activity in industrial establishments, provided that it motivates the need to safeguard an overriding reason in the public interest among those included in Article 3.11 of Law 17/2009, of 23 November, as it is, and we find in that regulation, the protection of the environment and the urban environment and the safety of people; the purposes of which are set out in this legislation. Lastly, the limit imposed must be proportionate to the over-	

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			riding reason in the public interest and that there is no other less restrictive or distortive means for economic activity. In view of the above, and in view of the fact that we have an overriding reason in the public interest, what public security is like, a limitation must be laid down in accordance with objective and measurable criteria, which do not cause such a serious danger and consequences for society and that articulate a situation of equality for all those who wish to operate as competent experts for the purposes of this Regulation.	
106	Official College of Physicists (COFIS)	Article 3. Definitions '(g) Competent, qualified expert person: The expert person with a university degree with specific competences in the field covered by this Regulation.'	The definition may be generic. It is proposed to specify: **'technical persons entitled in Engineering, Physics, Chemistry and Architecture...'** evaluating adding other degrees with competences in this regulation. **Engineering** degrees related to Industry, providing extensive knowledge of Thermodynamics and Fluid Dynamics. Bachelor/Grade in **Physics** guaranteeing extensive knowledge of Thermodynamics, Mechanics of Continuous Media (including Fluid Dynamics), and Chemistry knowledge. Bachelor/ Degree in **Chemistry** through knowledge of Formulation and Thermodynamics. **Architects** that construct these Establishments. Assess the provision of additional specific training, if deemed necessary, that enable the graduates concerned. This amendment will contribute to the greater number of appropriate qualifications being admitted in all the Autonomous Communities, favouring free competition between professionals on equal opportunities, for the greater benefit of clients and citizens.	R. The current wording is maintained. (Matter already assessed in other submissions).
107	Levante Official College of Agricultural Engineers	Article 3. *Definitions. (g)*	Page 28. Where it says: 'Competent, qualified expert person: The expert, university-qualified person with competencies specific in the subject matter of this regulation' It is proposed: 'Competent, qualified expert person: the curriculum covers the subjects covered by this Regulation, for which it certifies its qualification.'	R. The current wording is maintained. (Matter already assessed in other submissions).
108	Superior Council	RSCIEI. In Article 3. Definitions, point	It would be advisable to complete the sentence indicating	R. The current wording is maintained.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	of the Colleges of Architects of Spain	(g) on 'Competent, qualified expert person' reads as follows: 'The expert person with a university degree with specific competences in the field covered by this Regulation.'	that the competent qualified person will be in possession of any of the academic and professional qualifications qualifying for the drafting of building projects or for the management of works and direction of execution of construction works of industrial use, as established in Law 38/1999, of 5 November, on the Building Regulations.	(Matter already assessed in other submissions).
109	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Article 3. Definitions. h) Significant amendments: *(proposal for a new definition to be incorporated)*	There is no precaution in the standard. **Proposal**: incorporate the following definition into Article 3: *'(h) Significant alterations. The following shall be deemed significant alterations: extensions and renovations involving an increase in the area of more than 20% or an increase in the level of intrinsic risk for which the establishment was designed, as well as any other substantial change likely to compromise compliance with the basic safety requirements in the event of a fire for which the establishment was designed or resulting in a higher requirement for requirements as referred to in the Annexes to this Regulation.'* **Reason**: In the submissions relating to Articles 10 and 12, it is proposed to replace the indeterminate legal concept of substantive amendments with the list of cases in which this situation is limited. Similarly, the concept of 'significant alterations' should be defined and limited in Article 3. As a proposal for clarity, systematic standard and legislative technique, it is proposed to incorporate in the article for the definitions of the Regulation the significant amendment contained in Article 12(4), with the proposed diction of this concept. Article 10 refers to the concept of significant alteration with reference to Article 12(4) and general to the provisions of the regulation which should be limited to the legal definition in order to provide it with uniformity and legal certainty. It is proposed that the **surface area increase** be considered significant alteration in increments above 20 %, since it will always be considered when there is an increase in the intrinsic level of risk, without considering in this case the area. Therefore, the area increases of less than 20 % without an increase in the intrinsic level of risk do not justify their being deemed a significant alteration.	PA. A definition of significant alteration is introduced (with the same concept that was already included in the initial wording, in its corresponding article), however, the proposal of this submission is not fully reflected. It is not appropriate to make distinctions for percentages of areas.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
110	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Article 3. Definitions. (I)Project (proposed new definition to be incorporated)	There is no precaution in the standard. **Proposal**: incorporate the following definition into Article 3: *'i) Project: The project is the set of documents by which the technical requirements of the works referred to in Article 2 of the Law on Building Regulations are defined and determined. The project must technically justify the proposed solutions in accordance with the specifications required by the applicable technical regulations.* *Where the project is developed or completed by partial projects or other technical documents on specific technologies or building facilities, the necessary coordination shall be maintained between them without duplication of documentation.'* **Reason**: to provide a precise definition of the concept of a project in accordance with Article 4 of Law 38/1999 of 5 November on Building Regulations. Definition not included. Reference is made to project in the Regulation, essentially in Article 10 'Construction projects'.	R. The definition of a project appears in the LOE. In any event, and on the other hand, Chapter III already talks about the project.
111	FEDAOC	Article 4 on regulatory compatibility	what would happen in the case of a large sector, where it occurs that the total of the facilities, such as small offices or other uses of the CTE, distributed throughout the sector exceed 250 m²? Particularly in the case where a subsequent minor reform is made, adding an office post somewhere in the sector that causes the conditions of Article 4(2) to be exceeded.	C. It does not include specific proposals. With regard to the subject matter, this case is reflected in Article 2.4.h. Article 4 as a whole follows the same way of functioning as in the current regulation of 2004, adding more details where it has been deemed necessary.
112	FEDAOC	Article 4: 'these spaces, when they exceed the indicated surfaces, shall constitute a separate fire sector (...)'	Does this mean that they must have a lobby of independence to access the adjoining industrial sector? The concept of 'independent fire sector' has gone through several interpretations over time. The CTE DB-SI does not indicate what it is; in rev. 1 of the Technical Guide to Royal Decree 2267/2004, it stated that: 'independent fire sector means an independent fire sector whose delimiting building elements and passing doors comply with the fire performance requirements laid down in this Regulation'. This comment was deleted in Rev. 2. There are regulations at the local level – e.g., the Madrid IPO – where it is indicated that it is independent sectors having access directly from the outside or through the independence lobby.	C. It does not include specific proposals. On the subject matter, this matter is clear in the annexes to the RSCIEI and in the CTE DB-SI.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			Suggestion: write as follows: Article 4: 'these spaces, when they exceed the indicated surfaces, shall constitute an independent fire sector, understood as such that has access directly from the outside or through an independent lobby (...)'	
113	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	RSCIEI Article 4. Regulatory compatibility	It should be clarified whether areas of the establishment that must comply with the requirements of the DBSI are understood to be part of the establishment. Otherwise, it is difficult to understand what point 2(h) means. Perhaps it should be divided into two points.	A. Clarifications on these areas and point (h) have been added.
114	Professional Association of Fire Technicians (APTB)	Chapter 1 'General provisions", Article 4, Several uses (a), (b), (c), (d) or (f) adjacent or in the same sector: built **in excess of 250 m^2 among them.** If it includes use (g): built in excess of 100 m^2 among all of them.	If at the entrance of an industrial establishment there is an office of 240 m^2, and at the end of the industrial establishment there is another office of 20 m^2, with a large separation between them, should I sectorise the two offices? I understand that there would be no cumulative fire hazards. The office fire risk of 20 m^2 does not exist as such. What's more, if the office of 20 m^2 were the only office would not have to sectorise it, so I don't understand why the two should be sectored. Or, for example: If I have an office of 200 m^2 and an adjacent office of 200 m^2, which are sectored among them, even if they are not with respect to the industrial establishment. Should I accumulate your surfaces? Theoretically, the risk of a fire occurring in one of the offices is independent of the risk that occurs in the other. We have already consulted the Ministry of Industry once, and we were told that the risks, if they are separate, do not accumulate.	A. The wording of the has been amended to make it more proportionate.
115	FEDAOC	RSCIEI Art 4.1 Regulatory Compatibility	There are recurrent doubts on this point, as it does not make clear whether the sectors or buildings in which the CTE applies should be subject to CB inspection, when they are inside an industrial establishment. An example is an industrial plant that consists of several buildings separated from each other more than 3 m in which one of them is an office building. This building should be included in the RSCIEI	A. Clarifications have been added to the text.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			inspection in the same way as the rest, except that the requirements to be verified in the inspection are those prescribed by the CTE. The opposite would create illogical situations such as leaving out of any inspection buildings of more than 250 m^2 and less than 2,000 m^2 (which are excluded from inspection also by R.D.513/2017). Similarly, it should be clarified that the sectors or buildings in which the CTE is applicable should also be included in calculating the fire load of each of the sectors. It is proposed to add point 3 in Article 4 of regulatory compatibility, with the following: 3. The fire sectors referred to in point 2 located in buildings for industrial use shall be characterised as set out in Annex I; they shall also be included in the inspections provided for in Chapter IV, provided that they are not subject to periodic inspection in accordance with Article 22 of Royal Decree 513/2022.'	
116	IETcc	Article 4 Regulatory compatibility, point 2	Case (f) should be treated in the same way as housing, and require sectorising in any case, given its similarity in terms of risk. In case (h), if there is the possibility of several uses of the CTE, including the use as parking, it is not understood the reduction to 100 m^2 of the whole, since the parking would already be compartmentalised as LRE when the DB SI has to be met.	A. The list is amended and some things are moved from point (f) to (e). Point (h) has been changed.
117	CEPREVEN	Article 4(2)(2) 2. Where, within an industrial establishment, other subsidiary activities identified with the uses defined in the CTE DB-SI coexist with the industrial activity, the areas in which they are carried out must comply with the provisions of those regulations when they exceed the areas indicated below: a) Administrative: constructed area exceeding 250 m^2.	It is proposed incorporating the paragraph indicated in bold, referring to the complementary uses of the uses referred to in this section, such as changing rooms or canteens, about which there is currently some uncertainty, especially when they are located in the same building and even sector. *2. Where, within an industrial establishment, other subsidiary activities identified with the uses defined in the CTE DB-SI coexist with the industrial activity, the areas in which they are carried out must comply with the provisions of those regulations when they exceed the areas indicated below:*	A. The proposed text was added, with adjustments to the wording.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		b) Commercial: constructed area exceeding 250 m². c) Teacher; area exceeding 250 m². d) Public Buildings: constructed area exceeding 250 m². e) Residential Housing: always. f) Public Residential or Accommodation Areas: constructed area exceeding 250 m². p) Parking: constructed area exceeding 100 m². h) Several uses (a), (b), (c), (d) or (f) adjacent or in the same sector: built more than 250 m² These spaces, when they exceed the indicated surfaces, must include a fire sector independent of the areas with industrial use, in addition to complying with the requirements set out in the CTE DB-SI.	*a) Administrative:... (g) Parking: constructed area exceeding 100 m².* *h) Several uses (a), (b), (c), (d) or (f) adjacent or in the same sector: built more than 250 m²* ***Areas where additional uses are made of the uses referred to above, such as changing rooms or canteens, shall be deemed part of the area for industrial use unless they form part of the sector itself with the uses referred to in points (a), (b), (c), (d), (e), (f), (g) or (h) or are intended exclusively for personnel whose job is predominantly exercised in these areas, in which case the area shall be counted in those areas for the purposes of this Article.*** *These spaces, when they exceed the indicated surfaces, must include a fire sector independent of the areas with industrial use, in addition to complying with the requirements set out in the CTE DB-SI.*	
118	CEPREVEN	Article 4(2), final paragraph. These spaces, when they exceed the indicated surfaces, must constitute a fire sector independent of the areas with industrial use, in addition to complying with the requirements set out in the CTE DB-SI	It is understood that the word *sector* is being used to encompass sectors and areas, but it would be more convenient to write it explicitly indicating both words, since it can be the case of an outdoor car park to which this regulation applies because it has an area greater than 100 m^2 and should constitute an area and not a sector.	R. It makes no sense to talk about areas in this section since compatibility is only going to be with the CTE DB SI, which regulates buildings, and not open spaces.
119	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Article 4. Regulatory compatibility Point 2.	2. Where, within an industrial establishment, other subsidiary activities identified with the uses defined in the CTE DB-SI coexist with the industrial activity, the areas in which they are carried out must comply with the provisions of those regulations when they exceed the areas indicated below: (...) These spaces, when they exceed the indicated surfaces, must include a fire sector independent of the areas with industrial use, in addition to complying with the requirements set out in the CTE DB-SI. **<u>It is proposed to modify the wording of point (h), including</u>**:	R. The current text is clear and the limits that are placed are the same for all cases. The fact that a sector is larger is not encouraging to allow exceptions or relax these limits. No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			h) Several uses (a), (b), (c), (d) or (f) adjacent or in the same sector: built more than 250 m² among all of them. If it includes use (g): built in excess of 100 m² among all of them. **In the case of sectors > 10,000m² this area may be doubled provided that there are no more than 250m² adjacent or with a distance of less than 50 m between their enclosures.** **Reason:** Section (h) in large units (> 10,000m²) may be limiting in the case of control offices or small rest areas spread throughout the warehouse. It is easy for all these small spaces to add up to more than 250 m², although there are great distances between them.	
120	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Article 4. Regulatory compatibility Point 2. Final paragraph. These spaces, when exceeding the indicated surfaces, must constitute a fire sector independent of the areas with industrial use, in addition to complying with the requirements of the CTE DB-SI.	Definition of the term independent fire sector.	R. The definition of 'fire sector' is perfectly defined in Annexes I and II.
121	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Article 4. Regulatory compatibility 2. p) Parking: constructed area exceeding 100 m².	This incompatibility contradicts what is marked in the CTE, which does not mark a limit surface and, in any case, it is necessary to separate a parking from any other use.	R. It is understood that the casuistry of an industry is very different from other uses, and that the limit that is placed is adequate.
122	APICI	Article 4. *Regulatory compatibility* Point 2.	2. Where, within an industrial establishment, other subsidiary activities identified with the uses defined in the CTE DB-SI coexist with the industrial activity, the areas in which they are carried out must comply with the provisions of those regulations when they exceed the areas indicated below:	R. The current text is correct and clear enough on this matter. New changes are not appropriate. (Note that this Article as a whole has already been amended as a result of other submissions.)

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			… These spaces, when they exceed the indicated surfaces, must include a fire sector independent of the areas with industrial use, in addition to complying with the requirements set out in the CTE DB-SI. **It is proposed to modify the wording of point (h), including:** h) Several uses (a), (b), (c), (d) or (f) adjacent or in the same sector: built more than 250 m² among all of them. If it includes use (g): built in excess of 100 m² among all of them. In any event, those uses that have not been included in the previous sections will be included, where the requirements of their own Regulations will apply, if they exist, or the requirements of the Technical Building Code, in its Basic Safety Document in the event of fire (CTE DB-SI), such as Locals and Areas of Special Risk.	
123	General Secretariat for Industry and Mines, Government of Andalucía	RSCIEI, Article 4.2.	By analogy to Article 4.1 and the current RSCIEI, this section could also refer to the CTE '**or equivalent regulations**'.	R. The current text is correct and clear enough. No changes are necessary.
124	Superior Council of the Colleges of Architects of Spain	*Article 4. Regulatory compatibility* *'2. Where, within an industrial establishment, other subsidiary activities identified with the uses defined in the CTE DB-SI coexist with the industrial activity, the areas in which they are carried out must comply with the provisions of those regulations when they exceed the areas indicated below:* *(…)* *h) Several uses (a), (b), (c), (d) or (f) adjacent or in the same sector: **built** more than 250 m² among all of them. If it includes use (g): **built** in excess of 100 m² between all of them.'*	It is noted that the word surface is missing in front of the phrase: '… built in excess of…'	A. The proposed text has been added.
125	Official College of	Chapter II. Requirements to be met	Page 29. It states: *'1. The provisions of this regulation will*	C. The submission does not specify or

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	Industrial Engineers of the Valencian Community	by industrial establishments. Article 5. Compliance with the requirements	*have the condition of minimum enforceable as indicated in Article 12.5 of the Law 21/1992, of July 16, Industry. These minimums shall be deemed to have been met by one of the following ways:...'* Article 12.5 of Law 21/1992 states: ' *The Industrial Safety Regulations at the state level will be approved by the Government of the Nation, without prejudice to the fact that the Autonomous Communities, with legislative competence over industry, may introduce additional requirements on the same matters in the case of facilities located in their territory'.* **It is proposed:** Clarifying this point.	argue what it is proposing. In any event, the current text is correct and clear enough.
126	particular	Article 5. Compliance with the requirements ... 2. Industrial establishments the fire load density of which, calculated in accordance with Annex I, does not exceed 42 MJ/m² (10 Mcal/m²) are exempted from the obligation to comply with the requirements of the Regulation, provided that their constructed surface area is less than or equal to 120 m².	Multi-business buildings with an area of less than 120m² and a fire load of less than 42 MJ/m² (10 Mcal/m²) are exempt from any fire protection regulations: The DB-SI specifies in its Introduction, item 'II Scope' the exclusion of industrial establishments and areas of industrial use. Proposal: Amendment according to the first submission and: Amend **Annex I**; point 1.3 by adding a third paragraph: *Industrial buildings with more than one establishment shall comply with the fire protection conditions corresponding to the highest risk establishments expected to be found there, and at least those corresponding to low-risk establishments 1.*	PA. A text similar to the one proposed already existed in the current RSCIEI of 2004, which only applies to sites with very small fire load, limited size and including some requirements. In the case of several establishments, it apply the regulation separately for each of them. To avoid misinterpretation, a text has been added to clarify that the establishment should be compartmentalised from the adjacent ones.
127	CONAIF (National Confederation of Fitter and Fluid Associations)	**Article 5. Fulfilment of the requirements.** 2. Industrial establishments the fire load density of which, calculated in accordance with Annex I, does not exceed 42 MJ/m² (10 Mcal/m²) are exempted from the obligation to comply with the requirements of the Regulation, provided that their constructed surface area is less than or equal to 120 m². In such cases, it shall be sufficient to comply with the provisions of Article 12 on operation,	**Article 5. Fulfilment of the requirements.** *2. Industrial establishments the fire load density of which, calculated in accordance with Annex I, does not exceed 42 MJ/m² (10 Mcal/m²) are exempted from the obligation to comply with the requirements of the Regulation, provided that their constructed surface area is less than or equal to 120 m². In such cases, it shall be sufficient to comply with the provisions of Article 12 on operation, maintenance and alterations, and in the paragraphs of Annex III concerning fire extinguishers and emergency lighting.* ***In addition, a technical report will be drawn up by the qualified operator of the installation company of Fire Protection or the competent qualified expert who prepares the construction***	R. The role of the RIPCI operator is being confused. That is not its role. With regard to the report itself, what is proposed in the draft is that it is available (without having to be registered), and it is understood that this wording is the most appropriate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		maintenance and alterations, and in the paragraphs of Annex III concerning fire extinguishers and emergency lighting. In addition, there must be a technical report justifying compliance with the above, which will be available to the competent administration.	***project or permit application of the industrial establishment. This report will be registered with the competent industry body by telematic or physical means***. We understand that all facilities must be accompanied by technical documentation registered with the competent body of Industry, thus avoiding intrusive activities and enabling a better knowledge of the park of facilities in service.	
128	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Article 5(2) of the RSCIEI '2. Industrial establishments the fire load density of which, calculated in accordance with Annex I, does not exceed 42 MJ/m² (10 Mcal/m²) are exempted from the obligation to comply with the requirements of the Regulation, provided that their constructed surface area is less than or equal to 120 m². In such cases, it shall be sufficient to comply with the provisions of Article 12 on operation, maintenance and alterations, and in the paragraphs of Annex III concerning fire extinguishers and emergency lighting. In addition, there must be a technical report justifying compliance with the above mentioned, which shall be available to the competent authority.'	Where it states 'industrial establishments the density of fire load of which', replace with 'industrial establishments in which the weighted sum of the weighted and corrected fire load density of their sectors and fire areas'	PA. The has been amended to detail the weighted and corrected load. Regarding the fire sectors, it is understood that in this case, it is expected that they will always be of a single sector.
129	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	***Article 5. Compliance with the requirements*** 2. Industrial establishments the fire load density of which, calculated in accordance with Annex I, does not exceed 42 MJ/m² (10 Mcal/m²) are exempted from the obligation to comply with the requirements of the Regulation, provided that their con-	*Article 5. Compliance with the requirements* 2. Industrial establishments the fire load density of which, calculated in accordance with Annex I, does not exceed 42 MJ/m² (10 Mcal/m²) are exempted from the obligation to comply with the requirements of the Regulation, provided that their constructed surface area is less than or equal to 120 m². In such cases, it shall be sufficient to comply with the provisions of Article 12 on operation, maintenance and alterations, and in the paragraphs of Annex III concerning	A. Clarification has been added to the text.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		structed surface area is less than or equal to 120 m². In such cases, it shall be sufficient to comply with the provisions of Article 12 on operation, maintenance and alterations, and in the paragraphs of Annex III concerning fire extinguishers and emergency lighting. In addition, there must be a technical report justifying compliance with the above, which will be available to the competent administration.	fire extinguishers and emergency lighting. In addition, there must be a technical report drawn up and signed by a competent, qualified expert person to justify compliance with the above, which will be available to the competent authority.	
130	General Secretariat for Industry and Mines, Government of Andalucía	RSCIEI, Article 5.2.	We believe this section should be moved to Article 2, since it is part of the exceptions, although in this case it is partial, to the scope of the regulation. Exceptions set out in that Article.	R. It is understood that the best site for this text is in this section. Otherwise, it could be understood that if these cases are exempted from the RSICIEI, then the CTE DB-SI applies to them, which is not the intention.
131	Superior Council of the Colleges of Architects of Spain	RSCIEI. In Article 5 on 'Compliance with the requirements', in point 2, with reference to the exception of the obligation to comply with the requirements: '2. Industrial establishments the fire load density of which, calculated in accordance with Annex I, does not exceed 42 MJ/m² (10 Mcal/m²) are exempted from the obligation to comply with the requirements of the Regulation, provided that their constructed surface area is less than or equal to 120 m². In such cases, it shall be sufficient to comply with the provisions of Article 12 on operation, maintenance and alterations, and in the paragraphs of Annex III concerning fire extinguishers and emergency lighting. In addition, there must be a technical report	Such exceptions in the application of the requirements could be considered in Article 2 on the 'Scope'.	R. It is understood that the best site for this text is in this section. Otherwise, it could be understood that if these cases are exempted from the RSICIEI, then the CTE DB-SI applies to them, which is not the intention.

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		justifying compliance with the above mentioned, which shall be available to the competent authority.'		
132	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Article 6(b).** External spreading: The risk of the fire spreading outside shall be limited, both in the establishment concerned and to other establishments and buildings.	The reduction of the requirements of the A_H and not requiring the justification of its structural behaviour in the event of fire goes against the requirement of external spreading	R. These concepts are defined in Annex I and developed in II, III and IV. Article 6 is not the place to specify this matter. In any event, the Ah type is a layout modality whose requirements are at a level of demand midway between Av and B, and it is understood that these requirements are appropriate. There is no reduction in requirements, although what is done is to detail the requirements that are considered appropriate for each case.
133	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Article 6(f).** Structural fire resistance: The load-bearing structure shall maintain its fire resistance for as long as necessary for the above basic requirements to be met.	If the fire resistance of the structure is reduced without justification of its behaviour in the event of fire, the basic requirement of internal and external spreading, or the intervention and, in the case of a mezzanine, evacuation cannot be guaranteed.	R. These concepts are defined in Annex I and developed in II, III and IV. Article 6 is not the place to specify this matter. In any event, it is understood that the requirements that have been included in the Annexes are appropriate.
134	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	RSCIEI Article 6. Basic safety requirements in the event of fire	It is proposed to change the title and leave 'Fire safety requirements in industrial establishments' It is also proposed to introduce the following wording: 1. 'Industrial establishments shall be designed, constructed, maintained and used in such a way that the following safety requirements are met as basic requirements:' It is an industrial safety regulation, the Industry law mentions 'technical conditions or safety requirements', not basic requirements. It is very well drafted in coherence with the DBSI, but we must not forget that it is issued on the basis of regulations not involving the regulations on the basis of which the DBSI is issued.	R. The current text is correct. There is nothing to prevent writing this Article in this way, and it is also considered that this wording will facilitate the compatibility between RSCIEI and CTE DB-SI. In addition, by calling these 'basic demands', it can be more easily distinguished from the requirements cited elsewhere in the text.
135	ASSOCIATION OF DEVELOPERS,	Article 6. Requirements basic safety in the event of fire	Article 6. Basic safety requirements in the event of fire	R. This Article is intended to be aligned with the CTE DB-SI, where it includes the

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	OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)		**It is proposed**: delete "(d) Fire Protection Facilities' as a 'basic requirement in calculating the fire load of each of the sectors as these are defined as 'objectives to be met by the Regulation'. It would seem more logical to prioritise the 'basic requirements' resulting from the objectives of the regulation, and to indicate that 'fire protection facilities' must be designed to meet the basic requirements (objectives) in the order of priority to be established.	same listing. In addition, the current 2004 RSCIEI already included this differentiation by including these requirements in a separate annex (Annex III), as does the proposed project.
136	European Fire Sprinkler Network	Article 7. The construction and installation requirements to be met by industrial establishments in relation to their fire safety shall be determined by the layout of their buildings and open spaces, as well as by the level of intrinsic risk of their fire sectors and areas, their surfaces and the type of activity carried out on site (manufacture and other similar processes, or storage). All of this shall be assessed by carrying out a characterisation of the establishments as set out in Annex I.	There is nothing in this Article that ensures the clear need to achieve a precise, intrinsic level of risk. It should be assumed that a manufacturing fire sector is an average risk, and a low risk reduction should be justified. No certificate is required for Low Risk establishments. Article 7 should set an intrinsic risk threshold or add the last sentence. Proposal for amendment: Article 7. The construction and installation requirements to be met by industrial establishments in relation to their fire safety shall be determined by the layout of their buildings and open spaces, as well as by the level of intrinsic risk of their fire sectors and areas, their surfaces and the type of activity carried out on site (manufacture and other similar processes, or storage). All of this shall be assessed by carrying out a characterisation of the establishments as set out in Annex I. In the absence of a detailed analysis of the level of intrinsic risk, the manufacturing or similar plant and storage plant shall be deemed medium risk.	R. The current text is correct and clear enough. The calculation of the NRI is clearly explained in Annex I and, depending on what is determined there, some or other requirements will apply. Nothing else should be added to the article.
137	Official College of Industrial Engineers of the Valencian Community	Chapter II. Requirements to be met by industrial establishments. Article 7. *Characterisation*	Page 30. Where *'Construction and installation requirements...'* **It is proposed:** *'Construction, **structural requirements** and facilities...'*	R. Structural requirements are part of the building requirements, which is sufficiently clear in the regulation. No changes are necessary.
138	Official College of Industrial Engineers of the Valencian Community	Chapter II. Requirements to be met by industrial establishments. Article 8. Construction requirements and determining the necessary fire protection facilities	Page 30. Where it says '1. *Construction requirements...*' **It is proposed:** '*1. Construction and **structural** requirements...*'	R. Structural requirements are part of the building requirements, which is sufficiently clear in the regulation. No changes are necessary.

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139	AFELMA, Association of Spanish Insulating Mineral Wool Manufacturers	Article 8(3): In addition to the previous paragraphs, Annex IV sets out requirements applicable to individual cases of zones or parts of establishments which, by virtue of their characteristics, may differ partially from the characterisation of Annex I, or from the requirements of Annexes II and III, or which require specific considerations.	In line with Article 1(2) and our comments on that point, it seems clear that the idea of Annex IV is that it serves as a 'tailor box' to correct the decoupling between the constructive reality and the associated regulations, and at the very least that this RSCIEI serves to regulate, even if it is 'transitional' until the adjustment of the particular regulation that affects them. No existing risk should be avoided especially if we talk about our own security or not cause damage to third parties. Apply the 'precautionary principle'	C. The submission is a comment that does not include specific proposals. In any event, it is not the intention of Annex IV to serve as *tailor-made box;* nor be transient or similar. No changes are necessary.
140	IPUR – Association of the Rigid Polyurethane Industry	Article 8(3): In addition to the previous paragraphs, Annex IV sets out requirements applicable to individual cases of zones or parts of establishments which, by virtue of their characteristics, may differ partially from the characterisation of Annex I, or from the requirements of Annexes II and III, or which require specific considerations.	From our reading we understand that the RSCIEI would apply to you except for the differences mentioned in Annex IV.	C. The submission is a comment that does not include specific proposals. No changes are necessary.
141	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Article 9(2) of the RSCIEI '2. Construction products not covered by CE marking must comply with the provisions of this Regulation for each case, as well as with what is required in the other specific legislation that may apply to them, and must have, if the product has any impact on the safety of the establishment, the test reports, certifications or other technical documentation that is necessary to guarantee their characteristics. The economic operator responsible for placing the product on the market, as well as distrib-	Where 'the documentation where its intended use is collected, its characteristics and performance, the reference to the reports, certifications or other documentation that it possesses' replace with 'the documentation where its intended use and field of application is collected, its characteristics and the documentation proving its performance (classification report, certification, etc.), the reference to the reports or other documentation that it possesses'	R. The current paragraph is sufficiently clear. The specific documentation that applies is already detailed on a case-by-case basis in its specific legislation, or specific section, so cases may differ for each type of product, and therefore it is not necessary to specify further here.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		utors, shall provide the recipient of the product with the relevant information on the product, providing the documentation showing its intended use, its characteristics and performance, the reference to the reports, certifications or other documentation it possesses, as well as instructions and safety information for its proper installation and use.'		
142	CEPREVEN	Chapter II, Article 9(2). 2. *Construction products not covered by CE marking must comply with the provisions of this Regulation for each case, as well as with what is required in the other specific legislation that may apply to them, and must have, if the product has any impact on the safety of the establishment, the test reports, certifications or other technical documentation that is necessary to guarantee their characteristics. The economic operator responsible for placing the product on the market, as well as distributors, shall provide the recipient of the product with the relevant information on the product, providing the documentation showing its intended use, its characteristics and performance, the reference to the reports, certifications or other documentation it possesses, as well as instructions and safety information for its proper installation and use.*	It is not defined what should be understood by *impact on the security of the establishment*, which seems to be a concept very subject to interpretation.	R. The current text is clear enough. In addition, the specific legislation or specific paragraph already details what should be applied in each individual case.
143	Superior Council of the Colleges of Architects of	RSCIEI. In Article 9 on 'Requirements for construction products and fire protection facilities', point 3 is	It would be advisable that Royal Decree 513/2017 or RSCIEI's own project, among the requirements of fire protection facilities, include various aspects covered in the UNE	R. The requirements of extinguishing systems are understood to be sufficiently detailed in their specific legisla-

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	Spain	worded as follows: '3. The equipment, systems and components that make up the active fire protection facilities shall comply with the provisions of the Regulation on fire protection facilities, approved by Royal Decree 513/2017, of 22 May.'	Standards that refer to the design of the different extinguishing systems.	tion (CE marking or RIPCI, which in turn refer to UNE-EN standards). In the event that any additional qualification is necessary, it is already included in the aforementioned regulations or, where appropriate, in Annex III.
144	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Article 9. Requirements for construction products and fire protection facilities 4. For products that must have certain characteristics or minimum performance (such as a class of resistance or fire response), depending on their intended use, such information shall be provided for in the project or technical report. Subsequently, during the construction phase, it must be verified that the products used meet these characteristics and performances, as well as that they have been installed correctly. The certificate referred to in Article 11(1)(b) shall state explicitly that such checks have been carried out.	*Article 9. Requirements for construction products and fire protection facilities* 4. For products which must have certain characteristics or minimum performance (such as a class of resistance or fire response), depending on their intended use, such information shall be provided for in the technical project or technical report drawn up and signed by a qualified expert person. Subsequently, during the construction phase, it must be verified that the products used meet these characteristics and performances, as well as that they have been installed correctly. The certificate referred to in Article 11(1)(b) shall state explicitly that such checks have been carried out.	R. The requirements of the project or technical report are set out in another article. Quoting them here is not appropriate.
145	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	RSCIEI Article 10. *Construction projects*	It is suggested to change the word 'construction' to execution	A. It is changed to 'construction and implementation', which includes all cases, as was already reflected in the previous regulations.
146	Prevention Service of the Directorate-General	Article 10(1) of the RSCIEI '1. New industrial establishments, as well as those which undergo signifi-	This amendment should be in line with the amendment of the first proposed additional provision above. Where it states 'Industrial establishments of new construc-	A. The text is restructured to refer to Articles 2.2 and 12.4. There, it is explained when you apply each case.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	cant alterations under Article 12.4 or those prior to this Regulation which alter their activity, are moved, expanded or reformed as set out in the first additional provision, shall require the preparation of a project. This may be integrated into the general project required by the legislation in force for obtaining compulsory permits and authorisations, or be specific.'	tion, as well as those which undergo significant alterations according to Article 12.4 or those prior to this regulation that modify their activity, are moved, expanded or reformed as set out in the first additional provision, shall require the preparation of a project' to replace with 'The industrial establishments of new construction, as well as those undergoing significant alterations in accordance with Article 12(4), shall require the preparation of a project.'	
147	Official College of Industrial Engineers of the Valencian Community	Chapter II. Requirements to be met by industrial establishments. Article 10. Construction projects	Page 31. 1.- Where it says '*will require the development of a project*.' **It is proposed:** '*require the development of a **fire protection (FP)*** project' 2.- Where it says '*2. The project cited*' **It is proposed:** '*2. The **FP*** project cited' 3.- Where it says '*In the case of using performance design, the performance-based project must follow the methodology established in standard UNE-ISO 23932*' **It is proposed:** '*In the case of using performance design, the performance-based project shall follow the methodology established in standard UNE-ISO 23932 **and UNE-ISO 16733-1***' It should be noted that although in the 2019 Guide of the RSCIEI-2004, in the comments to Article 1(b), standard UNE ISO 23932 is invoked as a methodological guide for the performance design and to standard UNE ISO 16733-1 for establishing the calculation fire scenarios, in Article 10(3) of the draft of the RSCIEI-2022, the UNE ISO 16733-1 standard is omitted, and its reference is essential to be able to have fire scenarios with standardised, comparable and traceable criteria that allow assessing the equivalence of the performance-based designs in terms of the rules. (It should be noted that the UNE versions of 23932 and 16733 are not updated to the current ISO versions of them.)	PA. It is not deemed appropriate to further detail the name of the project. On the other hand, the reference to the proposed ISO standard has been added.
148	ASSOCIATION OF DEVELOPERS, OWNERS AND	Article 10. Construction projects And Article 12. Point 4. Operation, maintenance and alterations	Article 10 1. New industrial establishments, as well as **those which undergo significant alterations under Article 12.4** or those	R. The current wording of 'significant alteration' (moved to the definition article) is correct and precise. It is not ap-

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	USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)		prior to this Regulation which alter their activity, are moved, expanded or reformed as set out in the first additional provision, shall require the preparation of a project. This may be integrated into the general project required by the legislation in force to obtain the required permits and authorisations, or be specific. Article 12 4. If alterations are made to the establishment once the establishment has been commissioned, the documents required by Articles 10 and 11 shall be resubmitted for the party concerned, provided that such **alterations are significant**. On the other hand, it will not be necessary to submit these documents in the event that the alterations made are not significant because they do not affect compliance with the requirements of the Regulation, in which case it will be sufficient for the owner to document and justify this situation, keeping the information at the disposal of the competent authorities and the supervisory bodies carrying out the periodic inspections. For these purposes, the following shall be deemed significant alterations: extensions and renovations involving an increase in the area or an increase in the level of intrinsic risk for which the establishment was designed, as well as **any other changes that may compromise compliance with the basic safety requirements** in the event of fire for which the establishment was designed or resulting in a higher requirement of requirements as referred to in the Annexes to this Regulation. Non-significant alterations will be considered to those that do not imply any of the above (such as changes in plant distribution, machinery or location of the shelves, provided that they do not imply an increase in the level of intrinsic risk for which it was designed, nor does it compromise the fulfilment of other requirements such as evacuation, sectorisation, or any other). If fire protection facilities are a basic requirement in itself, and not a means of achieving the objectives, according to Article 12.4, **any change in the basic requirements** could be deemed significant alteration. It may therefore be possible	propriate to add quantitative values because these values may vary depending on the specific situation. Therefore, the important thing is to comply with the basic requirements, and the alterations that are made will be significant depending on whether they affect this matter. For example, if firefighting fixtures are required and a alteration is made that removes them, that is a significant alteration because it affects the basic requirements (it would not, on the other hand, if other types of changes are made, such as a repair of such equipment).

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			that the change of location of a fire hydrant can be deemed 'significant alteration' and therefore compliance with the new RSCIEI can be required. **It is proposed**: remove from the definition of 'significant alteration' the reference to the basic requirements, and include elements that are objectively quantifiable. For example: – Buildings that extend the constructed surface by more than one **20 %**, in one or more phases. – Buildings that modify the sectorisation, the composition of construction or bearing elements, or the NRI of the sectors.	
149	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Article 10. Construction projects.	Where it says: New industrial establishments, as well as those which undergo significant alterations under Article 12.4 or those prior to this Regulation which alter their activity, are moved, expanded or reformed as set out in the first additional provision, shall require the preparation of a project. This may be integrated into the general project required by the legislation in force to obtain the required permits and authorisations, or be specific. **The following text is proposed**: *1. New industrial establishments, as well as those which undergo significant alterations ~~under Article 12.4 or those prior to this Regulation which alter their activity~~, are moved, expanded or reformed as set out in the first additional provision, shall require the preparation of a project. This may be integrated into the general project required by the current legislation for obtaining of urban licenses, declarations urban planning or other qualifying titles required by the legislation on planning and urban planning, as well as mandatory authorisations, or be specific.* Reasons: 1. Refer to the definition of significant alteration to be included in Article 3, when it remains in place of listing the cases as proposed in the previous submission. 2. Delimit the possible enabling urban authorisations con-	R. Article 10 has been restructured, however, the requirement remains that where there are significant changes the provisions here should apply. Regarding the part where urban permits are cited, it is not deemed necessary to go into more detail, since the text is clear as it is written.

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			tained in the regional legislation on spatial planning and urban planning, whose competence is exclusive in accordance with Article 148.1.3 of the Constitution.	
150	Civil Protection Service, Fire Prevention and Extinction, Barcelona City Council	Article 10(1) of the RSCIEI '1. New industrial establishments, as well as those which undergo significant alterations under Article 12.4 or those prior to this Regulation which alter their activity, are moved, expanded or reformed as set out in the first additional provision, shall require the preparation of a project. This may be integrated into the general project required by the legislation in force for obtaining compulsory permits and authorisations, or be specific.'	This amendment should be in line with the amendment of the first proposed additional provision above. Where it states 'Industrial establishments of new construction, as well as those which undergo significant alterations according to Article 12.4 or those prior to this regulation that modify their activity, are moved, expanded or reformed as set out in the first additional provision, shall require the preparation of a project' to replace with 'The industrial establishments of new construction, as well as those undergoing significant alterations in accordance with Article 12(4), shall require the preparation of a project.'	A. The text is restructured to refer to Articles 2.2 and 12.4. There, it is explained when you apply each case.
151	Superior Council of the Colleges of Architects of Spain	RSCIEI. In Article 10.1 on 'Construction projects', stating the following: '1. New industrial establishments, as well as those which undergo significant alterations under Article 12.4 or those prior to this Regulation which alter their activity, are moved, expanded or reformed as set out in the first additional provision, shall require the preparation of a project. This may be integrated into the general project required by the legislation in force for obtaining compulsory permits and authorisations, or be specific.'	Explain the following aspects: 1. Whether the activity's change of ownership will require a project. 2. In the preparation of the project, clarify the difference between 'general project required by current legislation' or 'specific project'.	PA. Part of Article 10.1 has been rewritten to make it clearer. In addition, note that a text on ownership has been included in Article 2.2.
152	Superior Council of the Colleges of Architects of Spain	RSCIEI. In point 1 of Article 10 on 'Construction projects', point 2 does not specify beyond the competent, qualified expert person: '2. The draft shall be drawn up and signed by a qualified expert person and shall	It should be completed as follows: '2. The aforementioned project will be drafted and signed by a qualified expert person in possession of any of the academic and professional qualifications qualified for the drafting of building projects or for the management of works and direction of execution of construction works of industrial use, as established in Law	R. The current wording is sufficiently clear in this respect. No need to make changes.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		contain the necessary information and documentation to justify compliance with this Regulation. This content shall include the information requested in Article 9(4), as well as the provisions of Article 19(1) of the Fire Protection Facilities Regulation, relevant to the equipment and systems to which it applies.'	38/1999, of 5 November, on the Building Regulations. It must contain the justification of all the current regulations applicable to it and the information and documentation necessary to justify compliance with this Regulation. This content shall include the information requested in Article 9(4), as well as the provisions of Article 19(1) of the Fire Protection Facilities Regulation, in respect of equipment and systems to which it applies.'	
153	Superior Council of the Colleges of Architects of Spain	RSCIEI. Article 11 on 'Commissioning' specifies the documents necessary for the registration of industrial establishments. In section (a) he mentions the project and the technical report: '(a) The project or technical report, containing the content referred to in Article 10'	Article 10 referred to in section (a) does not set out the content of the draft or the technical report.	PA. The text of Article 10(2) is amended to further clarify the content of the draft. Concerning the report, this is cited in Article 10.4 and 11.
154	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	***Article 10. Construction projects*** [...] 2. The draft shall be drawn up and signed by a qualified expert person and shall contain the necessary information and documentation to justify compliance with this Regulation. This content shall include the information requested in Article 9(4), as well as the provisions of Article 19(1) of the Fire Protection Facilities Regulation, relevant to the equipment and systems to which it applies.	***Article 10. Construction projects*** [...] 2. The aforementioned project shall be drafted and signed by a qualified expert person who is in possession of the academic and professional qualifications qualified for the drafting of projects or management of works and direction of execution of building works, as established in Law 38/1999, of 5 November, on the Building Regulations, and must contain the necessary information and documentation to justify compliance with these regulations. This content shall include the information requested in Article 9(4), as well as the provisions of Article 19(1) of the Fire Protection Facilities Regulation, relevant to the equipment and systems to which it applies. JUSTIFICATION Article 10 of the draft Royal Decree (RSCIEI) establishes that technical project will be required for industrial establishments of '*new construction, as well as those that undergo significant alterations according to Article 12.4 or those prior to this regulation that modify their activity, are moved, expanded or reformed as set out in the first additional provi-*	R. The current wording is clear enough. No need to make changes.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			sion'. It is deemed that the RSCIEI is a regulatory standard that must respect the regulatory hierarchy and, in this sense, the actions provided for in Article 10 of the RSCIEI project fall within the scope of Law 38/1999 of 5 November on Building Regulations (LOE). RSCIEI must therefore be consistent and respect the reserves of activities foreseen in the LOE for project executors, construction managers and project execution managers. In this sense, the RSCIEI project identifies the professional as *'a competent, qualified expert person'* this being a much broader concept than that foreseen by the LOE that establishes a series of reserves of activities for these construction projects for industrial use. Consequently, our corporation considers that the RSCIEI should establish that the technical projects required in the framework of the actions of Article 10 of the RSCIEI project should be drafted and signed by *'competent, qualified expert person who is in possession of the academic and professional qualifications qualified for the drafting of projects or direction of works and direction of execution of building works, as established in Law 38/1999, of 5 November, on the planning of the building;"*.	
155	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Article 10(3).** ... Together with the project, an independent third-party report must be attached, which positively validates the effectiveness and adequacy of the technical solutions, issued by a supervisory body authorised for these tasks in accordance with Royal Decree 2200/1995 of 28 December approving the Infrastructure Regulation for Quality and Industrial Safety	The RD should mention the criteria for a CB to be authorised. At present there are five CBs that have an accreditation for 'Equivalent Technical Security Solutions (Provisional Design Validation) according to Article 1.b of Royal Decree 2267/2004 and the Technical Implementation Guide'. Would you like to update that accreditation to the new regulation? Or will specific authorisation be made as in the RIPCI? A document with the basic principles of performance design in the scope of the RSCIEI (objectives, requirements, analysis criteria and minimum checks to be carried out according to the deviations of the project to the requirements) should be published. The CB should be authorised/accredited only to carry out proper initial and periodic inspections (Articles 11c and 13e) of establishments that have been the subject of financial de-	R. The current text already makes clear the criteria for empowerment. Bodies will have to be accredited and then empowered for specific tasks (either to carry out inspections, or to validate equivalent solutions, etc.). Regarding the proposal not to request a validation report of a CB in the project, this is not deemed appropriate and this report is essential for requesting it, so that the correct application of this type of particular solutions is validated by the third party.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			sign to verify that the assumptions and limitations imposed by the performance design are still respected. It is proposed to remove the mandatory CB validation report at the time of the project. If a third-party report is requested, the safety objectives, the basic principles of performance design and the conditions to be met by the bodies conducting the review should be clearly defined.	The current text is deemed appropriate.
156	CEPREVEN	Text of the Regulation, Chapter III, Article 10(3)(1).	Provide legal support for the possibility for specialised and independent inspection bodies that are not a supervisory body to carry out the assessment report of a financial project. Add the text in **red**: *For particular cases where it is chosen to use equivalent safety techniques or performance design, as referred to in Article 5(1)(b), the project must document the use of these techniques, as well as that the solutions adopted meet the basic requirements of Article 6.1, and that the level of safety obtained is at least equivalent to that obtained by the application of the requirements indicated in this Regulation. Together with the project, an independent third-party report must be attached, which positively validates the effectiveness and adequacy of the technical solutions, issued by a supervisory body authorised for these tasks in accordance with Royal Decree 2200/1995, of 28 December, approving the Infrastructure Regulation for Quality and Industrial Safety, or issued by a competent optional expert according to Law 21/1992, of 16 July, on Industry, on behalf of an independent entity in relation to the project to be evaluated and expert in performance design, accredited by ENAC as an inspection entity Type C according to UNE-EN 17020.* Justification: The methodology for carrying out projects based on a performance design includes a section dedicated to third-party monitoring or peer review. The SFPE (Association of Fire Protection Engineers) clearly defines what the peer-review process is: Peer review is the evaluation of the conceptual and technical consistency of a design by qualified individuals, to judge the validity of a design, or to assess the possibility of a design to achieve the intended objectives.	R. It is understood that the most appropriate thing is that the entities carrying out these tasks are supervisory bodies. Specialised persons or entities wishing to carry out these activities may be enabled as supervisory bodies for this purpose. The current text is deemed appropriate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			Regarding the qualification of the reviewing entity, they indicate that 'you should have the necessary knowledge in fire protection engineering or experience in fire science to understand and evaluate the project. This knowledge and experience must be demonstrable.' Once the objectives and criteria of effectiveness have been defined, the selection of fire scenarios, the scenarios and critical design characteristics, and the methods of evaluation, the project executor must present a summary considering all these aspects. This summary called *Fire Engineering Brief*, or Preliminary Report according to UNE-ISO 23932, should be discussed and agreed between all parties involved, including the reviewer; indeed, UNE-ISO 23932 quoted in the new RSCIEI states: '*The preliminary report should receive the agreement of the stakeholders/affected parties, especially the competent authorities when dealing with regulatory objectives'*. If the reviewer is a Supervisory Body acting on behalf of the competent authority, the standard would be asking for the agreement of the Supervisory Body on a design that has not yet been verified, and therefore, it would be requesting an action incompatible with its nature, which is only inspection and verification. On the other hand, the inspection and evaluation activity of the Supervisory Bodies in the field of industrial safety as it has been carried out so far has been based on the verification of compliance with specific technical requirements set out in Regulations and Standards. However, the approach of a financial project is not subject to specific design requirements, beyond the application of a commonly accepted methodology (UNE-ISO 23932, SFPE, etc.) and the guarantees that can be requested from the calculation software (UNE-ISO 16730-1 or equivalent). Therefore, the evaluation of such a project, in order to verify whether the basic requirements of Article 6.1 are met and whether a level of safety equivalent to that obtained through the application of the requirements of the regulation is achieved, implies extensive knowledge of fire protection engineering in different disciplines: fire physics and chemistry, heat transmission	

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			mechanisms, fluid mechanics, construction, human behaviour in case of emergency, installation design. As drafted in the new Regulation, the entities with more experience and specialisation in this field, which are not supervisory bodies or in many cases have the possibility to be, will not be able to contribute with their knowledge to the evaluation of these projects that are increasingly abundant. According to Law 21/1992 on Industry, Article 13, there are several means by which compliance with the regulatory requirements in the field of industrial safety can be proved, always in accordance with what is indicated in the corresponding Regulation. One of the means is that referred to in point (b) 'certification or certificate of supervisory body', but point (b) also empowers an authorised installer or curator, or a competent optional expert, to issue such a certificate or report. It would therefore be sufficient for the new RSCIEI to introduce the possibility that the validation report could be issued by a competent expert on behalf of a specialised and independent entity in relation to the project to be evaluated. For s greater guarantee as to the experience, specialisation, and independence of that entity in relation to the project to be evaluated, the Regulation could require accreditation by ENAC. Accreditation as a Type C inspection body by ENAC would safeguard the independent requirements of the inspection body in relation to the inspected item (provisional project).	
157	Efectis France SASU	Article 10(3): Together with the project, an independent third-party report must be attached, which positively validates the effectiveness and adequacy of the technical solutions, issued by a supervisory body authorised for these tasks in accordance with Royal Decree 2200/1995 of 28 December approving the Infrastructure Regulation for Quality and Industrial Safety	The RD should mention the criteria for body to authorise itself. At present there are five CBs that have an accreditation for 'Equivalent Technical Security Solutions (Provisional Design Validation) according to Article 1.b of Royal Decree 2267/2004 and the Technical Implementation Guide'. Would you like to update that accreditation to the new regulation? Or will specific authorisation be made as in the RIPCI? The current accreditation of the Supervisory Bodies is part of the inspection activities *UNE-EN ISO/IEC 17020:2012 Conformity Assessment. Requirements for the operation of various types of bodies performing the inspection*. The Regula-	R. The current text makes the criteria clear. Bodies will have to be accredited and then empowered for specific tasks (either to carry out inspections, or to validate equivalent solutions, etc.). Regarding the proposal not to request a validation report of a CB in the project, this is not deemed appropriate and this report is essential for requesting it, so that the correct application of this type of particular solutions is validated by the

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			tion does not define the appropriate framework for developing a performance fire project (such as lack of safety objectives for each type of building, basic requirements, and specific analysis criteria). There is also no standard against which to be accredited that defines how to do these projects or validations. The current accreditation of ENAC is deemed to lack any credibility as it is based on the quality documentation of each Supervisory Body and ENAC documents: *– RDE – 17 Supervisory Bodies. Specific accreditation requirements* *– CGA-ENAC-OCI Installation Supervisory Bodies: technical competence requirements* *– NT – 87 Supervisory Bodies for Industrial Products Regulations and Notified Bodies for Industrial Directives: Accreditation of the activity 'alternative technical solutions' and similar.* None of these three documents contains the technical competence requirements necessary for an inspector to validate performance design solutions, such as those performed when applying fire safety engineering methods under RSCIEI. The CGA-ENAC-OCI defines the technical competence requirements for carrying out periodic regulatory inspections, and is clearly geared towards this type of activity, not the revision of a financial project. Nor does standard UNE-EN ISO/IEC 17020:2012 seem the most appropriate framework to frame this activity. The *UNE-EN ISO/IEC 17029:2019 Conformity assessment. General principles and requirements for validation and verification bodies* could be the most appropriate framework for these accreditations. In its introduction, the validation and verification of security engineering projects is clearly mentioned as examples of applications. In its scope, this standard includes in its scope that it may serve as the basis for third-party review activities, such as those intended to be required by the RSCIEI in this Article. Inspections are part of another conformity validation process.	third party. In short, the current text is deemed appropriate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			It is understood that what is sought with this Article is a peer review. To be able to validate a performance design you must be able to create a performance design, and an CB is unable to do so. How can it be ensured that an inspector is trained to validate a project if he or she has probably never done one, and the framework in which the accreditations have been given does not seem to be the right one? If you're not really an expert on the subject, what good is that validation? Of all the inspectors who have validated our studies in these two years, we do not know that any of us have experience of having carried out performance projects. This was not the case when we were validated by the engineering studies of organisations with extensive experience in the subject. If this validation does not contribute anything to safety, it is being made to pay the industry a cost and time without a compelling reason. The Ministry should publish a document with the basic principles of performance design in the scope of the RSCIEI (objectives, requirements, analysis criteria and minimum checks to be carried out based on the project's deviations from the requirements). And ENAC, before starting to make accreditations on this subject, should select the appropriate standard, and define minimum requirements of technical competence and have competent auditors in the field. Or else, the Ministry of Industry should define them in the RSCIEI, as it does in the RIPCI and make the corresponding authorisations. What does make sense is that the current accreditation of CBs serves to ensure that initial inspections (arts. 11c and 13e) of establishments that were the subject of financial design are carried out correctly, in order to verify that the assumptions and limitations imposed by the performance design are still respected. This is covered by the standard governing inspection activities and the CGA-ENAC-OCI.	

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			It is proposed to remove the mandatory CB validation report at the time of the project. If a third-party report is requested, the safety objectives, the basic principles of performance design and the conditions to be met by the bodies conducting the review must be clearly defined.	
158	General Secretariat for Industry and Mines, Government of Andalucía	RSCIEI, Article 10(3).	The phrase 'These techniques may be used in particular cases where circumstances exist that justify it' is very vague, so it should be avoided, especially when there is no previous intervention by the administration. Their wording should therefore be deleted or revised, in order to establish clearer criteria as to when the use of such techniques is permissible.	R. The text is sufficiently clear. It is intended that this route can be used in all cases where the interested party so wishes and justifies it. In such cases, the text sets out the procedure to be applied to ensure that the solutions used are appropriate, so the paragraph as a whole is sufficiently clear about when and how this route can be used.
159	General Secretariat for Industry and Mines, Government of Andalucía	RSCIEI, Article 10(3).	Bearing in mind that, unlike other industrial safety regulations, the fact of being able to replace the project by technical report in the established cases does not have any practical effect as drafted, we believe this distinction is meaningless, and we propose its elimination.	R. The report does differ from the draft, as can be seen in Article 11.1.b
160	KREAN S.COOP	CHAPTER III Article 10. Construction projects In the case of using equivalent safety techniques, the technical solutions adopted must be justified based on standards or design guides of recognised prestige, this being detailed in the project.	Which design guides?	C. The current text is sufficiently clear, and is in line with what the previous regulations of 2004. The text leaves some freedom under the responsibility of the project executor, the body carrying out the validation and, where appropriate, under the supervision of the authority, there is also the possibility of drawing up guides with clarifications in case of doubts. No changes are necessary.
161	Superior Council of the Colleges of Architects of Spain	RSCIEI. In point 3 of Article 10 on 'Construction projects', for particular cases where it is chosen to use equivalent safety techniques or performance design, it is mentioned several times that the technical solutions adopted justified on the basis of standards or design guidelines of recognised prestige.	It should be clarified what these standards or design guides are, and when or which are considered to be of recognised prestige.	C. The current text is sufficiently clear, and is in line with what the previous regulations of 2004. The text leaves some freedom under the responsibility of the project executor, the body carrying out the validation and, where appropriate, under the supervision of the authority, there is also the possibility of drawing up guides with clarifications in case of

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				doubts. No changes are necessary.
162	Directorate of Strategic Projects and Industrial Administration, Basque Government	Article 10. Construction projects 4. The project may be replaced by a technical report signed by a qualified expert person if the industrial establishments fulfil the following three conditions: Their constructed surface area is less than 300 m², all fire sectors or fire areas are of low intrinsic risk and do not apply to them as referred to in Article 10(3).	Proposal: *4. The project may be replaced by a technical report signed by a qualified expert person if the industrial establishments fulfil the following three conditions: Their constructed surface area is less than **400 m²**, that all fire sectors or fire areas are of low intrinsic risk and do not apply to them as referred to in Article 10(3).* Justification: A large number of establishments that have legalisation issues are vehicle repair shops, which in many cases have an area between 300 and 400 m², which would facilitate their processing.	R. It is understood that increasing this area will not represent major changes as regards the situation set out in the submission. The current surface area that is set as a limit is deemed appropriate and it is not appropriate to change it.
163	CONAIF (National Confederation of Fitter and Fluid Associations)	**Article 10. Construction projects.** 4. The project may be replaced by a technical report signed by a qualified expert person if the industrial establishments fulfil the following three conditions: Their constructed surface area is less than 300 m², all fire sectors or fire areas are of low intrinsic risk and do not apply to them as referred to in Article 10(3).	**Article 10. Construction projects.** 4. The project may be replaced with a technical report signed ***by qualified FP operator of the installation company*** running the installation if the industrial establishments meet the following three conditions: Their constructed surface area is less than 300 m², all fire sectors or fire areas are of low intrinsic risk and do not apply to them as referred to in Article 10(3). From CONAIF, we understand that qualified FP operators of the installation companies that run FP facilities of industrial establishments that do not require a project can execute the technical documentation of that installation, similar to what happens with other Industrial Safety Regulations.	R. It is not the task of the RIPCI operators to carry out such documents. They are different regulations that regulate different things.
164	CEPREVEN	Chapter III, Article 10(4) *The project may be replaced by a technical report signed by a competent expert person if the establishments fulfil the following three conditions: Their constructed surface area is less than 300 m², all fire sectors or fire areas are of low intrinsic risk and do not apply to them as referred to in Article 10(3).*	At no time is it defined what content this technical report has to have and, therefore, the advantages of having this report regarding a project are unknown.	R. With regard to the report, it is mentioned in Articles 10.4 and 11, where some particularities regarding the project are detailed in the latter.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
165	Superior Council of the Colleges of Architects of Spain	RSCIEI. For the exception referred to in Article 10.4 on 'Construction Project' worded as follows: 'The project may be replaced by a technical report signed by a competent, qualified expert person if the industrial establishments comply with the following three conditions: Their constructed surface area is less than 300 m², all fire sectors or fire areas are of low intrinsic risk and do not apply to them as referred to in Article 10(3).'	Point 4 should clarify several aspects: 1. Which parts consists of what is known as the technical report. 2. That the expert person competent for the drafting of the technical report will be in possession of any of the academic and professional qualifications authorised for the drafting of building projects or for the management of works and direction of execution of construction works of industrial use, as established in Law 38/1999, of 5 November, on the Building Regulations.	R. With regard to the report, it is mentioned in Articles 10.4 and 11, where some particularities regarding the project are detailed in the latter. With regard to the competent, qualified person, this matter is already dealt with in its corresponding places, and it is not appropriate to elaborate further here.
166	FEDAOC	Article 11. Commissioning	We believe it necessary to establish initial inspection in all cases without surface restriction at least for medium and high level. (Most industries are on industrial estates with a smaller area than indicated and the risk with the adjoining area is considerable if passive measures have not been implemented, for example).	R. The requirement of initial inspections is required only for establishments of a certain size and load of fire. It has been decided not to ask all establishments so that it does not place an excessive burden on small establishments.
167	particular	***Article 11 of the RSCIEI.*** *Commissioning. 1. For the commissioning of the industrial establishments referred to in the previous article, the presentation is required...* *c) For establishments whose constructed area of their sectors and fire areas of medium and high intrinsic risk level totals a total of 1,000m² or more, or, for those to which Article 10(3) applies, an initial inspection report, issued by a supervisory body authorised for such tasks in accordance with Royal Decree 2200/1995, of 28 December, must be submitted, reflecting that the establishment is in conformity with the project and with the provisions of these regulations.*	*Replace the whole of* ***section (c)*** *by:* *c) An initial inspection report, issued by a supervisory body authorised for these tasks in accordance with Royal Decree 2200/1995, of 28 December, must be submitted, showing that the establishment is in conformity with the project and with the provisions of these regulations.* *(without exceptions by risk level or areas of sectors or establishment)*	R. The proposal is not justified. In any event, the requirement of initial inspections is required only for establishments of a certain size and load of fire. It has been decided not to ask all establishments so that it does not place an excessive burden on small establishments.
168	FEDAOC	RSCIEI Article11.1.c (commissioning)	It is a mistake to consider initial inspections only for certain	R. The requirement of initial inspections

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			commissioning situations, since a low-risk establishment acquires that name as a result of its surface area, and the actual risk is the same as a high or medium risk. The obligation to carry out initial inspections is a success of this regulation that should be considered an investment, since it avoids problems and expenses subsequent to the operator, and so it should be extended to all establishments.	is required only for establishments of a certain size and load of fire. It has been decided not to ask all establishments so that it does not place an excessive burden on small establishments.
169	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Article 11c, page 33** 'c) For establishments whose constructed area of their sectors and fire areas of medium and high intrinsic risk level totals a total of 1,000 m^2 or more, or, for those to whom Article 10(3) applies, an initial inspection report, issued by a supervisory body authorised for those tasks in accordance with Royal Decree 2200/1995 of 28 December, must be submitted, reflecting that the establishment is in conformity with the project and with the provisions of this Regulation.'	In autonomous communities such as Catalonia, there are inspections prior to establishments opening (Fire Testing Acts). In order to save time and costs for the companies inspected, there should be coordination between the different inspection agents to carry out these inspections in a joint or coordinated manner. **PROPOSAL:** c) For establishments whose constructed area of their sectors and fire areas of medium and high intrinsic risk level totals a total of 1,000m^2 or more, or, for those to which Article 10(3) applies, an initial inspection report, issued by a supervisory body authorised for such tasks in accordance with Royal Decree 2200/1995, of 28 December, must be submitted, reflecting that the establishment is in conformity with the project and with the provisions of these regulations. In the event that, in an autonomous community, certain type of initial inspection is already foreseen in the establishment, the owner of the activity may request coordination between the inspection agents or bodies.	R. The regional regulation will have to adapt or clarify what applies in your specific case. What can be expected is that if the Autonomous Community had previously had an initial inspection, this will be integrated and is the same as is now mentioned in Article 11.
170	Directorate of Strategic Projects and Industrial Administration, Basque Government	Article 11. *Commissioning* 1. For commissioning the industrial establishments referred to in the previous article, the submission by means of a communication to the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla, of the following documents for registration... d) Lastly, ...	Proposal: At the end of paragraph, add *The commissioning of the industrial establishments referred to in this article may also be carried out by processing the responsible declaration before the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla, in which this procedure is implemented. In this case, it will not be necessary to submit the documentation mentioned above, but it will be sufficient to have the same at the disposal of the Competent Administration.*	A. The proposed text has been added.

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			Justification: There are several Autonomous Communities that already have the Statement of Compliance as a usual way of processing for the commissioning of the different industrial safety regulations. With the Statement of Compliance procedure it is not necessary to submit any documentation, at least in our Community.	
171	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	RSCIEI Article 11. Commissioning	Where it says: 'd) Lastly, the documentation referred to in Article 20 of the Fire Protection Facilities Regulation, approved by Royal Decree 513/2017, of 22 May shall be included' it is deemed to be said *'d) Lastly, the documentation referred to in Article 20 of the Fire Protection Facilities Regulation, approved by Royal Decree 513/2017, of May 22, will be included, with the exception of municipal hydrants that do not require any justification'* It should be better clarified in this article what treatment is given to municipal hydrants in the commissioning, and whether the construction manager should be held responsible in any way for the execution of them.	R. It is deemed that this clarification is not necessary for the following reasons: The text proposed in the RIPCI already clarifies this; and in addition, municipal hydrants accepted for use are not part of the establishment, so the only thing that must be justified is their existence and availability.
172	Subdirectorate-General for Industry, Government of Valencia	Article 11. Commissioning. c) For establishments whose constructed area of their sectors and fire areas of medium and high intrinsic risk level totals a total of 1,000m² or more, or, for those to which Article 10(3) applies, an initial inspection report, issued by a supervisory body authorised for such tasks in accordance with Royal Decree 2200/1995, of 28 December, must be submitted, reflecting that the establishment is in conformity with the project and with the provisions of these regulations.	We believe that the obligation of initial inspection should be extended to all establishments of medium and high intrinsic risk, regardless of the area. It is proposed the following text: *c) For establishments with a medium and high intrinsic risk level, or for those to which Article 10(3) applies, an initial inspection report, issued by a supervisory body authorised for such tasks in accordance with Royal Decree 2200/1995, of 28 December, must be submitted, showing that the establishment is in conformity with the project and with the provisions of these regulations.*	R. The requirement of initial inspections is required only for establishments of a certain size and load of fire. It has been decided not to ask all establishments so that it does not place an excessive burden on small establishments.
173	CONAIF (National Confederation of	**Article 11. Commissioning.** b) A certificate issued by a compe-	**Article 11. Commissioning.** b) An ***installation certificate*** issued by ***the qualified opera-***	R. It is not the task of the RIPCI operators to carry out such documents. They

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	Fitter and Fluid Associations)	tent, qualified expert person showing the suitability of the facilities to the project (or technical report) and compliance with the relevant technical conditions and regulatory requirements. This certificate must show the number of fire sectors and areas, the intrinsic risk of each of them, state that the checks referred to in Article 9.4 have been carried out and indicate, where appropriate, whether equivalent safety techniques or performance design were used. Where the project can be replaced by a technical report in accordance with Article 10(4), the certificate and the technical report may be put together in the same document.	***tor of the FP*** installation company or qualified expert, showing the suitability of the facilities to the project (or technical report) and compliance with the relevant technical conditions and regulatory requirements. This certificate must show the number of fire sectors and areas, the intrinsic risk of each of them, state that the checks referred to in Article 9.4 have been carried out and indicate, where appropriate, whether equivalent safety techniques or performance design were used. Where the project can be replaced by a technical report in accordance with Article 10(4), the certificate and the technical report may be put together in the same document. From CONAIF, we understand that in a similar way to other industrial safety regulations, such as RSIF, the installation certificate must be able to be drawn up and signed by the qualified operator of the FP-enabled installation company that executes the FP facilities of the industrial establishment.	are different regulations that regulate different things.
174	Official College of Industrial Engineers of the Valencian Community	Article 11. Commissioning	Page 32, point 11(1)(a) Where it says '*The project or technical report*' **It is proposed:** '***The FP project or technical report***'.	R. The current text is correct. No changes are necessary.
175	SG for Industry, Energy and Mines. Murcia	Article 11. Commissioning, section 1, of Chapter III, in the following text: 1. For the commissioning of the industrial establishments referred to in the previous article, the following documents for registration are required by means of a communication to the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla: ...	Extending with the following paragraph is proposed: **However, the autonomous community may replace this communication with an Statement of Compliance attesting to possession of all the required documentation.** Ending up as follows: 1. For the commissioning of the industrial establishments referred to in the previous article, the following documents for registration are required by means of a communication to the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla: a) The project or technical report, with the content set out in Article 10. b) A certificate issued by a competent, qualified expert per-	A. The possibility of making it by Statement of Compliance has been added when established by the competent body.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			son showing the suitability of the facilities to the project (or technical report) and compliance with the relevant technical conditions and regulatory requirements. This certificate must show the number of fire sectors and areas, the intrinsic risk of each of them, state that the checks referred to in Article 9.4 have been carried out and indicate, where appropriate, whether equivalent safety techniques or performance design were used. Where the project can be replaced by a technical report in accordance with Article 10(4), the certificate and the technical report may be put together in the same document. c) For establishments whose constructed area of their sectors and fire areas of medium and high intrinsic risk level totals a total of 1,000m² or more, or, for those to which Article 10(3) applies, an initial inspection report, issued by a supervisory body authorised for such tasks in accordance with Royal Decree 2200/1995, of 28 December, must be submitted, reflecting that the establishment is in conformity with the project and with the provisions of these regulations. d) Lastly, the documentation referred to in Article 20 of the Fire Protection Facilities Regulation, approved by Royal Decree 513/2017, of May 22, will be included. However, the autonomous community may replace this communication with a submission of compliance attesting to possession of all the required documentation.	
176	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Article 11. Commissioning.	Where it says: 1. For the commissioning of the industrial establishments referred to in the previous article, the following documents for registration are required by means of a communication to the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla: (...) **It is proposed**: 1. For the commissioning of the industrial establishments referred to in the previous article, the presentation by means of a communication in the terms of Article 69 of Law 39/2015, on Procedure Common Administrative, or standard replacing it, before the competent industry	R. There is no need to make this kind of clarification. The legislation that applies to communications is clear enough.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			body of the corresponding Autonomous Community or the cities of Ceuta and Melilla, of the following documents for registration: (...) Reason: To limit the legal term 'communication' with reference to Law 39/2015, of 1 October, on the Common Administrative Procedure of Public Administrations. Where appropriate, this reference may be avoided by including the term communication between the definitions in Article 3 of the Regulation.	
177	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	***Article 11. Commissioning*** 1. For the commissioning of the industrial establishments referred to in the previous article, the following documents for registration are required by means of a communication to the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla: a) The project or technical report, with the content set out in Article 10. b) A certificate issued by a competent, qualified expert person showing the suitability of the facilities to the project (or technical report) and compliance with the relevant technical conditions and regulatory requirements.	***Article 11. Commissioning*** *1. For commissioning...* *b) A certificate issued by a competent, qualified expert person who is in possession of the academic and professional qualifications qualified for the drafting of projects or direction of works and direction of execution of building works, as established in Law 38/1999, of 5 November, on Building Regulations, which shows the adequacy of the facilities to the project (or technical report) and compliance with the technical conditions and regulatory requirements that apply.* JUSTIFICATION Consistent with the submission concerning the technicians competent in construction projects (Article 10), the certificate required in Article 11(1)(b) should also be signed by *'a qualified expert person who holds the academic and professional qualifications qualified for the drafting of projects or management of works and direction of execution of building works, as established in Law 38/1999, of 5 November, on Building Planning'*.	R. The current text is clear enough. No need to make changes.
178	KREAN S.COOP	CHAPTER III Article 11. Commissioning Section (c) which states 'for those to whom Article 10(3) applies, an initial inspection report, shall be submitted by a supervisory body authorised for such tasks...'	Does this body have to be different from the one that has made the approval by third parties? Is it the same to whom the application has been made pursuant to Article 10(3)?	C. The submission is a comment that does not include specific proposals. In any event, the body of Article 10(3) is only for particular (exceptional) cases where it is opted for the route of equivalent solutions or performance design. The tasks to be performed are different (although nothing prevents them from

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
				being done by the same body if this meets all the requirements)
179	Superior Council of the Colleges of Architects of Spain	RSCIEI. Article 11 on 'Commissioning' in Section (b) refers again to the issuance of a certificate issued by a competent, qualified expert person.	This section (b) should be completed by indicating that the competent expert person will be in possession of any of the academic and professional qualifications for the drafting of building projects or for the management of works and direction of execution of construction works for industrial use, as established in Law 38/1999, of 5 November, on the Building Regulations.	R. The current text is clear enough. No need to make changes.
180	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Article 11.2 'the owner must keep a copy of the aforementioned documentation and incorporate it in the Building Book, as set out in the legislation in force'.	Law 38/1999, of 5 November, on Building Regulations, establishes the obligation to make the Building Book to be delivered to the end users of the building, regardless of its sole or main use (Article 7, at the end). Most of the Autonomous Communities only regulate the Housing Building Book, with the exception of the Autonomous Community of Madrid which regulates the Building Book in a cross-disciplinary way for all uses of buildings in Law 2/1999, of 17 March, on measures for the quality of the building. Our corporation considers that the specific regulatory lack of the registration obligation, structure and content of the Book of the construction for industrial use should be resolved. The main submission to defend this postulate is based on the intensity of use of these buildings, the presence of an intrinsic risk of the activities carried out and of course, the coexistence on a regular basis, of a large number of facilities governed by various regulatory areas that, although they have their own registers, make it essential a framework document that allows to obtain a global vision to the different actors that may have to intervene: owners, operators, installers, maintainers-conservatives, administration, etc.	R. While the content of the comment is of interest, it is deemed that for the purposes of Article 11 the current text is correct and sufficient, and it is not for this regulation to further develop this point.
181	CEPREVEN	Article 12(1) The owners of industrial establishments shall be responsible for ensuring these are used and maintained in the appropriate conditions, so that they can be met at all times with the basic safety requirements in the	The title concept is quite ambiguous. Will the owner of the holding, of the plot, be the lessee of the plot?	R. The current text is correct and clear enough. No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		event of fire for which they were designed.		
182	particular	RSCIEI Article 12(1): '... Con la finalidad de que se puedan complir an todo momento con las exigencias...'	Typo. Replace 'puedan' with 'pueda'	R. It is not considered that there is an error in the text.
183	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Article 12(4)(1) of the RSCIEI '4. If alterations are made to the establishment once the establishment has been commissioned, the documents required by Articles 10 and 11 shall be resubmitted for the party concerned, provided that such alterations are significant. On the other hand, it will not be necessary to submit such documents if the alterations made are not significant because they do not affect compliance with the requirements of the Regulation, in which case it will be sufficient for the owner to document and justify that situation, keeping the information available to the competent authorities and supervisory bodies carrying out the periodic inspections.'	This amendment should be in line with the amendment of the first proposed additional provision above. Where it states 'If alterations are made to the establishment once the establishment has been commissioned, the documents required in Articles 10 and 11 shall be resubmitted for the affected party, provided that such alterations are significant.' replace with 'If significant alterations are made to the establishment once the establishment has been commissioned, the requirements of this Regulation shall apply to the affected party, which is generally considered to be the sector or fire area concerned. However, the competent body of the relevant Autonomous Community or of the cities of Ceuta and Melilla may require, if it deems appropriate, the application of the regulation to other sectors and areas of fire, or even to the industrial establishment in its entirety. And, in such cases, the documents required by Articles 10 and 11 shall be re-submitted for the party concerned.'	PA. Several parts of the text have been modified in other articles, clarifying the various possible situations.
184	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Article 12(4)(2) of the RSCIEI 'For these purposes, the following shall be deemed significant alterations: extensions and renovations entailing an increase in the area or an increase in the level of intrinsic risk for which the establishment was designed, as well as any other changes that could compromise compliance with the basic safety requirements in the event of a fire for which the establishment was designed or resulting in a higher requirement of	Replace with: 'For these purposes, the following shall be deemed significant alterations: extensions and renovations implying an increase in the area or an increase in the level of intrinsic risk of the fire sectors or areas for which the establishment was designed, as well as any other changes that may compromise compliance with the basic safety requirements in the event of a fire for which the establishment was designed, with particular attention to the case of the application of equivalent safety or performance design techniques, or which leads to a higher requirement of requirements as set out in the Annexes to this Regulation. Non-significant alterations to those that do not imply any of the above (such as	R. The concept of 'significant alteration' has been moved to definitions. On particular cases of design or equivalent security, it is understood that it is not necessary to explicitly mention them here, since the conditions for compliance are already detailed in other articles.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		requirements as referred to in the Annexes to this Regulation. Non-significant alterations to those that do not imply any of the above (such as changes in the distribution in plant, machinery or location of the shelves, provided that they do not imply an increase in the level of intrinsic risk for which it was designed, nor does it compromise the fulfilment of other requirements such as evacuation, sectorisation, or any other).'	changes in the distribution in plant, machinery or location of the shelves, provided that they do not imply an increase in the level of intrinsic risk of their sectors or fire areas for which it was designed, nor does it compromise the fulfilment of other requirements such as evacuation, sectorising, or any other).'	
185	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Chapter III, Article 12.4 'Involving an increase in the area or an increase in the level of intrinsic risk for which the establishment was designed'	Add that which is underlined *'Involving an increase in the surface or an increase in the intrinsic risk level* **of the fire sector** *for which the establishment was designed'.*	R. The current text is correct. It can refer to the sector, to the area, as well as to what there is. No changes are necessary.
186	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Article 12(4), final paragraph. Subsidiary to the previous, joint submission on Articles 10 and 12. Operation, maintenance and alterations.	Where it says: 4. (...) For these purposes, significant alterations shall be considered... **Proposal**: 4. (...) For these purposes, the following shall be deemed significant alterations: extensions and renovations entailing an increase in the area of 20 % or an increase in the level of intrinsic risk for which the establishment was designed, as well as any other substantial change likely to compromise compliance with the basic safety requirements in the event of a fire for which the establishment was designed or resulting in a higher requirement for requirements as referred to in the Annexes to this Regulation.' **Reason**: In the submissions relating to Articles 10 and 12, it is proposed to replace the indeterminate legal concept of substantive amendments with the list of cases in which this situation is limited. It is also proposed to include in Article 3 the definition of the	PA. The concept of 'significant alteration' has been moved to definitions. On the cases covered by the definition, it is deemed that it is not appropriate to set limits by size or surface. The definition that has been included is deemed to be sufficiently clear and detailed.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			concept of 'significant amendments', relevant to the application of the Regulation. As a proposal for clarity, systematic standard and legislative technique, it is proposed to incorporate in the article for the definitions of the Regulation the significant amendment contained in Article 12(4), with the proposed diction of this concept. Article 10 refers to the concept of significant alteration with reference to Article 12(4) and general to the provisions of the regulation which should be limited to the legal definition in order to provide it with uniformity and legal certainty. It is proposed that the surface area increase be considered significant alteration in increments above 20 %, since it will always be considered when there is an increase in the intrinsic level of risk, without considering in this case the area. Therefore, surface area increases of less than 20 % without an increase in the intrinsic risk level does not justify it being deemed a significant alteration.	
187	General Secretariat for Industry and Mines, Government of Andalucía	RSCIEI, Article 12.4.	We understand that some minimum should be placed on the surface area increase so that it can be considered a significant alteration by default.	R. The concept of 'significant alteration' has been moved to definitions. As regards the cases covered by this concept, it is deemed that it is not appropriate to set area limits. Note furthermore that it is aligned with what is set out in Article 2.2.
188	FEDAOC	Article 13.1 periodic inspections	Since it has been thought that a five-year period for inspections of industrial establishments after 2005 is adequate, regardless of their intrinsic risk level, it does not seem logical to maintain a periodicity of 10 years for inspections of industrial establishments prior to 2005, which in most cases do not have passive protection and only have active protection, being establishments with a very high risk. In the same way as for the rest of non-industrial establishments, 10 years is an excessive period of time that has no equivalence in any other industrial safety regulations and it would be advisable to modify Article 22(1) of the RIPCI, through the fifth final provision to correct this inequality.	PA. On industrial establishments prior to 2005: This consideration has been added in the first DA (since it is talking about old establishments), and establishing inspections every five years (and not every 10). On current establishments: It is deemed that a periodicity of five years for all is adequate. An establishment can have different sectors, each with different sizes and densities of fire load, and for which different construction requirements are sought, de-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			We think it is not appropriate to establish the same period for different levels of risk, since in a facility with high NRI, the chances of starting a fire are greater and the consequences are more serious. We believe that the objective of categorising at different levels of risk, in addition to defining the design of the installation, should be in line with the periodicity of inspection as is the case in other regulations such as refrigeration plants.	pending on the characteristics of the sector. With regard to inspections, the approach given is that the entire establishment as a whole should be inspected, all of it with the same periodicity, establishing this in five years for all cases.
189	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Article 13, page 34** '1. Regardless of the inspection role assigned to the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla, operators of industrial establishments must request the periodic inspection of their facilities from a supervisory body authorised for those tasks in accordance with Royal Decree 2200/1995 of 28 December. The frequency with which such inspections will be carried out shall not exceed five years.	The report of the Regulatory Impact Analysis approving the RD justifies the burden of inspections of low and medium risk are the main cost of administrative burdens. This fact does not correspond to the reality, given that the RSCIEI inspections for this type of establishment have a much lower cost than that provided in the analysis report. The decreased frequency of inspections in establishments reduces safety in industrial establishments. **PROPOSAL:** 1. Regardless of the inspection role assigned to the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla, operators of industrial establishments must request the periodic inspection of their facilities from a supervisory body authorised for those tasks in accordance with Royal Decree 2200/1995 of 28 December. The frequency with which such inspections are to be carried out shall not exceed 5 years in medium or low risk establishments and three years for high-risk establishments. The next inspection that will be carried out by the establishment will be based on the frequency applicable to it according to Royal Decree 2267/2004, and from this, the periodicity dictated by this new RD will apply.	R. The costs mentioned in the MAIN are only reference costs. On the other hand, with the new project, the establishments are not classified as low/ medium/high as a whole, but only their sectors or areas. This change was made because it is estimated that this classification as a whole is not precise, with the need to speak of sectors/areas and not of the whole establishment. Therefore, the new text means it is not appropriate to differentiate establishments as high/medium/low as a whole. Lastly, it has been considered appropriate to align the periodicity of periodic inspections so that in all cases it is the same.
190	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	RSCIEI Article 13. Periodic inspections	By indicating the phrase 'The frequency with which such inspections will be carried out shall not exceed five years' is it referring to establishments that have to carry out inspections by the RSCIEI? Point 2(c) should change 'construction project' to 'technical project for the implementation of the RSCEI'	A. In the first point, the wording has been changed to make it clearer. In the second point, on the allusion to the project, the wording is also changed to a simpler one and aligned with the rest of the regulation.
191	GENERAL		Article 13. Periodic inspections	R. With the new project the establish-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Article 13. Periodic inspections 1. Regardless of the inspection role assigned to the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla, operators of industrial establishments must request the periodic inspection of their facilities from a supervisory body authorised for those tasks in accordance with Royal Decree 2200/1995 of 28 December. The frequency with which such inspections will be carried out shall not exceed five years.	1. Regardless of the inspection role assigned to the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla, operators of industrial establishments must request the periodic inspection of their facilities from a supervisory body authorised for those tasks in accordance with Royal Decree 2200/1995 of 28 December. The frequency with which such inspections will be carried out shall not exceed: a) Five years, for establishments of low intrinsic risk. b) Three years, for establishments of average intrinsic risk. c) Two years, for establishments of high intrinsic risk.	ments are not classified as low/ medium/high as a whole, but only their sectors or areas. This change was made because it is estimated that this classification as a whole is not precise, with the need to speak of sectors/areas and not of the whole establishment. Therefore, the new text means it is not appropriate to differentiate establishments as high/medium/low as a whole. Lastly, it has been considered appropriate to align the periodicity of periodic inspections so that in all cases it is the same.
192	FEDAOC	Article 13(2) periodic inspections	In section (b), an alternative wording could be: *That the typology of the establishment and the level of intrinsic risk of each of the sectors and areas of fire continues are to be maintained.* There is no longer a level of risk intrinsic to the whole establishment, so it could be wrongly interpreted that we must check it. In section (d), an alternative wording could be: *'It shall also be verified that the facilities to which the Fire Protection Facility Regulation applies have passed their maintenance checks, at least during the last five years'*. This way, this point would resemble the one requested in R.D.513/2017. If you want to complete also with operations that exceed the five-year frequency, which would be advisable, for example, to check the ten-year operations and those of the 25 years, another option would be: *'It shall also be verified that the facilities to which the Fire Protection Facility Regulation applies have passed their latest maintenance reviews, unless the full range of operations that are applicable and indicated in the RIPCI, the CSR and the applicable UNE standards is in force.*	R. The current text is clear enough. No need to make changes.
193	STATE AGENCY FOR RAILWAY SAFETY	Article 13.2 (e)	Equivalents, add plural 's'	R. The word 'equivalent' is written properly. It's not a typo.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
194	Directorate of Strategic Projects and Industrial Administration, Basque Government	Article 13. *Periodic inspections* 2. Regular inspections shall verify compliance with the applicable legislation, highlighting the following aspects: The Director-General for Industry and SMEs may, by resolution, draw up instructions for supervisory bodies where the checks to be carried out during inspections are carried out in greater detail.	Proposal: The deletion of Article 13(2), final indent, is deemed: *Delete: 'The Director-General for Industry and SMEs may, by resolution, draw up instructions for supervisory bodies where the checks to be carried out during inspections are carried out in greater detail.'* Justification: This provision may encroach on powers which may fall within the competence of the Autonomous Communities, given that many of them have, inter alia, the implementation powers in the field of industry and industrial safety. The instructions are guidelines issued by the higher bodies to direct the activity of the lower bodies, by homogenising criteria or by clarifying the way in which the provisions that are observable should be applied or interpreted. Secondly, it is noted that the power to issue instructions should not be recognised at the legislative headquarters, since it is the same as in the list of powers of any administrative body with managerial powers.	A. The paragraph is deleted and, in its place, reference has been added to standard UNE 192005-1 which develops this aspect.
195	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Article 13 of the RSCIEI, final section of section 2 'The Director-General for Industry and SMEs may, by resolution, draw up instructions for supervisory bodies where the checks to be carried out during inspections are carried out in greater detail.'	It is proposed to delete this paragraph and incorporate it, with amendments, into the proposed fourth additional provision referred to above.	PA. The paragraph has been deleted.
196	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL	*Article 13. Periodic inspections* 2. Regular inspections shall verify compliance with the applicable legislation, highlighting the following aspects:	***Article 13. Periodic inspections*** *2. Regular inspections shall verify compliance with the applicable legislation, highlighting the following aspects:* *a) That there have been no changes in the activity with respect to the documentation of its initial state, whether in its distribution, spaces or products, that affect its NRI or compromise compliance with other requirements indicated in this Regulation.*	PA. The wording is slightly changed, however, it does not reach the level of detail proposed by the submission because a greater degree of detail is not deemed necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	EXPERTS OF SPAIN	a) that there have been no changes in the activity or extensions that are not in accordance with the provisions of these Regulations.	JUSTIFICATION: Our corporation considers it more appropriate to use the concept of 'significant alterations' than the term 'extensions' for terminological coherence since the concept of 'significant alterations' is used in Articles 10.1 and 12.4 of the RISCIE draft. Moreover, Article 12(4) provides a definition of this concept which includes the term 'enlargements': "Article 12. *Operation, maintenance and alterations* *4. For these purposes*, significant alterations shall be deemed the following*: enlargements and renovations involving an increase (...)'*	
197	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	RSCIEI **Article 16. *Communicating fires*** The owner of the industrial establishment must notify the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla, within the maximum period of **15 working days**, of any fire that occurs in the industrial establishment in which at least one of the following circumstances occurs:	The experience gained in applying the regulation currently in force shows that 15 are excessive, because when the premises of the establishment are visited, sometimes the conditions of the environment have already been changed. It is proposed to put 24 hours, to avoid manipulations and evictions that prevent assessing the extent or reasons for the fire	R. It is understood that the current deadline is appropriate for the objective pursued.
198	particular	RSCIEI Article 16: '... in which, at least, one of the following circumstances occurs:'	Simpler wording: '... in which any of the following circumstances arise:'	A. The has been amended.
199	Superior Council of the Colleges of Architects of Spain	RSCIEI. Article 16 on 'Communicating fires' sets out a number of circumstances for this communication: 'The owner of the industrial establishment must notify the competent industry body of the relevant Autonomous Community or the cities of Ceuta and Melilla, within a maximum period of 15 working days, of any fire occurring in the industrial establish-	Communication in relation to material damage should not only be conditional on the financial amount, and may include: e) That result in structural damage. f) That result in damage to the thermal envelope. g) That result in damage to the facility.	R. The current wording is deemed to be adequate and the criteria are sufficiently precise and objective.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ment in which, at least, one of the following circumstances occurs: a) The occurrence of personal injury that requires external medical attention. b) That causes a total cessation of industrial activity. c) That there is a partial cessation of more than 14 days of industrial activity. d) which results in material damage exceeding EUR 30,000.'		
200	Subdirectorate-General for Industry, Government of Valencia	Article 17. Investigating fires	There should be a national fire register analysing the causes and reasons why fires have occurred, from which conclusions can be drawn on the assessment of fire risks in some establishments, or on the means of fire protection to be installed in some special establishments. This Article could indicate its subsequent creation by some normative provision.	R. It is deemed that the current wording is adequate, and that there is no need to add other requirements. It is not deemed feasible to create such a register in this regulation. If it already existed, reference would have been made to it, but that is not the case.
201	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	Article 18. Infringements and penalties	Reference should only be made to the Industry Act	A. The has been amended.
202	Official College of Industrial Engineers of the Valencian Community	Annex I, point 1: Classifying buildings and open spaces according to their layout	Annex I, page 1. Where it says 'These will be classified', **It is proposed:** 'These **buildings** will be classified' In general, the regulation should replace, as far as possible, demonstrative pronouns with demonstrative adjectives to avoid ambiguity regarding the subject. This would remove ambiguities in interpretation.	R. It does not refer to buildings alone, but to buildings, open spaces or parts thereof. The current Annex I is clear about this.
203	SFPE Spain	ANNEX I CHARACTERISATION OF INDUSTRIAL ESTABLISHMENTS This annex details how industrial establishments can be characterised in	In industrial plants, there are industrial establishments that can be in buildings, open spaces and industrial type structures that have a specific process associated. Examples of the latter are the industrial pipe bridges or 'Pipe Racks', mul-	R. The current text is clear enough and already includes the things that are quoted in the comment within the current typologies.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		relation to fire safety. ...	tilevel process constructions, which can be opened or closed partially or completely, conveyor belts, silos, warehouses (not only associated with the logistics sector, but raw materials such as coal), energy production buildings, structural systems that support equipment and so on and so on. This is why it is proposed to extend and refine the characterisation of industrial establishments (since only a building is classified) to the following: *'This annex details how industrial establishments can be characterised in relation to fire safety. To do this, firstly, the buildings, **industrial structures** and open spaces that form the establishment must be classified according to their layout. Subsequently, fire sectors (in buildings and industrial buildings) and fire areas (in open spaces) must be identified and, finally, the intrinsic risk level of each sector and area must be calculated'.*	
204	particular	Annex I RSCIEI, section 1. Classification of buildings and open spaces according to their layout, in the following text: '*For establishments with several buildings, these shall be deemed independent buildings of the same establishment when the separation distance between them is greater than 3m, or, when their adjacent walls meet the requirements of separating walls between fire sectors, having also load-bearing structure and independent enclosure. Otherwise, such buildings shall be deemed a single building for the purposes of this classification.*'	The phrase is not understood, as situations are being mixed up between buildings in the same establishment with their location with other establishments. I do not think that what is intended with this phrase is incorrect, simply that it should be complemented by a graphic example. As drafted, what is understood is that in the case where the distance is 0 m, two buildings attached to the same establishment must have walls that meet the requirements of separating walls between sectors, and in addition this must be independent of the annex building and the structure of both independent, in order to be independent from each other, for the purposes of classifying these with respect to other buildings, if this means I can not imagine for which specific case has been added, I insist that it should be accompanied by a graph to ensure understanding, since in some way I see that it has something to do with note 5 to Part 1.1. External spreading, which I also claim at the next point.	R. What the phrase says is that if two buildings are together and non-sectored, for the purposes of classification they form a single building. It is understood that the text is appropriate.
205	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex I. Section 1.1.1. Page 38	To enable the A_H to meet the Type B requirements of Annexes II, III and IV, and to allow any level of risk to be installed provided that they warrant compliance with the	R. The existence of the Ah typology is created to differentiate it from B and to be able to place specific requirements

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			safety objectives: evacuation, intervention and damage to third parties **PROPOSAL:** For industrial establishments type A_H, compliance with the requirements corresponding to type B shall be accepted, provided that it is technically justified that the possible collapse of the structure does not affect the adjacent buildings nor damage the compartmentalisation.	on each of the two cases. No changes are necessary.
206	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex I. Section 1.1.2 and 1.1.3. Page 38 Building type B: The establishment in question fully occupies a building, with a supporting structure and independent enclosure, which is adjacent to another, or other, buildings of another establishment; or rather, it is at a separation distance equal to or less than 3m from another, or other, buildings of another establishment, whether these for industrial use or other uses Building type C: The establishment in question fully occupies one or more buildings, which are at a distance of more than 3m from the nearest building to other establishments. That distance must be free of combustible goods or intermediate elements capable of spreading the fire	If the aim is to reduce requirements because distances help prevent the spread of fire and damage to third parties, the distance of 3 m is arbitrary, and in most cases will not work. Spreading and damage to third parties will be avoided if the structure is properly designed, taking into account the fire and if safety distances are left, there are firewall walls or a combination of both. There are inconsistencies with the current categorisation, since two type B establishments at 3 m will have both façades at least EI120 and R60-120 structure, and two type C establishments at 3.01 m distance do not have fire resistant façades and R30-90 structure. **PROPOSAL:** In order to be consistent with the risk posed by a building and its level of demand, it is proposed that the categorisation should be as follows: Building type B: The establishment in question fully occupies a building, with a supporting structure and independent enclosure, which is adjacent to another, or other, buildings of another establishment; or rather, it is at a separation distance that does not prevent possible damage to third parties (equal to or lower than the height of the building). For type B industrial establishments, compliance with the requirements of Type C shall be accepted, provided it is technically justified that the possible collapse of the structure does not affect the adjacent craft or damage the compartmentalisation, and it is justified that there is no risk of spreading to industrial units of adjacent establishments.	R. Current text is understood to be correct, adequate and sufficiently clear. The concept of type C layout (and its differentiation from type B) is based on what already appears in the 2004 regulation which is proportionate, simple to apply and control, and has proven to work properly.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			Note: This justification does not imply that the project is financial, but advanced calculation methods can apply such as those contemplated in Eurocodes. Building type C: The establishment in question fully occupies one or more buildings, which are at a separation distance greater than their height. That distance must be free of combustible goods or intermediate elements capable of spreading the fire.	
207	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex I, Section 1.1.2 Type-B building	At the end, add and plot limits with the possibility of building on them.	R. The current text is correct and clear enough. No changes are necessary.
208	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex I, Section 1.1.3 Building Type C	At the end, add and plot limits with the possibility of building on them.	R. The current text is correct and clear enough. No changes are necessary.
209	Official College of Industrial Engineers of the Valencian Community	Annex I, point 1.1.1: Type A building	Annex I, page 1. Where it says 'The establishment in question partially occupies a building that has...' It is proposed: 'It is that building which is partially occupied by an establishment and which has...'	R. The current text is correct and clear enough. The proposal of the comment does not improve the wording. No changes are necessary.
210	Official College of Industrial Engineers of the Valencian Community	Annex I, point 1.1.2: Type-B building	Annex I, page 2. Where it says 'The establishment in question fully occupies a building, with supporting structure and independent enclosure' It is proposed: 'It is totally occupied by an establishment, with a supporting structure and independent enclosures' The definition of a building within the scope of this regulation is required. A broader glossary of terms and definitions is required.	R. The current text is correct and clear enough. The proposal of the comment does not improve the wording. No changes are necessary.
211	Official College of Industrial Engineers of the Valencian Commu-	Annex I, point 1.1.3: Type C building	Annex I, page 3. 1.- In the first paragraph, where it puts *'The establishment in question fully occupies one or more buildings, which are... '* **It is proposed: *'It is the one occupied entirely by an estab-***	R. The current text is correct and clear enough. No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	nity		***lishment that is at a separation distance...*** This draft regulation characterises establishments and classifies buildings. This is a classification section of **buildings**. An establishment can have several types of buildings. There are no longer establishments type A, B or C establishment, but AV, AH, B or C buildings within an establishment. 2.- In the second paragraph, where you put *'adjoining walls'* **We propose: *'adjoining closures'*** An enclosure is a kind of wall that closes off a space, in this case, a building. Additionally, a glossary of terms should be defined, including at the least: Adjacent enclosure, Adjoining enclosure, Façade. It must be clarified what the condition and position is that is required of an enclosure of a building to be a façade. The façades have a specific regulation regarding the basic requirement of external spreading.	
212	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX I. POINT 1.1. Building layouts. 1.1.3. Type C building	For establishments with several buildings, these shall be deemed separate buildings of the same establishment where the separation distance between them exceeds 3m, or where their adjacent walls comply with the requirements of separating walls between fire sectors, also having a load-bearing structure and independent enclosure. Otherwise, such buildings shall be deemed a single building for the purposes of this classification.' **It is proposed** complete the wording with: 'Otherwise, such buildings shall be deemed a single building for the purposes of this classification. In the case of connections between different establishments or buildings, such as tunnels, walkways or conveyor belts, necessary for production reasons, type C establishments may continue to be considered, provided that such communications meet the requirements of separating walls and have a separate structure. In addition, they must ensure evacuation conditions as if they were a sector independent of any of the establishments they connect with, and those establishments should in turn ensure those conditions.' **Reason**: The current wording does not clarify what happens	A. A paragraph has been added reflecting this casuistry.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			when two or more establishments are connected via walkways or tunnels to provide merchandise. In this case, it has stated that the municipal or industrial expert consider both establishments as type B despite guaranteeing the sectorisations and evacuations. Therefore, it is reasonable to mention such establishments in order to continue to be regarded as Type C under a number of conditions.	
213	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	***Annex I. Characterisation of industrial establishments*** 1. Classification of buildings and open spaces according to their layout 1.1. Building layouts 1.1.1. Type A building: (...) In the event the establishment in question occupies the entire building, with a supporting structure and independent enclosure, it shall be classified as type B or C as appropriate, according to what is indicated in the following paragraphs.	***Annex I. Characterisation of industrial establishments*** 1. Classification of buildings and open spaces according to their layout 1.1. Building layouts 1.1.1. Type A building: (...) In the event the establishment in question occupies the entire building and has a single title and has a load-bearing structure and independent enclosure, it shall be classified as type B or C as appropriate, according to the indicated in the following paragraphs. JUSTIFICATION Article 3 of the RSCIEI project defines 'industrial establishment' in the following terms (<u>underlining and bold is ours</u>): '<u>a) Industrial Establishment:</u> Industrial establishment is understood to be that intended to be used under a differentiated ownership, and the main use of which is industrial, as referred to in Article 2.1. Industrial establishments may consist of a set of one or more buildings, parts thereof and open spaces'. Our corporation deems that the regulation of the type A building should include this subsection in order to avoid confusion in its application.	R. The definition of industrial establishment is defined in the articles, with Annex I being the place where a series of classifications are established. It is not appropriate to repeat requirements or definitions in Annex I that are already contained in the articles. On the other hand, the wording of Annex I is deemed to be sufficiently clear.
214	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL	ANNEX I CHARACTERISATION OF INDUSTRIAL ESTABLISHMENTS Building layouts. This does not take into account the case that was considered in Royal	What happens to existing industrial units with this type of typologies already implemented, if the new regulation had to be applied to them?	C. The submission is a comment that does not include specific proposals. In any event, the text of the draft is sufficiently clear on the subject. The regulation does not automatically apply to old establishments. In any event, if the new

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Decree 2267/2004, of typology B with structure shared with the adjacent ones.		regulation had to be applied to them, different ways are given to be able to do so.
215	KREAN S.COOP	ANNEX I CHARACTERISATION OF INDUSTRIAL ESTABLISHMENTS 1.1.3. Building type C: The establishment in question fully occupies one or more buildings, which are at a distance of more than 3m from the nearest building to other establishments. That distance must be free of combustible goods or intermediate elements capable of spreading the fire.	It is common in industrial buildings to locate the staff car parks in the spaces next to the industrial units. Is this condition deemed to be met if we have parking area or loading docks?	A. A consideration of the cases of car parks has been added to Annex II, along with the one already existing referring to loading docks. This situation is thus considered in the text.
216	SFPE Spain	ANNEX I Point 1.1 Building layouts Point 1.1.1. Building-Type A	It is proposed to change the name of 'Building-Type A' to 'Industrial structure type A', so that it covers any type of construction, not just a building.	R. Type A encompasses buildings. The right word is buildings, not structures. Change the current text is not appropriate.
217	SFPE Spain	ANNEX I Point 1.1 Building layouts Point 1.1.1. Type A building After reading the following paragraph, 'In the event that the establishment concerned occupies the entire building, with a supporting structure and independent enclosure, it shall be classified as type B or C as appropriate according to what is indicated in the following paragraphs.'	It is proposed to change the name of 'buildings' to 'structures'. It is proposed to change the name of 'Building Type A' to 'Industrial structure type A', so that it covers any type of construction, not just a building. Should it be interpreted in light of the definition of 'load-bearing structure' (see Annex II, point (b) in Definitions) that it is necessary to implement a double pillar to ensure structural independence? In structural engineering, both at room temperature and for the situation of accidental fire, it is not necessary to implement this double-pillar measure to guarantee structural independence between constructions. On the other hand, there is a lack of a clear definition of what the regulation seeks to regulate with 'structural independence'.	R. The current text is correct and clear enough. Each of the types explains what their requirements are. No changes are necessary.
218	SFPE Spain	ANNEX I Point 1.1 Building layouts	It is proposed to change the name of 'buildings' to 'structures' It is proposed to change the name of 'Type-B building' to 'In-	R. The right word is buildings, not structures. Change the current text is not appropriate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		Point 1.1.2. Type-B building	dustrial structure type B' so that it covers any type of structure, not just a building.	
219	SFPE Spain	ANNEX I Point 1.1 Building layouts Point 1.1.3. Type C building	It is proposed to change the name of 'buildings' to 'structures' It is proposed to change the name of 'C-type Building' to 'C-type industrial structure' so that any type of structure, not just a building, is included.	R. The right word is buildings, not structures. Change the current text is not appropriate.
220	SFPE Spain	ANNEX I Point 1.1 Building layouts Point 1.1.3. Type C building After reading the following paragraph: 'For establishments with several buildings, these shall be deemed independent buildings of the same establishment when the separation distance between them is greater than three 3m, or, when their adjacent walls meet the requirements of separating walls between fire sectors, having also load-bearing structure and independent enclosure. Otherwise, such buildings shall be deemed a single building for the purposes of this classification.'	It is proposed to change the name of 'buildings' to 'structures'. After reading the previous paragraph it is not clear that although it is fulfilled that '*the separation distance between them is greater than 3m, or... having also load-bearing structure and independent enclosure*' there is no impact on structures. Lacking in the RSCIEI definitions related to the structural performance of any construction regulated by the 2022 RSCIEI draft is clarifying in greater detail when real structural independence can be established between constructions from a structural engineering point of view, in order to demonstrate that a progressive or disproportionate collapse of one construction does not affect another or next building, even more than 3 m away.	R. The right word is buildings, not structures. On the other hand, the current text is correct and clear enough. Each of the types explains what their requirements are. No changes are necessary.
221	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex I. Section 1.2.1. Page 40. paragraph 2. In the case where the space has covered areas, its lateral and covered enclosures must have a total area permanently open to the outside of not less than 15 % of the surface of the total envelope (the sum of the lateral and covered surfaces, without the need to add the surface of the ground), which must be distributed in such a way as to allow rapid dissi-	Is there any justification for limiting it to that 15 % and 25 m? The 25 m limit to D buildings of maximum dimensions 50 m x 50 m, which is very exclusive. By way of reference, the French regulations on the storage of fuel products (Decree of 17 August 2016 on the prevention of accidents in storage) define storage as open to that which is not closed within at least 70 % of its perimeter. **PROPOSAL:** In the event that the space is covered, its façades must have a total lateral area permanently open to the outside of at least 70 %	PA. This section has been restructured. The percentage of opening has been better specified to make it clearer and better coordinated with the requirements of Annex II.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		pation of heat and smoke, and there should be no more than 25 m in horizontal projection from any covered point to the open sides or uncovered areas.		
222	Directorate of Strategic Projects and Industrial Administration, Basque Government	Annex I 1.2. Open space layouts 1.2.1. **Type-D space:** The establishment considered occupies an open space. In the case, where the space has covered areas, its lateral and covered enclosures must have a total area permanently open to the outside of not less than 15 % of the surface of the total envelope (the sum of the lateral and covered surfaces, without the need to add the surface of the ground), which must be distributed in such a way as to allow rapid dissipation of heat and smoke, and there should be no more than 25 m in horizontal projection from any covered point to the open sides or uncovered areas. These spaces may have certain specific closed areas, such as toilets or changing rooms, as long as they do not host the main activity of the establishment and do not increase the risk of fire.	Proposal: In the case that the space has covered areas, its side enclosures and roof must have a total area permanently open to the outside not less than **20 %** of the surface of the total envelope (the sum of the lateral and covered surfaces, without the need to add the surface of the ground), which must be distributed in such a way as to allow rapid dissipation of heat and smoke, and there should be no more than 25 m in horizontal projection from any covered point to the open sides or uncovered areas. **The total length of openings considered to provide natural ventilation shall not be less than 40 % of the perimeter.** These spaces may have certain specific closed areas, such as toilets or changing rooms, as long as they do not host the main activity of the establishment and do not increase the risk of fire. **In any event, the interior walls must be open at least 20 % with evenly distributed openings.** Exception: Openings are not required to be distributed over 40 % of the building perimeter when the required openings are evenly distributed on two opposite sides of the building Justification: 2021 International Building Code (IBC) – 406.5.4.1 Single use. 406.5.2 Openings. For natural ventilation purposes, the outside of the structure shall have openings evenly distributed on two or more sides. The area of such openings on the outer walls of a level should not be less than 20 % of the total area of the perimeter wall of each level. The total length of the openings considered to provide natural ventilation shall not be less than 40 % of the perimeter of the level. The inner walls must be open at least 20 % with evenly distributed openings. Exception: Openings are not required to be distributed over 40 % of the building perimeter when the required openings are evenly distributed on two opposite sides of the building.	PA. This section has been restructured. The percentage of opening has been better specified to make it clearer and better coordinated with the requirements of Annex II.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
223	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex I, Section 1.2 Building type D First paragraph: '... either covered by structures which do not have lateral enclosures in whole or in part.'	Add that which is underlined *'...or covered by structures* **light and single-floor** *that lack all or part of side enclosures.'*	R. It is not deemed necessary to add this clarification. On the other hand, it is understood that they will normally be of one floor or level, however, the industry has very different particularities where there can be structures of several levels that are not buildings in themselves, but open structures, depending on the productive needs of the particular sector.
224	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex I, Section 1.2 Building type D Second paragraph: '...their side enclosures **and roof** must have a total area permanently open to the outside not less than **15 %** of the **total** envelope surface area **(the sum of side surfaces and cover, without needing to add the floor surface**)...'	Replace with: *'...their side enclosures must have a total area permanently open to the exterior not less than* **50** *% of the* **lateral** *envelope surface area...'*	PA. This section has been restructured. The percentage of opening has been better specified to make it clearer.
225	CEPREVEN	Annex I, section 1.2.1. In the case, where the space has covered areas, its lateral and covered enclosures must have a total area permanently open to the outside of not less than 15 % of the surface of the total envelope (the sum of the lateral and covered surfaces, without the need to add the surface of the ground), which must be distributed in such a way as to allow rapid dissipation of heat and smoke, and there should be no more than 25 m in horizontal projection from any covered point to the open sides or uncovered areas.	The concept of *fast heat dissipation and smoke* is not defined, which hinders an objective justification of this issue in the various projects. In addition, the following clarification is suggested in the wording of the paragraph: *In the case that the space has covered areas, its lateral enclosures and roof must have a total area permanently open to the outside of not less than 15 % of the surface of the total envelope (the sum of the lateral and covered surfaces, without the need to add the surface of the floor), which must be distributed in such a way as to allow rapid dissipation of heat and smoke, and there should be no more than 25 m of distance in horizontal projection from any covered point to the sides* ***partial or fully*** *open or uncovered areas.*	PA. This section has been restructured. The percentage of opening has been better specified to make it clearer and better coordinated with the requirements of Annex II.
226	THE COMMUNITY OF MADRID FIRE BRIGADE	**1.2. Open space layouts** 1.2.1. **Type D space:** The establishment considered occupies an open	**1.2. Open space layouts** 1.2.1. **Type-D space** The percentage of 15 % is deemed to be a very low percent-	PA. This section has been restructured. The percentage of opening has been better specified to make it clearer.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		space. The open space may be uncovered, or covered by structures that wholly or partially lacking part of lateral enclosures. In the case, where the space has covered areas, its lateral and covered enclosures must have a total area permanently open to the outside of not **less than 15 % of the surface of the total envelope** (the sum of the lateral and covered surfaces, without the need to add the surface of the ground), which must be distributed in such a way as to allow rapid dissipation of heat and smoke, and there should be no more than 25 m in horizontal projection from any covered point to the open sides or uncovered areas.	age, and may result in inappropriate layout assignments. It is proposed to make the difference for this typology even greater, raising the percentage to 25 %.	
227	General Council of Official Colleges of Industrial Engineers	Annex I, point 2: Identification of fire sectors and areas	Annex I, page 5. 1.- Point 2.1: The definitions of Fire Sector and Fire Area are not sufficiently clear. For example: In Fire Sector: 'Area of a building, located inside it, in which the fire may be confined (or excluded) so that it cannot spread to (or from) others...' in the case of Fire Area, consider a more precise definition. The definitions of the Regulation and that of the CTE DB SI Annex A page 78 should be reconciled. 2.- Point 2.2: Where it says: 'When it comes to planning how an establishment will be sectored'	R. The current text is sufficiently clear, and is adapted to what this regulation regulates: establishments, regardless of whether they are inside a building or outdoors. The verb 'to sector' is used interchangeably for fire sectors and areas (in buildings or outside areas), meaning 'separate' or 'share'.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			It is proposed: 'When it comes to planning how **the buildings of** an establishment will be sectored. The buildings are sectored. Where it says: *'sectoring the establishment according to the* risk of each activity' **It is proposed:** 'sectoring **the building** according to the risk of each activity'	
228	SFPE Spain	ANNEX I Point 1.2 Open space layouts Point 1.2.1. Type D space	At this point, it is not understood why nothing is mentioned about the concept of independent load-bearing structures.	A. A clarification on this matter has been added in Annex II, which sets out requirements for this typology for the structure (where there is since, if it is an open space, a priori it will not have structure in most cases).
229	FEDAOC	Annex I point 1.3	The text should be clarified, since in the previous regulation, the technical guide explained that for joint or close establishments with the same owner, the building could remain type C, despite what was initially indicated in the regulation. It is not clear in this Regulation, only 'Where an establishment consists of several buildings, parts of buildings or open spaces with different layouts, each must be classified separately from other establishments, and the requirements of Annexes II, III and IV to the Regulation shall apply to each of them according to that classification'.	R. The new text is clear enough. The classification of buildings is compared to other establishments (not compared to other buildings in the same establishment).
230	KREAN S.COOP	ANNEX I CHARACTERISATION OF INDUSTRIAL ESTABLISHMENTS 1.3. Other considerations Where an establishment consists of several buildings, parts of buildings or open spaces with different layouts, each must be classified separately from other establishments, and the requirements of Annexes II, III and IV to the Regulation shall apply to each of them according to that classification	So, should an establishment consisting of several buildings regardless of its layout not be classified as type C according to the definition of type C establishment? *'type C: The establishment in question fully occupies one or more buildings, which are at a distance of more than 3m from the nearest building to other establishments. That distance must be free from combustible goods or intermediate elements capable of spreading the fire.'* Edit as: *Where a type C establishment consisting of several buildings, parts of buildings or open spaces with different layouts, each building shall be subject to the requirements of Annexes II, III and IV to the Regulation according to that classification is deemed to be of type C building or external area.*	R. The new text is clear enough. The classification of buildings is compared to other establishments (not compared to other buildings in the same establishment). On the other hand, the concept of 'building' should not be confused with that of 'establishment'.
231	Prevention Ser-	Annex I to the RSCIEI, section 2.1 (a)	Where it says 'Area of a building inside which the fire can be	A. The has been amended.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	vice of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	'a) Fire sector: Area of a building inside which fire may be confined (or excluded) so that it cannot spread to (or from) other fire sectors or areas, either by means of fire-resistant building elements or by means of perimeter spaces to the building.'	confined (or excluded)', replace with 'Area of a building inside which the fire can be confined (or excluded) for a specified period of time'	
232	THE COMMUNITY OF MADRID FIRE BRIGADE	2. Identification of fire sectors and areas 2.2. When planning how an establishment will be sectored, the nature of the activities to be carried out in it, its inherent risks, as well as the other factors that may influence safety must be taken into account. Based on this, it can be chosen to establish a single sector, or separate processes and storages into differentiated sectors, or...	**2. Identification of fire sectors and areas** 2.2... The reference to different 'fire areas' should also be included in this concept.	A. The has been amended.
233	particular	Annex I RSCIEI – Level of intrinsic risk of the sectors.	The methodology for calculating the fire load of the fire sectors and areas of fire has been modified, compared to the one defined for the previous regulation. This could result in the intrinsic level of risk of an existing sector or area, calculated using the new methodology, leading to an increase in the NRI, which would imply applying the first additional provision to the minimal renovation that would occur. This particular case should be envisaged in some way, probably by means of an additional provision, or by amending the first one, to exempt sectors or areas where something like this might happen if they had to adapt to the requirements of the new regulation. As an additional consideration, I point out that calculating the fire load is an exercise in which it is possible to assume a certain approximation of the result obtained, since there is no absolute knowledge, in many cases, of the quantities and nature of the existing materials (think of the case of a logistics warehouse, but not only), in addition to the fluctuations or changes that occur over time. The sophistication intro-	PA. Different casuistry have been considered in the articles. If the establishment complies with the previous regulations, a priori should not be adapted to the new one. On the other hand, in the case of extensions or changes that have to be adapted to the new regulation, different possible ways of carrying out the adaptation are provided. On calculating the fire load, Annex I gives different options to perform the calculation, and allows certain approximations. However, the new wording of Annex I is more detailed than that of the previous regulation, because it has been deemed necessary to better detail things so that the calculations and margins of approximation that are allowed

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			duced with the proposed new methodology is absurdly pretentious, and suffers from a practical sense. It would be much more sensible to keep the current methodology, in terms of the Ci coefficients, since most of the interventions made in the country, larger or smaller, will be carried out in existing establishments or buildings.	are more limited. In any event, in case of doubts or if it is not known exactly what the actual fire load will be in the future, you can always choose to use safety margins in the calculations, and oversize the design.
234	KREAN S.COOP	ANNEX I Table 1.1.	The fire load units used are MJ/m² Include Mcal/m²	R. It is not deemed appropriate to put the figures in several different units. The units used are correct.
235	AFELMA, Association of Spanish Insulating Mineral Wool Manufacturers	Annex I, Section 3. Characterisation of fire sectors and areas according to their intrinsic risk level In general, the use of formulas and values listed in the tables for the Qs estimation (Table 1.2, 1.3, 1.4 and 1.5)	The source of these tables and the data from which they are fed are unknown, as are the updating and validity of these values. It is not clear in the NRI how the existence of outdoor facilities (overheads or semi-detached) is analysed, but which are an inherent risk to that sector or establishment. Any equipment that is not fuel generates a risk of fire due to dysfunction, it should be clarified whether or not to add. If they need to be included, Table 1.4 and 1.5 appear insufficient to define the NRI	PA. The tables and methodology of the new Regulation, like those of the previous regulation, are based on the Gretener Method. In addition, the project executor is given the option to use calculations from specific product data (mass calculation), if he or she does not want to use the values given by activities. For outdoor facilities (on roof), a section on roof facilities with details on roofs has been added to Annex IV. On semi-detached, as appropriate, they shall apply the requirements set out in Annex II (for façades, or for cases such as loading docks), or, as the case may be, apply those already mentioned in Annex IV.
236	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex I to the RSCIEI, section 3.1(1) '3.1. The level of intrinsic risk (NRI) of a fire sector or area reflects the risk in that sector to a possible fire, derived from the quantity of combustible materials present, its ease of inflammation, distribution and nature of the activities carried out on the site.'	Where it puts 'and nature of the activities' to replace with 'and the nature of the activities'	A. The text has been added.
237	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex I. Section 3	The current RSCIEI clarifies what R to take when different activities coexist in the same sector (the largest, as long as the activity occupies an area greater than 10 %). The new	R. The proposed new text includes a table with the form of calculating 'R', which applies to all cases equally, mak-

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			RSCIEI does not specify which R to take in the case of having different activities. PROPOSAL: It is proposed to include the criterion to be followed in case of simultaneity of different activities within the same sector	ing it no longer necessary to add the 10 % criterion of the previous regulation.
238	Official College of Industrial Engineers of the Valencian Community	Annex I, point 3: Characterisation of fire sectors and areas according to their intrinsic risk level.	Annex I, page 7. Where it puts *'A = constructed surface area of fire sector or fire area, in square metres.'* Should put *'A = plant surface area of fire sector or fire area, in square metres'*. A particular interpretation of the term 'constructed surface area' may lead to unjustified 'dilutions' of the fire load density and therefore of the underestimation of the NRI. (That happens.) This could (can) lead to aisles or platforms between shelves to 'dilute' the fire load density, corrected and weighted. In the case of laterally or vertically open walkable shelves and shelves for the purpose of spreading the fire, i.e. for the purposes of NRI, the behaviour is similar to that of a conventional shelf and the fire spreads in any direction. If we want to avoid the spread to other plants built within a sector, it should be sectored and then that surface and its fire load would be extracted from the sector. In eurocodes, the calculation fire load density refers to Af (f for floor), area in plant. If this change is accepted, it must be taken into account in the following paragraphs that A ≤ If the walkable floors of the shelves and mezzanines are included, i.e. by superimposing fire loads on the same vertical. Annex I, page 8. Where it says: *'In addition, <u>in the case of not knowing the exact values</u> of a certain material (Gi, qi) may be used approximate estimates and safety coefficients, <u>provided that it is justified that the calculation obtained from Qs is equal to or higher than would be obtained if the exact values were used'</u>* <u>It is proposed:</u> Clarify the paragraph, as the exact values are unknown.	R. The proposed texts are sufficiently clear and specific to make the calculation reliable. The methods are similar to those of 2004, but more detailed. No further explanations are required in the text of the regulation.

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			Annex I, page 11. It is proposed: It should be explained more clearly what this paragraph (3.2.4.3) refers to and how 'recognised assessment methods' would apply. This paragraph is a performance gateway to the joint assessment of the NRI and its facilities of a fire sector. The RSCIEI prescribes (without explicit justification) facilities based on the NRI and the layout and size of the sector to have an acceptable risk index or level of risk (supposed). What is the relationship between these methods and the NRI. Gretener Methods, G.Purt (NTP 100), FRAME, MEREDICTE...? Which version? This should be clarified and qualified, say when and how these methods or other methods of recognised prestige should be applied, what additional variables in addition to the fire load come into play, etc. These methods typically assess a level of risk or a risk index, for which they set a maximum allowable value. This level of risk is a function of the fire load, the layout and the measures of active or passive protections, etc. The purpose of the risk methods is to jointly assess the installation and see whether NR< NR is eligible. Something similar establishes the UNE EN 1991-1-2 for calculating fire load. The characteristic fire load is the maximum value of what can be burned, although the calculation is the one that can be burned taking into account the facilities and certain risk factors and thus the structures are calculated in Europe.	
239	THE COMMUNITY OF MADRID FIRE BRIGADE	3. Characterisation of fire sectors and areas according to their intrinsic risk level (...) iii. The calorific value, qi, of each combustible material can be deduced from Table 1.3, or obtained from other sources of information, the use of which must be justified. (...)	3. Characterisation of fire sectors and areas according to their intrinsic risk level (...) III and vii The justification of these sections will be difficult, and will give rise to interested interpretations, there are several references to the choice of the 'most assimilable value' of a coefficient that are subject only to the responsibility of the project executor.	R. This paragraph opens the door to using safety coefficients, which means using higher (oversized) values in favour of security, which is requested to be justified in the text.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		vii. The calculation of Qs can be simplified by discarding non-representative materials from the formula due to their limited contribution to that value. In the event of such simplifications, in no case shall the calculated value of Qs deviate more than 10 % from the total from which it would be obtained if all discarded materials had been taken into account. In addition, in the event of not knowing the exact values of a certain material (Gi, qi) approximate estimates and safety coefficients may be used, provided that it is justified that the calculation obtained from Qs is equal to or higher than would be obtained if the exact values were used.		
240	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex I. Section 3.2.1. Page 43. In the following text: Calculating Qs from the combustibility data of the materials present, detail iv: Building elements and products that are part of the fire sector or area (such as those present on walls or ceilings) should also be deemed combustible materials and included in the calculation. The calculation of its calorific value can be carried out according to the system set out in standard UNE-EN ISO 1716, or, using other reference sources of recognised prestige, in a justified way. As an exception, if the construction element is separated from the interior of the sector by a fire-resistant layer	It does not seem so obvious that a product can be considered 'non-relevant' without having made a prior estimate. We recommend removing this concept. PROPOSAL: Building elements and products that are part of the fire sector or area (such as those present on walls or ceilings, and façades or roofs) should also be considered combustible materials (if, due to their fire response, they are not classified as non-fuel) and included in the calculation. The calculation of its calorific value can be carried out according to the system set out in standard UNE-EN ISO 1716, or, using other reference sources of recognised prestige, in a justified way. As an exception, in the event the building element is separated from the interior of the sector by a fire resistant layer at least EI 30 (in low or medium-risk fire sectors) and IS 60 (in high-risk fire sectors), this may not be counted in the calculation. In addition, it is not necessary to consider non-combustible building materials (e.g. concrete or steel).	R. The current text is correct and appropriate and should be read in conjunction with the whole section, which specifies which approximations and estimates can be accepted and which are not, in point vii.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		at least EI 30, it does not need to be counted in the calculation. In addition, it is not necessary to consider non-combustible building materials (e.g. concrete or steel) or those the fire load of which is not relevant compared to the total load of the sector.		
241	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex I Section 3.2.1. Page 44 paragraph vii In the event of not knowing the exact values of a given material (Gi, qi) approximate estimates and safety coefficients may be used, provided that it is justified that the calculation obtained from Qs is equal to or greater than what would be obtained if the exact values were used.	If the exact values are not known, it cannot be justified that the result is equal or higher. PROPOSAL: In the case of not knowing the exact values of a certain material (Gi, qi) approximate estimates and safety coefficients, can be used **provided that its use and provenance is justified**.	A. The wording of the sentence is changed to add this nuance.
242	AFELMA, Association of Spanish Insulating Mineral Wool Manufacturers	**Annex I, Section 3.2.1 – Calculating Qs from the combustibility data of the materials present, detail iv:** Building elements and products that are part of the fire sector or area (such as those present on walls or ceilings) should also be deemed combustible materials and included in the calculation. The calculation of its calorific value can be carried out according to the system set out in standard UNE-EN ISO 1716, or, using other reference sources of recognised prestige, in a justified way. As an exception, if the construction element is separated from the interior of the sector by a fire-resistant layer at least EI 30, it does not need to be counted in the calculation. In addition, it is not necessary to consider	It does not seem so obvious that a product can be considered 'non-relevant' without having made a prior estimate. We recommend removing this concept. In a complementary way, and in order to avoid interpretations, we propose clarifying that the envelope is actually included in the sector's NRI. A ceiling is not always interpreted as a roof, nor a wall as a façade. It is proposed the following final wording: *Building elements and products that are part of the fire sector or area (such as those present on walls or ceilings, **and façades or roofs**) should also be considered combustible materials **(if due to their fire response they are not classified as non-fuel)** and included in the calculation. The calculation of its calorific value can be carried out according to the system set out in standard UNE-EN ISO 1716, or, using other reference sources of recognised prestige, in a justified way. As an exception, in the event the building element is separated from the interior of the sector by a fire resistant layer at least EI 30 **(in low or medium-risk fire sectors) and IS 60***	R. On the comment to the first paragraph, the current text is correct and appropriate, and should be read in conjunction with the whole paragraph, which specifies which approximations and estimates can be accepted and which cannot. On the comment to the second paragraph, the current text was also correct and clear enough.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		non-combustible building materials (e.g. concrete or steel) or those the fire load of which is not relevant compared to the total load of the sector.	***(in high-risk fire sectors)**, this may not be counted in the calculation. In addition, it is not necessary to consider non-combustible building materials (e.g. concrete or steel) ~~or those the fire load of which is not relevant compared to the total load of the sector.~~*	
243	AFELMA, Association of Spanish Insulating Mineral Wool Manufacturers	**Annex I, Section 3.2.1 – Calculating Qs from the combustibility data of the materials present, detail vii:** The calculation of Qs can be simplified by discarding non-representative materials from the formula due to their limited contribution to that value. In the event of such simplifications, in no case shall the calculated value of Qs deviate more than 10 % from the total from which it would be obtained if all discarded materials had been taken into account. In addition, in the event of not knowing the exact values of a certain material (Gi, qi) approximate estimates and safety coefficients may be used, provided that it is justified that the calculation obtained from Qs is equal to or higher than would be obtained if the exact values were used.	Without having performed the calculation including them all, how can you know that it deviates more than 10 %? There is no point in these simplifications that will never err to the side of safety. So calculate it with all of them, since it was done at some point. It is proposed the following final wording: *~~The calculation of Qs can be simplified by discarding non-representative materials from the formula due to their limited contribution to that value. In the event of such simplifications, in no case shall the calculated value of Qs deviate more than 10 % from the total from which it would be obtained if all discarded materials had been taken into account. In addition~~, in the event of not knowing the exact values of a certain material (Gi, qi) approximate estimates and safety coefficients may be used, provided that it is justified that the calculation obtained from Qs is equal to or higher than would be obtained if the exact values were used.*	R. The text defines a methodology so that the calculation is feasible without making a disproportionate effort, and without having to add to the calculation materials that are present in minimum quantities that do not contribute anything relevant to the overall calculation. At the same time, the text requires the calculation to be sufficiently accurate.
244	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex I to the RSCIEI, section 3.2.1(7) 'A = constructed area of the fire sector or fire area, in square metres.'	Replace with 'A = constructed area of the fire sector or area of fire area, in square metres.'	A. The has been amended.
245	IPUR – Association of the Rigid Polyurethane Industry	**Annex I, Section 3.2.1 – Calculating Qs from the combustibility data of the materials present, detail iv:** Building elements and products that	The fire-response classification according to EN 13501-1 does not cover 'non-fuel' classifications if not A1, A2, B, C, D, E and F, in combination with information on smoke production and particulate fall. Within the classifications A1 and	R. The current text is correct and adequate. The use of the word 'incombustible' is clear enough. The proposal of the submission does not appear to

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		are part of the fire sector or area (such as those present on walls or ceilings) should also be deemed combustible materials and included in the calculation. The calculation of its calorific value can be carried out according to the system set out in standard UNE-EN ISO 1716, or, using other reference sources of recognised prestige, in a justified way. As an exception, if the construction element is separated from the interior of the sector by a fire-resistant layer at least EI 30, it does not need to be counted in the calculation. In addition, it is not necessary to consider non-combustible building materials (e.g. concrete or steel) or those the fire load of which is not relevant compared to the total load of the sector.	A2, there are products and materials that have fire load different than zero in both MJ/Kg and MJ/m² calculated according to EN 1716. Such a fire load must therefore be provided, regardless of the Euroclass to which they belong. On the other hand, fire resistant elements presenting fire load are ultimately compartmentalising elements. We agree with the current proposal of the regulator. **Text Proposed by IPUR**: Building elements and products that are part of the fire sector or area (such as those present on walls or ceilings, and façades or roofs) should also be deemed combustible materials and included in the calculation. The calculation of its calorific value can be carried out according to the system set out in standard UNE-EN ISO 1716, or, using other reference sources of recognised prestige, in a justified way. As an exception, if the construction element is separated from the interior of the sector by a fire-resistant layer of at least EI 30, it does not need to be counted in the calculation. In addition, it is not necessary to consider building materials with zero fire load, i.e. 0MJ/kg or 0MJ/m² (e.g. concrete or steel) or those the fire load of which is not relevant compared to the total load in the sector.	represent a significant alteration from the current text.
246	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex I. In point 3.2.1 on the 'Calculating Qs from the combustibility data of the materials present', in calculating calorific value in points IV and V, refers to the possibility of using renowned reference sources.	The sources of recognised prestige should be specified.	R. The current text is aligned with what is already stated in the previous regulations of 2004, which already opened the door to this option, without it being seen during these years in its application that a greater degree of detail is necessary in the drafting of this concept.
247	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex I. Section 3.2.2. In the following text. Building elements and products that are part of the fire sector or area (such as those present on walls or ceilings) should also be deemed combustible materials and included in the calculation. The calculation of its	In addition, and in order to avoid interpretations, we propose clarifying that the envelope is actually included in the proposal for a new regulation in the sector. A ceiling is not always interpreted as a roof, nor a wall as a façade. **PROPOSAL:** The value of Qs obtained must also be added to the fire load coming from the building elements and products, applying the expression in section 3.2.1 and the consid-	R. The current text is sufficiently clear on this aspect. No editorial changes are required.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		calorific value can be carried out according to the system set out in standard UNE-EN ISO 1716, or, using other reference sources of recognised prestige, in a justified way. As an exception, if the construction element is separated from the interior of the sector by a fire-resistant layer at least EI 30, it does not need to be counted in the calculation. In addition, it is not necessary to consider non-combustible building materials (e.g. concrete or steel) or those the fire load of which is not relevant compared to the total load of the sector.	erations cited in that. In the event that the construction element is separated from the interior of the sector by a fire resistant layer of at least EI 30 (in low or medium-risk fire sectors) and EI 60 (in high-risk fire sectors), this may not be accounted for in the calculation. In addition, it may be decided to rule out the fire load of the building elements in their entirety, if it is justified that the Qs obtained deviate less than 10 % from the total that would be obtained if they had been taken into account.	
248	European Fire Sprinkler Network	Annex I 3.2.2.i The values of the medium fire load density, qsi, can be obtained by reference to Table 1.5, where average values are displayed for certain common activities. When the qsi value of an activity does not appear, or the value appearing does not fit the specific case, the value of the most assimilable activity must be used, or, failing that, calculate its value on the basis of existing materials. In any event, it will be the responsibility of the project executor to ensure that the qsi values used are correct and conform to each specific situation and, where appropriate, to increase those values or to add the safety coefficients that are necessary to ensure that the calculation obtained will not be lower than the actual situ-	*The coefficients used to generate this data are not known to the project executor who makes the design, the selection of the table has to be accurate. If there is no way to compare directly with another component, reference should be made to the formula.* *Proposal for amendment:* *3.2.2.i* *The values of the medium fire load density, qsi, can be obtained by reference to Table 1.5, where average values are displayed for certain common activities. Where the qsi value of an activity does not appear, or the value that appears does not correspond with the specific case; this must be calculated based on existing materials. It will be the responsibility of the project executor to ensure that the qsi values used are correct and conform to each specific situation and, where appropriate, increase those values or add the corresponding safety coefficients.*	R. The current text is sufficiently clear and seeks to make the calculation in this way a real possibility and not something impossible or disproportionate. No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ation of the establishment.		
249	European Fire Sprinkler Network	Annex I 3.2.2. iii. For the surface-area value If of the activities, the extent of the different combustible materials, machinery, equipment, collections, furniture, etc. that the sector or fire area will contain, under maximum production conditions, should be considered. This must be accompanied by plans for the distribution layout of the areas and surface areas of the activities. On the other hand, stockpiles, warehouses of materials or products assembled for maintaining production processes of assembly, processing or repair, or resulting from these, the consumption or production of which is daily and constitute the so-called 'day store', shall not be counted separately. These materials or products shall be deemed incorporated into the activity to which they are to be applied or from where they originate.	*The VKF document did not intend to exclude the 'day store' from the process, therefore, it should be included in the calculations and not deleted. New products that were stored on pallets arrive at the lines daily. Although storage can be moved and taking into account in the analysis; in the event of potential fire risk, the expected conditions within the building should be considered at any time and accounted for. Even small parts of these materials can have a major impact on the fire's escalation, as evidenced by the definition of the R coefficient.* *Proposal for amendment:* *3.2.2.iii* *For the surface-area value If of the activities, the extent of the different combustible materials, machinery, equipment, collections, furniture, etc. that the sector or fire area will contain, under maximum production conditions, should be considered. This must be accompanied by plans for the distribution layout of the areas and surface areas of the activities. Stockpiles, deposits of materials or products assembled for maintaining production processes of assembly, processing or repair, or resulting from these, the consumption or production of which is daily and constitute the so-called 'day store'.*	R. The 'day store' is a concept that is explained in Annex I for a very specific case and that makes sense that it is included in the activity itself, as it is part of it.
250	European Fire Sprinkler Network	Annex I 3.2.2. iv In total, considering all of the areas, the sum of surface areas in each area (-Si) should be equal to A. If there are large open areas (empty, no activity and no fire load), these areas may be considered separately in the summation as areas without fire load (qsi=0). (Note: Picking areas, loading docks or similar areas where there may be regular fire loads, should be	Large, empty areas might mean a decrease in the density of the fire load if one decides to make an average of the total surface area. You could have a small warehouse located on a small part of this large area with a high fire load that, divided by the total surface area, would end up being non-existent; resulting in a low risk. Such areas should be excluded from the calculation. Proposal for amendment: 3.2.2. iv In total, considering all zones, the sum of surfaces of each area (-Si) should be equal to A. If there are large open areas (empty, no activity and no fire load) these will *not be taken*	R. The current text is sufficiently precise for achieving the objective sought, which is to be able to classify sectors or areas at a certain level. Introducing additional complications to the calculation is not justified and will not lead to an improvement in the objective. Nor should it be deemed that there is a charge of fire where it is not present, nor to increase the value of the calculation artificially.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		deemed areas with activity).	*into account in the calculation. Otherwise, it would have to be assumed that they have a fire load equal to that of the fire sector, in order to avoid distorting the result of the actual fire load.* (Note: Picking areas, loading docks or similar areas where there may be regular fire loads, should be deemed areas with activity).	
251	European Fire Sprinkler Network	Annex I 3.2.2.v The value of Qs obtained must also be added to the fire load coming from the building elements and products, applying the expression in section 3.2.1 and the considerations cited in that. In the event the construction element is separated from the interior of the sector by a fire-resistant layer of at least EI 30, it does not need to be counted in the calculation. In addition, it may be decided to rule out the fire load of the building elements in their entirety, if it is justified that the Qs obtained deviate less than 10 % from the total that would be obtained if they had been taken into account.	An experienced project executor should understand the values of building elements and products and judge their contribution. However, there should be a qualification for carrying out this calculation. If building materials are the difference between low and medium or medium and high risk, these should be included. 10 % could be important in these cases. A qualification is necessary. We could deviate, but without this changing the outcome. For example, if we are at Medium Risk 3 and this 10 % could lead us to a Low Risk 2, this should not be allowed. Proposal for amendment: Annex I 3.2.2.v The value of Qs obtained must also be added to the fire load coming from the building elements and products, applying the expression in section 3.2.1 and the considerations cited in that. In the event the construction element is separated from the interior of the sector by a fire-resistant layer of at least EI 30, it does not need to be counted in the calculation. In addition, it may be decided to rule out the fire load of the building elements in their entirety, if it is justified that the Qs obtained deviate less than 10 % from the total that would be obtained if these had been taken into consideration, provided that this does not alter the intrinsic level of risk from high to medium to medium to low.	R. On the one hand, it is not appropriate to speak in this annex about the qualification of the project executor. On the other hand, the text defines a methodology so that the calculation is feasible without making a disproportionate effort, and without having to add to the calculation materials that are present in minimum quantities that do not contribute anything to the overall calculation. At the same time, the text requires the calculation to be sufficiently accurate.
252	AFELMA, Association of Spanish Insulating Mineral Wool Manufacturers	**Annex I, Section 3.2.2 – Calculating Qs from fire load density data of areas with manufacturing activities, detail v:** The value of Qs obtained must also be added to the fire load coming from the building elements and prod-	Without having performed the calculation including all of them, how can you know that it deviates by more than 10 %? There is no point in these simplifications that will never err to the side of safety. So calculate it with all of them, since it was done at some point. It is proposed the following final wording: *The value of Qs obtained must also be added to the fire load*	R. The text defines a methodology so that the calculation is feasible without making a disproportionate effort, and without having to add to the calculation materials that are present in minimum quantities that contribute nothing to the overall calculation. At the same time,

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ucts, applying the expression in section 3.2.1 and the considerations cited in that. In the event the construction element is separated from the interior of the sector by a fire-resistant layer of at least EI 30, it does not need to be counted in the calculation. In addition, it may be decided to rule out the fire load of the building elements in their entirety, if it is justified that the Qs obtained deviate less than 10 % from the total that would be obtained if they had been taken into account.	*coming from the building elements and products, applying the expression in section 3.2.1 and the considerations cited in that. In the event that the construction element is separated from the interior of the sector by a fire resistant layer of at least EI 30* ***(in low or medium-risk fire sectors) and EI 60 (in high-risk fire sectors)****, this may not be accounted for in the calculation.* ~~*In addition, it may be decided to rule out the fire load of the building elements in their entirety, if it is justified that the Qs obtained deviate less than 10 % from the total that would be obtained if they had been taken into account.*~~	the text requires the calculation to be sufficiently accurate.
253	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex I to the RSCIEI, section 3.2.2, title '3.2.2. Calculating Qs based on fire load density data from areas with manufacturing activities.'	Replace with '3.2.2. Calculating Qs based on fire load density data for areas with manufacturing activities and similar processes' as described in section 3.2 of the same Annex.	R. The current text is sufficiently clear, and details are explained within each of the sections.
254	IPUR – Association of the Rigid Polyurethane Industry	**Annex I, Section 3.2.2 – Calculating Qs from fire load density data of areas with manufacturing activities, detail v:** The value of Qs obtained must also be added to the fire load coming from the building elements and products, applying the expression in section 3.2.1 and the considerations cited in that. In the event the construction element is separated from the interior of the sector by a fire-resistant layer of at least EI 30, it does not need to be counted in the calculation. In addition, it may be decided to rule out the fire load of the build-	We deem the current proposal of the regulator appropriate.	C. The submission is a comment that does not include proposals.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ing elements in their entirety, if it is justified that the Qs obtained deviate less than 10 % from the total that would be obtained if they had been taken into account.		
255	Professional Association of Fire Technicians (APTB)	ANNEX I 3.2.2. Calculating Q_s from fire load density data from areas with manufacturing activities. Details to consider: *The values of the medium fire load density, q_{si}, can be obtained by reference to Table 1.5, where average values are displayed for certain common activities. When the q_{si} value of an activity does not appear, or the value appearing does not fit the specific case, the value of the most assimilable activity must be used, or, failing that, calculate its value on the basis of existing materials.* **In any event, it will be the responsibility of the project executor to ensure that the q_{SI} values used are correct and conform to each specific situation and, where appropriate, to increase those values or to add the safety coefficients that are necessary to ensure that the calculation obtained will not be lower than the actual situation of the establishment.**	How can you ensure and guarantee that the calculation obtained from an industrial activity, which is not included in Table 1.5, **will not be lower than the actual situation of the establishment**? We cannot know the actual situation of the establishment because we would not know the data of its fire load, and if we knew it, it would not be necessary to assimilate anything. On the other hand, to say that, if the activity does not appear in Table 1.5, the fire load density should be calculated through the existing materials is pure demagogy. How many materials can there be in a plumbing warehouse, or in an electrical or electronic equipment warehouse, office supplies, in a laundry or dry cleaner, in a bus garage, in a drug store, etc., activities not included in Table 1.5? It would be impossible, and unrealistic, to perform the calculation by the combustibility of the materials present. Moreover, how are the **security coefficients determined** indicated in the paragraph?	R. The current text is sufficiently clear and seeks to make the calculation in this way a real possibility and not something impossible or disproportionate. Therefore, there are several possibilities for each specific case, for the project executor to choose and justify how he performs the calculation.
256	Professional Association of Fire Technicians (APTB)	ANNEX I 3.2.2. Calculating Q_s from fire load density data from areas with manufacturing activities. Details to consider: For the surface-area value If of the activities, the extent of the different	In relation to the materials of the 'day store', it may be the case that the materials come from the warehouse of the industry itself, it should not be considered in calculating the fire load, because they are already considered in calculating the fire load of the warehouse, but it could be the case that the materials came from outside, or from another sector, then having to be taken into account in calculating the	R. The proposed text does not go into determining the origin of these materials, but simply establishes a methodology that is intended to be both accurate and feasible to use.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		combustible materials, machinery, equipment, collections, furniture, etc. that the sector or fire area will contain, under maximum production conditions, should be considered. This must be accompanied by plans for the distribution layout of the areas and surface areas of the activities. ***On the other hand, stockpiles, warehouses of materials or products assembled for maintaining production processes of assembly, processing or repair, or resulting from these, the consumption or production of which is daily and constitute the so-called 'day store', shall not be counted separately. These materials or products shall be deemed incorporated into the activity to which they are to be applied or from where they originate.***	weighted and corrected fire load of the manufacturing activity.	
257	APICI	Annex I 3.2.2.i The values of the medium fire load density, qsi, can be obtained by reference to Table 1.5, where average values are displayed for certain common activities. When the qsi value of an activity does not appear, or the value appearing does not fit the specific case, the value of the most assimilable activity must be used, or, failing that, calculate its value on the basis of existing materials. In any event, it will be the responsibility of the project executor to ensure that the qsi values used are correct and conform to each specific situation	The coefficients used to generate this data are not known to the project executor who makes the design, the selection of the table has to be accurate. If there is no way to compare directly with another component, reference should be made to the formula. Proposal for amendment: 3.2.2.i The values of the medium fire load density, qsi, can be obtained by reference to Table 1.5, where average values are displayed for certain common activities. Where the qsi value of an activity does not appear, or the value that appears does not correspond with the specific case; this must be calculated based on existing materials. It will be the responsibility of the project executor to ensure that the qsi values used are correct and conform to each specific situation and, where appropriate, increase those values or add the corresponding safety coefficients.	R. The current text is sufficiently clear and seeks to make the calculation in this way a real possibility and not something impossible or disproportionate. Therefore, there are several possibilities for each specific case, for the project executor to choose and justify how he performs the calculation.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		and, where appropriate, to increase those values or to add the safety coefficients that are necessary to ensure that the calculation obtained will not be lower than the actual situation of the establishment.		
258	European Fire Sprinkler Network	Annex I 3.2.3 ii. The surface area. If it corresponds to the surface area of the warehouse, including the space where the stored products are physically located (shelves, etc.). Depending on whether or not the surface area includes the surface of the adjacent corridors that may exist, necessary for the performance of the storage activity, the corresponding QVI value must be chosen in Table 1.5: QVI 'gross storage' if it includes adjacent aisles, or QVI 'net storage' if it does not include adjacent aisles.	To be consistent with the following chapters in storage (Annex IV 2.2 e.), it should be clarified that this area includes work areas in mezzanines, intermediate levels and platforms. Proposal for amendment: Annex I, 3.2.3 ii. The surface area. If it corresponds to the surface of the warehouse, including the space where the stored products are physically located (mezzanines, intermediate floors, platforms, shelves, etc.). Depending on whether or not the surface area includes the surface of the adjacent corridors that may exist, necessary for the performance of the storage activity, the corresponding QVI value must be chosen in Table 1.5: QVI 'gross storage' if it includes adjacent aisles, or QVI 'net storage' if it does not include adjacent aisles.	R. The current text is clear enough. The clarifications to be made in specific situations in Annex IV are already explained in Annex IV itself. On the other hand, as far as this point of Annex I is concerned, it is not the same as with regard to Annex IV.
259	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex I to the RSCIEI, section 3.2.3, subsection i 'i. The values of the fire load per cubic metre, qvi, provided by each of the fuels, can be obtained by reference to Table 1.5. When the value of qvi does not appear, or the value that appears does not fit the specific case, the most assimilable value must be used or, failing that, calculate its value on the basis of existing materials. In any event, it will be the responsibility of the project executor to ensure that the qvi values used are correct and conform to each specific situation and, where appropri-	Where it states 'The values of the fire load per cubic metre, qvi, provided by each of the fuels, can be obtained by reference to Table 1.5.' replace with 'The values of the medium fire load density, qvi, can be obtained by reference to Table 1.5, which shows average values for certain common storage activities.', in line with the wording of section 3.2.2(i) of the same annex.	R. The text is sufficiently clear. It is not thought that adding more text at this point will improve the comprehension of the text to the reader.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ate, to increase those values or to add the safety coefficients that are necessary to ensure that the calculation obtained will not be lower than the actual situation of the establishment. In addition, the maximum number of storage units envisaged (e.g. pallets) must be indicated and accompanied by plans of the distribution in plant of the storage areas and areas and sections reflecting the maximum storage heights.'		
260	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex I to the RSCIEI, section 3.2.3(vi) 'vi. The weighting coefficient Ci shall be applied to each area with different activity and its value is obtained from Table 1.5.'	Replace with 'vi. In this expression, the weighting coefficient Ci shall be applied to each area with different types of storage. and its value is obtained from Table 1.5. in line with the wording of section 3.2.2.(ii) of the same Annex.	A. The phrase is changed and the numbering error corrected.
261	IPUR – Association of the Rigid Polyurethane Industry	Annex I, Section 3.2.3 – Calculating Qs from fire load density data of storage areas, detail iv: The value of Qs obtained must also be added to the fire load coming from the building elements and products, applying the expression in section 3.2.1 and the considerations cited in that. In the event the construction element is separated from the interior of the sector by a fire-resistant layer of at least EI 30, it does not need to be counted in the calculation. In addition, it may be decided to rule out the fire load of the building elements in their entirety, if it is justified that the Qs obtained deviate less than 10 % from the total that	We deem the current proposal of the regulator appropriate.	C. The submission is a comment that does not include specific proposals.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		would be obtained if they had been taken into account.		
262	SFPE Spain	Annex I, Article 3.2.3, Details to consider: i	Nothing is indicated about packaging materials. are the values indicated in Table 1.5 included? or is it necessary to add the load provided by the packaging, in a similar way to what is indicated in Annex I, Article 3.2.1 Details to be considered, '*... also considering packaging and transport materials, such as encapsulated protective plastics, cardboard or pallets of wood or plastic, as well as combustible furniture. In these cases, should the quantity of each be calculated.*'?	R. Table 1.5 includes average activity values. The calculation to be performed is specified perfectly in the text. It is not appropriate at this point to request additional charges to be added to the calculated value.
263	SFPE Spain	Annex I, Article 3.2.4.3, 3.2.4.3. Alternatively to the above methods, the use of other assessment methods of recognised prestige can also be used for calculating intrinsic risk. In such cases, the method used must be justified in the project.	Since the list is less exhaustive than that of Royal Decree 2267/04 (which was already limited). can values be used in Annex I 'Thermal loads of fittings' in Table 1.2 of 'dt CEPREVEN – Fire Risk Assessment Method - Gretener'?	C. The lists provided in the proposed regulation contain a number of materials and activities. It is expected that those placed there, or any other of the options included in Annex I, will be used. Whether or not other data sources can be used is already clarified in each of the sections of Annex I.
264	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex I. In point 3.2.4. on the 'Calculating Qs combining several of the above methods' in Section 3.2.4.3, which refers to 'Alternatively to the above methods, the use of other assessment methods of recognised prestige can also be used for calculating intrinsic risk'	The assessment methods of recognised prestige should be specified.	R. The current text is aligned with what is already stated in the previous regulation, which is sufficiently concise. Further clarifications are not deemed necessary, but if they were, they could be included in the implementation guides.
265	STATE AGENCY FOR RAILWAY SAFETY	Annex I Table 1.2	In the table, is the value of the Ci in hazard grade 4 and 5 the same?	C. The values of Ci are what are placed in the table (it is not an error).
266	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex I. Table 1.2. Page 48	Cardboard appears as an example of solids with a hazard grade of 3 and 4. PROPOSAL: Confirm the appropriate grade. It is understood to be 3 like other cellulosics	A. The table has been amended to differentiate the value according to whether it is compacted or non-compacted (it will be 3 or 4 depending on the case).
267	particular	ANNEX I CHARACTERISATION OF INDUSTRIAL ESTABLISHMENTS	Annex D to Document *Evaluation en vue de la détermination de la grandeur des compartiments coupe-feu Justificatif de sécurité pour affectations industrielles et artisanales - Méth-*	A. The product has been removed from the list, as it is a rare product. The project executor may justify the value

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		Table 1.3. CALORIFIC VALUES OF VARIOUS SUBSTANCES (q) Hydrogen sulphide or hydro sulphide: 48.54 (MJ/kg)	*ode de calcul* – of the VKF – AEAI, also known as an update of SIA 81 in Switzerland or update of the 2007 Gretener Method, shows a fire load value of 15.12 MJ/kg 'Acide sulfhydrique', which represents a huge variation from the value included in Table 1.3. Similarly, Table 3.1 of document *Erhebung von Brandlastdaten in Industrie und Gewerbebetrieben* (ETH-2351-01) of the Swiss Federal Institute of Technology in Zurich establishes for the fire load of 'Schwefelwasserstoff' the value of 15.1 MJ/kg. It is proposed to remove the product from the table, provided this difference is clarified: Hydrogen sulphide or hydro sulphide: 48.54 (MJ/kg)	he uses in each individual case.
268	particular	**Annex I RSCIEI**, section 3.2.1., **Table 1.3.** calorific value values of various substances (q)	In order to be able to calculate the fire load, the calorific value values of meat and fish are missing in Table 1.3. Include in Table 1.3.: Material: Fresh whole tuna/q: 4.98 MJ/kg / C_i: 1.30 Material: Cooked tuna/q: 5.02 MJ/kg / C_i: 1.30 Material: Dried meat/q: 25.10 MJ/kg / C_i: 1.20	R. It is not appropriate to place such detailed values, or else the list would have thousands of rows and would be never-ending. If you want to use such detailed data, these values can be calculated by the project executor on a case-by-case basis.
269	CEPREVEN	Table 1.3. Note 5: A value of 1 can be taken if it is justified that these are compact pieces of large dimensions.	It is not specified that *large dimensions* are considered, which can lead to different interpretations.	R. The note is intended to be only explanatory and with general guidance. The definitive values taken must be justified by the project executor.
270	CEPREVEN	Table 1.3.	It is suggested to incorporate the substance 'Composted or biostabilised organic material', with a calorific value around 10.22 MJ/kg and Ci= 1.3	R. It is understood that this activity is not representative enough to be on the list, however, the fact that it is not included does not mean that this value cannot be used: The regulation opens the door for project executors to use the values calculated by themselves for specific cases, as seems to be the case in this particular case.
271	Professional Association of Fire Technicians (APTB)	Annex I Table 1.3. Wooden pallets ... 369.60 MJ/unit.	There are two kinds of wooden pallets of standard measurements, the European of 800 x 1 200 mm, and the American of 1000 x 1 200 mm. Both are often used in our warehouses. The calorific value indicated in the table is assumed to correspond to the European one, but it should be clarified.	A. Clarification has been added to the text.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
272	KREAN S.COOP	ANNEX I Table 1.3.	The fire load units used are MJ/Kg Include Mcal/Kg	R. The units in the table are correct and sufficient. Adding others is unnecessary.
273	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex I. Table 1.4. Page 54	The proposed calculation makes most of the storage and almost all logistics high risk 8, regardless of the combustibility of the stored products, which has no technical justification. In reality, a manufacturing establishment may have more risk, with hardly any active protection systems and not much fuel, apart from a fuel product warehouse equipped with an extinguishing system that is able to control the fire. **PROPOSAL:** Review the application of the table with real cases before its final publication.	A. The 'R' calculation table is modified so as not to penalise warehouses as much. However, the final result will depend to a greater extent on the materials that have been stored.
274	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex 1, Table 1.4	Add the appropriate R value for storage of combustible materials **at a temperature below 4ºC** (or the most appropriate temperature to be determined for refrigerated and frozen products)	R. It is understood that changing the value of R for this situation would be inappropriate. That a material is more or less cold is not related to the probability of a fire starting, but rather to the energy that must be provided to reach the flash point.
275	CEPREVEN	Table 1.4. R will be 1.8 where the two situations (a) and (b) referred to in the top row are fulfilled simultaneously, or where the following situation is met: *Existence of combustible-materials storage of a height of more than 5 m, which occupy a surface area equal to or greater than 150 m^2. For the purpose of determining this surface area, it is not necessary to take into account storage of lower surfaces, separated by means of a free space around them not less than 5 m, or with compartmentalising elements of resistance EI 30 or greater.*	It is suggested to incorporate the word net, in relation to storage height: 'R shall be 1,8 where the two situations (a) and (b) referred to in the top row are fulfilled simultaneously, or where the following situation is met: *Existence of fuel material storages of **net** height greater than 5 m, which occupy a floor surface equal to or greater than 150 m^2. For the purpose of determining this surface area, it is not necessary to take into account storage of lower surfaces, separated by means of a free space around them not less than 5 m, or with compartmentalising elements of resistance EI 30 or greater.* '	R. It is not necessary to mention that it is net (which, at the same time, would require adding another definition indicating what this word means). Therefore, it is thought that the text is clear enough for the reader with the current wording, and that adding more words would no longer clarify the text that already exists.
276	Professional Association of Fire Technicians	Annex I Table 1.4. Criteria for determining the value of	The current Regulation states that: 'Where there are several activities in the same sector, the activation risk factor inherent in the activity with the highest	R. Table 1.4 has been added to the previous regulation, which was otherwise structured. In this way, the new text

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	(APTB)	the coefficient 'R' of a fire sector or area.	risk of activation shall be taken, provided that activity occupies at least 10 % of the area of the sector or fire area'. The draft does not indicate anything about this possibility.	does not need to detail this matter.
277	particular	Annex I Table 1.5.	The current table is much smaller than the previous table. For example, it is not possible to locate the equivalent of '*Data processing, computer room*' collected in the 2004 RSCIE. It is curious when in Annex II (page 12 of 15) it is mentioned in point '*7.5 Fixed extinguishing systems by gaseous extinguishing agents*' that they will be installed in enclosures with '*electronic equipment, calculation centres, data banks, control or measurement centres and similar*'	R. It is not possible to place such detailed data. In these cases, the project executor can choose to make a detailed calculation according to the equipment that houses the place, which can vary greatly.
278	particular	ANNEX I CHARACTERISATION OF INDUSTRIAL ESTABLISHMENTS Table 1.5. AVERAGE LOAD-DENSITY VALUES OF MANUFACTURING ACTIVITIES (q_s), OF STORAGE (q_v) AND ITS ASSOCIATE COEFFICIENTS (C_i, R_{min})	It is proposed to add the following activities and fire loads per m^2 (q_s): Cinema: 300 MJ/m^2 Pharmacy (including warehouse): 800 MJ/m^2 Jewellery: 300 MJ/m^2 Toy shop: 500 MJ/m^2 Laundry: 200 MJ/m^2 Book shop: 1,000 MJ/m^2 Bakery, sale: 300 MJ/m^2 Stationery, sale of items: 700 MJ/m^2 Perfumery, sale: 400 MJ/m^2 Restaurant: 300 MJ/m^2 Dry cleaning: 300 MJ/m^2 Sale of electrical or electronic equipment: 400 MJ/m^2 Sale of sporting goods: 800 MJ/m^2 Sale of prams for children: 300 MJ/m^2 Sale of sweets: 400 MJ/m^2 Sale of household appliances: 300 MJ/m^2 Sale of furniture: 500 MJ/m^2 Sale of clothing items: 600 MJ/m^2 Shoe shop: 500 MJ/m^2 **Reason**: these fire loads are common in establishments and shopping centres regulated by the DB SI. The need or otherwise for an automatic extinguishing system according to Table 1.1 of Part SI 4 of the DB SI requires determining the fire load density of the fire sector. Until now, this calculation	A. Added as a reference in the aforementioned table.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			was carried out with Table 1.2 of the RSCIEI, but in the new RSCIEI these frequent values do not appear. On the other hand, these values are proposed because they are those currently listed in Table 1.2 of the RSCIEI, except for dry cleaning. They have been contrasted with the 1986 CIB W14 Table, with the only alteration of the value for dry cleaners. The coefficients C_i y R_{min} are not specified. They can be determined by Table 1.2 and Table 1.4 of the new RSCIEI in the opinion of the project executor, or include the most likely by assimilation to similar activities. Another option and include the table in the DB SI, since it is the Regulation that will give utility to these values.	
279	particular	ANNEX I CHARACTERISATION OF INDUSTRIAL ESTABLISHMENTS Table 1.5. AVERAGE LOAD-DENSITY VALUES OF MANUFACTURING ACTIVITIES (q_s), OF STORAGE (q_v) AND ITS ASSOCIATE COEFFICIENTS (C_i, R_{min})	It is proposed to add the following storages and fire loads per m^3 (q_v): Stationery items: 1,100 MJ/m^3 Perfumery items: 500 MJ/m^3 Rubber items: 5,000 MJ/m^3 Alcoholic beverages, sale: 800 MJ/m^3 Library 2,000 MJ/m^3 Bicycles: 400 MJ/m^3 Footwear: 400 MJ/m^3 Candy: 1,500 MJ/m^3 Cartonage: 2,500 MJ/m^3 Frozen: 372 MJ/m^3 Preserved products 372 MJ/m^3 Cosmetics: 500 MJ/m^3 Compact discs and the like: 3,400 MJ/m^3 Artificial flowers: 200 MJ/m^3 Toys 800 MJ/m^3 Office equipment: 1,300 MJ/m^3 **Reason**: these fire loads are common in the warehouses of commercial establishments regulated by the DB SI. The classification of warehouses as special risk premises according to Table 2.1 of Part SI 1 of DB SI requires determining the fire load density of these enclosures. Until now this calculation was carried out with table 1.2 of the RSCIEI, but in the new RSCIEI these frequent values do not appear, except ap-	A. Added as a reference in the aforementioned table.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			pliances, fabrics and clothing, synthetic foam mattresses, pharmaceuticals and various foodstuffs. The values indicated are those of the 2004 RSCIEI: since no more up-to-date values have been found, they can be included with a note setting out this particularity: use of these values provided more current ones are not available. As in the previous proposal, it is possible to include this in the new RSCIEI or the DB SI, considering that the use corresponds to the latter.	
280	particular	Annex I RSCIEI, section 3.2.2., Table 1.5. Average fire load density values of manufacturing activities (q_s), storage (q_v) and its associated coefficients (C_i, R_{min})	To count the values of fire load density to boiler rooms, C.G.B.T. or processing centres is missing in Table 1.5. the reference to these activities, so characteristic in industrial buildings. Include in the production column of Table 1.5.: Transformer station q_s: 300 (MJ/m^2)/ C_i: 1.20/ R_{min}:1,4 Boiler buildings: q_s: 200 (MJ/m^2)/ C_i: 1.00/ R_{min}:1.00 Electrical appliances: q_s: 400 (MJ/m^2)/ C_i: 1.00/ R_{min}:1.00	R. These types of sites already have their specific regulations, and so it is not appropriate to add them to the list of these regulations.
281	IETcc	ANNEX I. Table 1.5	Some products have disappeared, compared to the current RSCIEI tables. This might cause problems in determining the fire load and fire load density of some industrial establishments and other buildings that use these tables as a reference. For example, they are the reference indicated in the DBSI to determine the fire load density of the warehouses in commercial use, and based on this parameter classify the warehouse as low, medium or high spatial risk premises.	A. Added as a reference in the aforementioned table. (Already analysed in other submissions).
282	FEDAOC	Annex 1, Table 1.5.	This table is much more incomplete than the one included in RD 2267/2004, apart from providing certain incongruous Rmin coefficients. It is suggested to continue applying Table 1.2 of Annex I to Royal Decree 2267/2004.	R. The tables in Annex I have been changed, as the need to update the 2004 values has been identified. After the last review, no inconsistent coefficients have been identified.
283	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex I. Table 1.5. Page 55.	Contradictions in Ci values: C_i = 1.44 in offices and meeting rooms, C_i = 1.2 in files, paper store, C_i = 1.00 in cellulose warehouse, C_i = 1.20 cellulose in Table 1.2. The most consistent value would be 1.2. Very different values for risks that seem the same: Corrugated Cardboard/Carton Factory (Alm. in paper coils q_v net 14,700 MJ/m^3) - Printing (Alm. paper and reels q_v net 6200 MJ/ m^3), Flour storage 5,000 MJ/m^3) – (Bakery and pastry	PA. On Ci and q: The combustibility of the materials varies depending on their distribution (compacting, storage method, etc.). These values therefore change in each case and the tables collect them in this way. On 'domestic products', this reference is removed from the table, which seems to

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			products-Alm. of raw materials 2,800 MJ/m ^{3}), What can the heading 'domestic products' include to be >5 times the others? Food industry: Storage of non-alcoholic beverages. For Ra penalties, it goes from low NRI 2 to high 6. A store for bottles of water or beer would have a high risk 6, which makes no sense. Data on common products is missing. Beverages with alcohol or frozen foods. How would they be treated? In France, following the entry into force of the Flumilog method for testing fuel pallets, these pallets are classified as non-combustible or have a q^{v} less than 300MJ/m^3 Logistics: All current logistics establishments are NRI Medium 5, with the new tables now rising with the Ra penalty for storage and the generic value of q_v. This will mean that almost all establishments built in recent years need an exception and the authorisation of Industry of the Autonomous Communities every time they change industrial or have a substantial alteration. All new ones cannot be built in buildings type A_H or B, even if they justify that they do not harm third parties, with the economic impact that this implies. PROPOSAL: Rethinking the application of the table with real cases before its final publication and assessing the economic impact. It does not appear that many of the values are consistent, and some contradict full-scale fire test results. There is no evidence that the values have been the result of scientific analysis, and are insufficient and inadequate for a large number of activities.	confuse more than help (referring to cleaning products). On the R values, the table is adapted so that it does not disproportionately penalise certain cases. On the list of activities and the headings (existing or missing), a new one has been added in line with what appears in the previous regulation and that it is deemed appropriate to include; however, it is recalled that it is impossible to place a complete list of all the activities and that the project executor can use several alternative ways to carry out the calculations. Similarly, if the project executor has more accurate values than those in the table for specific use, they can also be used. On logistics warehouses, the value it places with an interval is nuanced, and an explanatory note has been added.
284	ANDIMAT (National Association of Insulating Material Manufacturers)	Table 1.5.	There are multiple values in the table that refer to polystyrene, without specifying what process or final material this refers to. There are different types of raw materials, and processes that are not correctly distinguished. Polymer types are also not specified in 'synthetic foams', where polystyrene can also be included. This might lead to confusion for the user of the Regulation, and therefore to incorrect calculations. Proposed changes: Building materials: **Change:** "~~Fuel insulation materials (poly-~~	PA. References are partially changed to make them more precise, but nevertheless these cannot a priori be extended to other similar materials, or change the materials to which it refers. It should be up to the project executor to assess whether a particular material fits the value suggested in the table or not (for this purpose Annex I gives several ways

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			~~styrene)'~~ **with** 'synthetic insulation materials' **Reason:** Insulators can be of different polymers and manufacturing techniques: PU, EPS, XPS, PIR, PU, EE, etc. In synthetic materials: **Change**: '~~Polystyrene (cut) and polystyrene, storage~~' **with** 'foamed polystyrene (cut) and foamed polystyrene (storage). **Reason:** clarification. In rigid foam panels: Specify which polymer of synthetic panels is referred to, both in production and storage of finished product because they may have other different characteristics. **Change:** the coefficients indicated above from '~~1.44~~ ' **with** '1.2' as specified in Table 1.2. **Reason:** In Table 1.2, polystyrene is assigned 1 or 1.20 as a combustibility hazard coefficient (Ci) in Table 1.5 it is assigned 1.44 in all cases.	of performing and justifying the calculations). Concerning the Ci tables, they change according to the concrete material. It has been added that polystyrene (foam) has a value of 1.44 for its characteristics.
285	Subdirectorate-General for Industry, Government of Valencia	ANNEX I - CHARACTERISATION OF INDUSTRIAL ESTABLISHMENTS Table 1.5. AVERAGE DENSITY VALUES FOR FIRE OF MANUFACTURING ACTIVITIES (qs), STORAGE (qs) AND THEIR ASSOCIATE COEFFICIENTS (Ci, Rmin)	It would be necessary to include the product mainly produced in Castellón in the construction materials section: Ceramic flooring and cladding; in both the production and storage sections. The storage section will take into account that these are non-combustible products packed with cardboard boxes, and plastic strapping, on wooden pallets. In the chemical industry section, storing flammable products in general, not only epoxy resins as it appears, should be differentiated from storing non-flammable products. It should mention the existence of sector-specific regulations. A section for the pyrotechnics and explosives manufacturing industries needs to be included. It is not clear whether the value of fire load density per activity is quantified by the fire load that can be added to the establishment due to the existence of administrative areas of less than 250 m^2, or the existence of small storage areas.	R. In the tables it is impossible to cite all existing activities. Only a few (the most representative) are cited, and the project executor is responsible for searching for the one that best fits, or using another of the multiple possibilities offered by Annex I to perform the calculation.
286	European Fire Sprinkler Network	Annex I Table 1.5 AVERAGE FIRE LOAD DENSITY VALUES OF MANUFACTURING ACTIVITIES (qs), STORAGE (qv)	*These numbers come from the 2007 VKF document 115-03d table. This study is based on the 2005 Swiss study, examining 95 plants. Observations are made on an established number of samples.* *Proposal for amendment:*	PA. The name of the first heading quoted is changed to 'meeting/conference rooms'. A range of values has been added to the paper. It expands and corrects the automobile manufacture list

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			Part A. In Offices, the lower value of Qs is described in the original document as Conference Room. It should be Conference Room – 300 MJ/m² *Part B. Cardboard. In Paper Factory: Production Transformation. The Swiss refer to a Paper Mill. This is important, as paper production includes the transition from wet to dry processes. Producing and cutting traditional paper and transforming it should be treated differently in the table. Orient this value more towards the production and processing of cardboard 1500.* *Part F. Miscellaneous materials and goods – Building materials such as bricks and concrete have a higher load than elements in section H of Metal Transformation.* *Part H. Metal Transformation – Automobile manufacturing. This entire line in the VKF document refers to the construction of armoured and commercial vehicles and not utility vehicles and should have a different description; for example: Manufacture of Special Vehicles to establish a distinction with the assembly/automated manufacture of utility vehicles.* *H. In Metal Construction – Production, galvanisation has fallen from 1 000 MJ/m² to 250 MJ/m². There is no reason to understand that this industry has reduced its risk. Evidence in France indicates otherwise. Reset previous value, this being 1 000 MJ/m².*	and details more. Regarding the rest of the comments, it is understood that the current text is correct. On galvanising, it should be noted that the 2004 Regulation identified Galvanoplasty as 200 MJ/m². (not 1,000), so the proposed value is consistent.
287	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex I, Table 1.5	Add fire load density values from activities that were missing and previously were there, such as warehouses and other alcoholic beverages, electronics, frozen, waste, drug stores, medicines, etc., or, in view of this absence, indicate whether it is possible to continue using the old tables. Update values (such as manufacture of cables, also taking into account the manufacture of halogenated cables)	PA. Some new frequent activity has been added to the list, based on those that appeared in the previous regulation. In any event, in the tables it is not feasible to cite all possible activities. Only a few (the most representative) are cited, and the project executor is responsible for searching for the one that best fits, or using another of the multiple possibilities offered by Annex I to perform the calculation.
288	CEPREVEN	Table 1.5.	Within waste recycling activities, production and storage values of plastics recycling are provided, which could be use-	R. In the tables it is impossible to cite all existing activities. Only a few (the most

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			ful in the case of mechanical treatment of this waste, in addition to storage values of certain hazardous waste. However, certain key activities for the sector are omitted, such as: .Mixed storage of municipal waste (prior to treatment) .Mixed processing (mechanical treatment) of municipal waste. .Storage of organic slipping of municipal waste (prior to treatment) .Processes for biological waste treatment (composting, biostabilisation, anaerobic digestion or biomethanisation, etc.: all with very different fire load densities). .Compost storages, biostabilised material and digested material. .Thermal waste treatment (incineration). In addition to the above and in view of the various materials and treatments that may occur in the waste management sector, at least one 'mixed waste' and one 'biodegradable organic waste' activity, both in its storage and production (treatment) version, are called upon to cover the activities of the waste management sector.	representative) are cited, and the project executor is responsible for searching for the one that best fits, or using another of the multiple possibilities offered by Annex I to perform the calculation.
289	Official College of Industrial Engineers of the Valencian Community	Annex I, Table 1.5 (in full):	Annex I, page 19. List of activities much less exhaustive than the pre-existing one (Table 1.2 of Annex I of the RSCIEI 2004: RD 2267/2004). The proposed new table is much less exhaustive than the current one, characterising only 117 activities, compared to the more than 500 originally characterised (RD 2267/2.004). This alteration prevents/difficult the tasks of modelling and designing activities by fire load density. **It is proposed:** Deleting the new proposed Table 1.5, maintaining the pre-existing table (Table 1.2 of Annex I to the RSCIEI 2004: RD 2267/2004)	R. The 2004 tables have been estimated to have become obsolete and needed to be updated, which is why they have not been included. New tables include the most important data.
290	Official College of Industrial Engineers of the Valencian Commu-	Annex I, Table 1.5 (in full):	Annex I, page 19. The proposed new table (Table 1.5 of Annex I to the RSCIEI) does not distinguish between the nature of the same product type (e.g. 'wooden furniture' vs 'steel furniture'), con-	R. The 2004 tables have been estimated to have become obsolete and needed to be updated, which is why they have not been included. New tables include the

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	nity		trary to the pre-existing table (Table 1.2 of Annex I to the RSCIEI 2004: RD 2267/2004). The nature of the product ('wooden furniture' vs 'steel furniture') is fundamental in characterising the fire load density of an activity (wood vs steel, for example). This alteration makes it difficult to model and design activities by the fire load density realistically. **It is proposed:** Deleting the new Table 1.5 proposal, keeping the pre-existing one (Table 1.2 of Annex I of the RSCIEI 2004: RD 2267/2004)	most important data. On the other hand, in Annex I several options are given to carry out the classification, meaning the project executor can choose to use one route or another for the calculation, being able to obtain the data from different sources.
291	Official College of Industrial Engineers of the Valencian Community	Annex I, Table 1.5 (in full):	Annex I, page 19. The proposed new table (Table 1.5 of Annex I to the RSCIEI) does not allow for adequate modelling of activities related to the furniture industry. Contrary to the pre-existing table (Table 1.2 of Annex I to the RSCIEI 2004: RD 2267/2004), the proposed new table (Table 1.5) does not allow, among others: – To distinguish between 'Manufacture of steel furniture' and 'Manufacture of wooden furniture'. – To distinguish between 'Storage of wooden furniture' and 'Storage of furniture of other nature (steel, for example)'. – Model the activity of 'furniture varnish'. – Model the activity of 'Wood furniture varnish'. This alteration makes it difficult to model and design activities by fire load density realistically. **It is proposed:** Deleting the new proposed Table 1.5, maintaining the pre-existing table (Table 1.2 of Annex I to the RSCIEI 2004: RD 2267/2004)	R. The 2004 tables have been estimated to have become obsolete and needed to be updated, which is why they have not been included. New tables include the most important data. On the other hand, in Annex I several options are given to carry out the classification, meaning the project executor can choose to use one route or another for the calculation, being able to obtain the data from different sources.
292	Official College of Industrial Engineers of the Valencian Community	Annex I, Table 1.5, section 'E. LOGISTICS', Activity 'Storage of furniture':	Annex I, page 21. A 'generic' activity of 'storage of furniture' is characterised, regardless of the nature of the furniture (wooden furniture, steel furniture, etc.). It does not distinguish between the nature of the same type of product/activity (e.g.: wooden furniture vs steel furniture). The proposed new table (Table 1.5 of Annex I to the RSCIEI, Section 'E. LOGISTICS', Activity 'Storage of furniture') does not allow to specifically model the storage of wooden furni-	PA. A clarification has been added, explaining that it does not apply to metal furniture. However, the entry is not deleted because it is deemed relevant. On the other hand, it should be remembered that in the text several options are given to perform the calculation, and that if the project executor has more precise values he can use them.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			ture (grouping all furniture under the same heading, regardless of the nature of the furniture: steel, wood, etc.), contrary to the provisions of the pre-existing table (Table 1.2 of Annex I to the RSCIEI 2004: RD 2267/2004). This alteration makes it difficult to model and design activities by fire load density realistically. **It is proposed:** Delete the generic entry 'storage of furniture' in section 'E. LOGISTICS' of the new Table 1.5 proposed in Annex I of the RSCIEI, maintaining the pre-existing (Table 1.2 of Annex I of the RSCIEI 2004: RD 2267/2004)	
293	Official College of Industrial Engineers of the Valencian Community	Annex I, Table 1.5, section 'E. LOGISTICS', Activity 'Storage of furniture':	Annex I, page 21. The value 'q_v = 2,800 MJ/m³ (Net)" for this activity is arbitrary. It does not distinguish between the nature of the stored furniture (wood/steel/etc.). It implies an increase in the density of design fire load (qv) when the activity of 'storage of wooden furniture' is modelled compared to the pre-existing table (Table 1.2 of Annex I of the RSCIEI 2004: RD 2267/2004). Tables 1.2-1.1 2004: As can be seen, the values of qv for storage increase by 470% for h≤5 m and by 600% for greater heights, compared to those obtained based on RD 2267/2.004, which represents discrepancies in the modelling of a fire load of the order of 400% (or 600%). **It is proposed:** Delete the generic entry 'storage of furniture' in section 'E. LOGISTICS' of the new Table 1.5 proposed in Annex I of the RSCIEI, maintaining the pre-existing (Table 1.2 of Annex I of the RSCIEI 2004: RD 2267/2004)	PA. A clarification has been added, explaining that it does not apply to metal furniture. However, the entry is not deleted because it is deemed relevant. On the other hand, it should be remembered that in the text several options are given to perform the calculation, and that if the project executor has more precise values he can use them.
294	Official College of Industrial Engineers of the Valencian Community	Annex I RSCIEI, Table 1.5, section 'E. LOGISTICS', Activity 'Generic storage':	Annex I, page 21. The value 'qv = 12,000 MJ/m³ (Net)" for this activity is arbitrary. It does not distinguish between the nature of stored products. It involves modelling a 'General Logistics Storage' as if 43 % – 47 % of the total storage capacity will go to diesel storage. (...) Taking the value 'qv = 120,00 MJ/m³ (Net)" for this activity is equivalent to considering that a general logistics warehouse is intended to store diesel in more than 40 % of the total storage capacity of that warehouse. This design hy-	PA. This heading has been rewritten to indicate a range of values, as these can vary from case to case, and a note has been added explaining how it should be applied. On the other hand, it should be remembered that in the text several options are given to perform the calculation, and that if the project executor has more precise values he can use them.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			pothesis (value qv = 12,000 MJ/m³ Net) is arbitrary and totally disproportionate. It involves considering that a general logistics warehouse in which different products are stored up to an effective net height (discounting empty spaces) is equivalent to filling all existing shelves with oil to an effective net height (discounting empty spaces) of 4.34 m. **It is proposed:** Delete the generic entry 'storage (generic)' in the section 'E. LOGISTICS' in the new Table 1.5 proposed in Annex I of the RSCIEI.	
295	Official College of Industrial Engineers of the Valencian Community	Annex I RSCIEI, Table 1.5, section 'E. LOGISTICS', Activity 'Storage of household products':	Annex I, page 21. The value 'qv = 16,200 MJ/m³ (Net)' for this activity: it is arbitrary. It does not distinguish between the nature of stored products. (...) **It is proposed:** Delete the generic entry 'storage of household products' from the section 'E. LOGISTICS' in the new Table 1.5 proposed in Annex I of the RSCIEI.	A. This heading is removed from the table which actually referred to household cleaning products and is deemed unclear.
296	Official College of Industrial Engineers of the Valencian Community	Annex I RSCIEI, Table 1.5, section 'E. LOGISTICS', Activity 'Generic storage':	Annex I, page 21. The implementation of the activity of 'General logistic storage' in Type B establishments is prohibited. This prohibition is due to the values of 'qv' prescribed in Table 1.5 for the activity of 'Generic Storage' under the heading 'E. Logistics'. (...) Thus, the maximum permissible height of products stored for a 'General logistic warehouse' activity permitted in a Type B establishment is 1.57 m. Therefore, it is not permitted to set up a 'General logistic warehouse' in a Type B establishment in which products are stored at a height of more than 1.60 m. Therefore, storage on shelves (h,max = 1.57 m) or surface storage with heights greater than 1.57 m is not allowed. (...) The cause of this de facto prohibition stems from the values of 'qv' (both 'Net' and 'Gross') that the new Table 1.5 assigns to this activity, resulting in a High Risk 8 activity in all real cases (taking as design parameters the arbitrary and disproportionate values of qv=6 000 MJ/m³ 'Gross' or qv=12 000 MJ/m³ 'Net'). The values of qv=6 000 MJ/m³ (Gross) and qv=12 000 MJ/m³ (Net) that give rise to this de facto prohibition are arbitrary, disproportionate and do not conform to a realistic modelling of this type of activity. This prohibition also extends to pre-	PA. The heading indicated has been rewritten to indicate a range of values, as these can vary from case to case, and a note has been added explaining how it should be applied. With these changes, it is understood that the casuistry contemplated in the submission is resolved. On the other hand, it should be remembered that in the text several options are given to perform the calculation, and that if the project executor has more precise values he can use them.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			existing activities or establishments that undergo alterations (extensions, reforms, changes of owner, etc.). It is proposed: Delete the generic entry 'storage (generic)' in the section 'E. LOGISTICS' in the new Table 1.5 proposed in Annex I of the RSCIEI.	
297	Official College of Industrial Engineers of the Valencian Community	Annex I RSCIEI, Table 1.5, section 'E. LOGISTICS', Activity 'Storage of household products':	Annex I, page 21. The implementation of the activity of 'Storage of domestic products' in Type B establishments is prohibited. This prohibition is due to the values of 'qv' prescribed in Table 1.5 for the activity of 'Storage of household products' under the heading 'E. Logistics' (...) It is therefore not allowed to set up a 'household store' in a Type B establishment in which products are stored at a height greater than 1.20 m. Therefore, storage on shelves (h,max = 1.16 m) or storage on surfaces with heights greater than 1.16 m (...) is prohibited. (...) The cause of this de facto prohibition stems from the values of 'qv' (both 'Net' and 'Gross') that the new Table 1.5 assigns to this activity, resulting in a High Risk 8 activity in all real cases (taking as design parameters the arbitrary and disproportionate values of qv=8.100 MJ/m^3 'Gross' or qv=16 200 MJ/m^3 'Net'). The values of qv=8 100 MJ/m^3 (Gross) and qv=16.200 MJ/m^3 (Net) that give rise to this de facto prohibition are arbitrary, disproportionate and do not conform to a realistic modelling of this type of activity. **It is proposed:** Delete the generic entry 'storage of household products' from the section 'E. LOGISTICS' in the new Table 1.5 proposed in Annex I of the RSCIEI.	A. This heading is deleted from the table, which actually referred to household cleaning products and is deemed unclear.
298	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Annex I. 3. Characterising fire sectors and areas according to their intrinsic risk level. Table 1.5.	Table 1.5 FIRE LOAD DENSITY Possible errors detected in the table: E. LOGISTICS. DISTRIBUTION CENTRES Generic storage gross qv = 6 000 MJ/m^2, net qv = 12 000 MJ/m^2 In practice, if these values are correct for the legislator, all logistic storages would be NRI HIGH 8, even without including the weight of the wood from pallets or packaging. How-	A. The heading indicated to indicate a range of values has been rewritten, as these can vary from case to case, and a note has been added explaining how it should be applied. With these changes, it is understood that the casuistry contemplated in the submission is resolved. On the other hand, it should be remem-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			ever, for a generic storage, one would expect a fire load density that was in the average of the rest of the products in Table 1.5, or at least at some intermediate point. However, generic storage is presented with six times more fire load than tires. It is requested to clarify whether that is the intention of the legislator, or whether it is an error in the table. In addition, according to Article 12.4., the increase in the fire load is a 'substantial change', and therefore these values imply the application of the new Regulation.	bered that in the text several options are given to perform the calculation, and that if the project executor has more precise values he can use them.
299	Professional Association of Fire Technicians (APTB)	Annex I Table 1.5. AVERAGE LOAD-DENSITY VALUES OF MANUFACTURING ACTIVITIES (q_s), OF STORAGE (q_v) AND ITS ASSOCIATE COEFFICIENTS (C_i, R_{min})	Going from the 690 headings in Table 1.2. of the current Regulation to the 115 headings of Table 1.5. of the new Regulation means really complicating the calculation of the weighted and corrected fire load density of the industrial establishment. A lot of very frequent industrial activities are missing. To calculate the weighted and corrected fire load of these activities not appearing in Table 1.5. by the density of fire load of the materials present in the establishment (MJ/Kg) would be very unreliable and tremendously complicated for the project executor. With this table, the technical project editors will have many difficulties in determining the risk of many industrial establishments not included, and the control technicians will not have enough tools to validate the risk assessment considered by the project executor.	R. Annex I proposes a number of options for carrying out the calculations, which have been further detailed than in the 2004 regulations to make them simpler to implement and more precise. Project executors can select the route that best suits what they are looking for.
300	Professional Association of Fire Technicians (APTB)	Annex I Table 1.5. AVERAGE FIRE LOAD DENSITY VALUES OF MANUFACTURING ACTIVITIES (q_s), OF STORAGE (q_v) AND THEIR ASSOCIATED COEFFICIENTS (C_i, R_{min})	If we compare Table 1.5. with Table VFK of 2007, which seems to be the table from which the values of the values of the fire load densities of the different industrial activities have been selected, there are several values that have been modified both in the term and in the value and the reason is not understood.	A. Errors detected have been corrected.
301	KREAN S.COOP	ANNEX I Table 1.5.	The fire load units used are MJ/m² or MJ/m³. Include Mcal/m² and Mcal/m³ There is a lack of many activities very common in industry and necessary to be able to calculate the risks of the establishments (e.g. processing centres, pump room, hydraulic	R. The units are correct and no need to add others. Regarding lists of activities, the annex provides several ways to perform the calculation. On the materials to be stored, the text for the calculation method has been further elaborated on

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			power plants, battery rooms, etc.) The materials to be stored have been simplified, and it is understood that applying these values must be ignored everything related to auxiliary elements in the storage such as pallets, shrink-wrapping etc. Applying these values any current warehouse results in High Intrinsic Risks since the load ranges considered between the different types are not modified. It would not be possible to renovate any existing building in the event of change of user indicating the same activity, it would not comply in any case the regulation having to always go through a financial way. In some cases they would even become layouts not allowed under ANNEX II paragraph III.	the 2004 Regulation. Regarding changes in activity and rehabilitation, this matter is covered by the regulation.
302	SFPE Spain	Table 1.5.	The list is less exhaustive than that of Royal Decree 2267/04 (which was already limited). can the values in Table 1.2 of 2267/04 still be used?	C. Specific proposals have not been included. On the subject of the question: the 2004 Regulation ceases to be in force once the new one is published, and so the old tables are no longer applicable. Annex I proposes several ways for performing the calculations. Project executors can select the route that best suits what they are looking for. In addition, the text of each section says when other data sources can be used.
303	SFPE Spain	Table 1.5.	Table 1.2 of 2267/04 distinguished between the manufacture of 300JMJ/m² cardboard, and the manufacture of corrugated board 700JMJ/m² and others. Table 1.5 only includes production/transformation of cardboard/corrugated cardboard with 1,500JMJ/m² can the values in Table 1.2 of 2267/04 still be used?	C. Specific proposals have not been included. On the subject of the question: the 2004 Regulation ceases to be in force once the new one is published, and so the old tables are no longer applicable.
304	SFPE Spain	Table 1.5.	Table 1.2 of 2267/04 distinguished between 80Mj/m² paper varnishing, 200JMJ/m² paper manufacturing, and 700JMJ/m² paper processing-making and others. Table 1.5 only includes paper production/processing with 700JMJ/m². Can the values of Table 1.2 of 2267/04 still be used?	C. Specific proposals have not been included. On the subject of the question: the 2004 Regulation ceases to be in force once the new one is published, and so the old tables are no longer applicable.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
305	SFPE Spain	Table 1.5.	A number of shipping and packaging activities for various products were included in Table 1.2 of 2267/04. They are only included in Table 1.5. Can the values in Table 1.2 of 2267/04 still be used?	C. Specific proposals have not been included. On the subject of the question: the 2004 Regulation ceases to be in force once the new one is published, and so the old tables are no longer applicable.
306	SFPE Spain	Table 1.5.	Table 1.2 of 2267/04 included several manufacturing activities and storage of various food products (vegetables, frozen, preserved, pre-cooked, etc.). They are only included in Table 1.5. Can the values in Table 1.2 of 2267/04 still be used?	C. Specific proposals have not been included. On the subject of the question: the 2004 Regulation ceases to be in force once the new one is published, and so the old tables are no longer applicable.
307	SFPE Spain	Table 1.5.	Various workshop activities were included in Table 1.2 of 2267/04. They are only included in Table 1.5. Can the values in Table 1.2 of 2267/04 still be used?	C. Specific proposals have not been included. On the other hand, the new regulation does include tickets for workshops. On the subject of the question: the 2004 Regulation ceases to be in force once the new one is published, and so the old tables are no longer applicable.
308	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II. I. Definitions V. 'Safe outside space'	Specify the characteristics and location of the *safe outside space* in uncovered D-type spaces	R. No changes needed to be made to the text. In D-type spaces, this concept is not as relevant, since they are open spaces. However, if the concept were to be applied, it would be understood to be similar to that included in the definition.
309	Official College of Industrial Engineers of the Valencian Community	Annex II, Point I. Definitions	Annex II, page 1 It is proposed: 1.- include the definition of façade since all the enclosures are not façades. Once defined as a façade, the types of façades can be defined. It is important to clarify these concepts. 2.- Define or refer to secondary structural element (roof) according to CTE DB SI 6.4. This is defined in Note 2. From Table 2.5.1. of Annex II, but it should be defined in advance as it is a term used earlier.	R. The text is sufficiently clear. No changes are necessary.
310	SFPE Spain	ANNEX II Definitions b) Load-bearing structure: The sup-	In relation to this point, the following is indicated. On the one hand, the same definition that already existed in RSCIEI R.D.2267/2004, Annex II, point 1 is respected. Defini-	R. The definition in this section defines 'load-bearing structure'. About the roof, in this definition it makes it clear that it

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		porting structure of a building shall be understood to consist of the following elements: forged, beams, supports and main and secondary roof structure.	tions, sub-point B: 'B. Load-bearing structure. The supporting structure of a building shall be understood to consist of the following elements: forged, beams, supports and main and secondary roof structure.' The new document, RSCIEI draft 2022, again does not clarify what is meant by '*secondary roof structure*'. A clear definition from a structural engineering point of view seems to be lacking. If the definition refers to roof straps, a clear distinction should be made whether they contribute to the stability of the structural system or not in order to discern their role in the main skeleton. In addition, if the definition encompasses the structural elements that contribute to ensuring the stability of the structural system, it must clearly state this, since it is not clear, as well as the objectives that must be met.	includes the entire roof structure. For this purpose, the definition of load-bearing structure is completely defined with the current wording. On the other hand, the case of roof straps is explained in the note to Table 2.5.2.
311	particular	Annex II RSCIEI, section I. Definitions (c) Light roof, as follows: 'c) Light roof: Light roof is understood as defined in Table 3.1 of Section 3.1.1 of the Basic Document 'Structural Safety Building Actions' (DB-SE-EA) of the CTE. (Note: Light roof means a roof whose permanent load due solely to its enclosure does not exceed 1 kN/m²).'	The 2004 Regulation considered not only the roof material, but also the roof gantry structure and belts, as well as cranes, the weight of the rail beam and the crane structure itself, in calculating the roof's own weight. It was understood that it was important to consider all of these elements in order to reduce their fire resistance, since their collapse in a shorter time could affect the SEIS and favour the dissipation of temperature and fire fumes. In this definition this concept has been ignored and only mentions 'enclosure' without specifying whether only the covering material or also the secondary structure that supports it is understood, since without it the enclosure is not sustained. Taking the definition of the DB-SE-EA of the CTE by reducing the load only to the enclosure, places at the same level, in terms of permanent load, light structures, such as metal or wood, with concrete structures, which, in the event of premature collapse might, by reducing the time of fire resistance, lead to personal damage, evacuation or compartmentalisation (due to their large dimensions and weight). In industrial establishments, the use of the metal structure is frequent, as it makes the adapting buildings to the pro-	R. The definition of light roof is the same as that of the CTE. The current regulation has been aligned with the CTE in this respect. Changing the text is not appropriate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			ductive processes of the industries very flexible. In addition, the existing industrial building stock in which the new RSCIEI can be applied for the implementation of new activities is significant. Eliminating this competitive advantage over the concrete structure has a significant effect on competition between the two sectors as well as a considerable impact on SMEs in the metal structure sector, which will reduce their market share. In view of the above, the definition of light roof is proposed as follows: '*c) Light roof: Light roof means a roof whose permanent load does not exceed 1 kN/m². It shall be construed as permanent load, that resulting from taking into account the assembly consisting of the main roof structure, plus the straps and cover materials and in the case of cranes, account must also be taken of the weight of the rail beam itself and that of the structure of the crane on which the hoist is moved.*'	
312	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX II CONSTRUCTION REQUIREMENTS OF INDUSTRIAL ESTABLISHMENTS I. Definitions c) Light roof:	c) Light roof: Light roof is understood as defined in Table 3.1 of Section 3.1.1 of the Basic Document 'Structural Safety Building Actions' (DB-SE-EA) of the CTE. (Note: Light roof means a roof whose permanent load due solely to its enclosure does not exceed 1 kN/m²). It is proposed to introduce the clarification: 'the concept of enclosure must include sheet metal, insulation and waterproofing membranes'.	R. The definition of light roof is the same as that of the CTE. The current regulation has been aligned with the CTE in this respect. Changing the text is not appropriate.
313	SFPE Spain	ANNEX II Definitions c) Light roof: Light roof is understood as defined in Table 3.1 of Section 3.1.1 of the Basic Document 'Structural Safety Building Actions' (DB-SE-EA) of the CTE. (Note: Light roof means a roof whose permanent load due solely to its enclosure does not exceed 1 kN/m²).	The following table has been drawn up where a comparison between RSCIEI regulations is presented (Royal Decree 2267/2004, of 3 December, the deletion of the RSCIEI of 2022 and the CTE, DB-SI for the definition of light roof: (Table image). In view of the analysis of the above table, it is concluded that the 2022 RSCIEI Draft adopts the definition of CTE DB-SI, and differs substantially from what the RSCIEI R.D. 2267/2004 established. In the latter, under point E. Permanent load. It is defined: 'E. Permanent load. For the purpose of classifying a roof as light, the load shall be construed as a permanent load resulting from taking into account the assembly consisting of the main structure of roof porticoes, plus the straps and	R. The definition of light roof is the same as that of the CTE. The current regulation has been aligned with the CTE in this respect. Changing the text is not appropriate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			covering materials.' Although, from a structural-engineering point of view, including the weight of the portico to classify a roof was questionable yes conceptually speaking is quite correct if what is taken into account is the permanent weight of the roof lintel (or lattice), not thus the supporting column to which it joins. Transferring a definition of light roof from the CTE DB SI applied to a building to the draft RSCIEI 2022 does not adapt to a constructive reality in the industry, since the roofing system of a building, such as those regulated by the CTE, does not have to do with the construction systems of enclosures on the roof of industrial buildings. It is therefore proposed to change the definition of light roof to the following: *Any roof the own weight of which is understood as such to the system formed by the weight of the roof straps plus the weight of the enclosure system plus the proper weight of the structural element receiving the straps, regardless of their nature and shape, e.g., a beam type lintel, lattice (either spatial or not) etc., and which in no case exceeds the value of 100 kg/m^2 will be classified as light.'* Another issue not to be taken into account any less is the consideration of solar panel parks that are increasingly present in the roofs of industrial constructions and buildings within the industry and the consideration as permanent load as fixed facilities.	
314	IETcc	The entire RD. RD 842/2013 (quoted in Annex II)	As this Royal Decree amends other Royal Decrees relating to it, it is proposed to amend Article 2 of 'RD 842/2013 of 31 October approving the classification of construction products and building elements according to their response and fire resistance properties', in order to add the extension of fire resistance test results (ExAPS) after the reference to 'The test and classification...'.	R. While the content of the comment is of interest, it is deemed that it is not appropriate to make an amendment to RD 842/2013 at this time. This issue can be addressed in greater detail the next time the RD is updated. Alternatively, due to the degree of specificity of the case, it could also be explained on a case-by-case basis, with a note or clarification in the application guide.
315	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II. Section II. Page 62. Fire-behaviour conditions of con-	Those products/systems with fire resistance features installed on site outside the field of application covered by the classification report remain uncovered. This is common in	R. These tests and classifications are regulated in Royal Decree 842/2013. If it were necessary to include more details

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		struction products and building elements	large doors or firewalls that cannot be tested in these dimensions, or because they are installed with changes that the laboratory understands do not require a new test. At present. many of these products are installed without any type of evaluation or control, in many cases due to ignorance of those responsible for the work and the optional management. When there is no EXAP standard, laboratories normally conduct specific studies to validate the installation under the actual conditions of the work. Sometimes thermo-mechanical calculations or tests adapted to the needs are even necessary. CTE calls on EXAP extension reports of the application field, whether or not based on EXAP standards. This term should only be used with reports based on EXAP standards. PROPOSAL: Including the following text based on the CTE In the event of reports of extension of the application of the results of the fire resistance tests (EXAP) are used, they should be based on the applicable standard in force (EN EXAP). Where this does not exist, they should be based on their latest project available (prEN EXAP) and where that does not exist or does not cover the specific case, on the experience of the laboratory. In the latter two cases, the choice of the determining parameters for carrying out such an assessment is at the laboratory's discretion and, therefore, under its responsibility. When an EXAP standard is approved, updated or amended, extension reports drawn up or renewed must conform to the new version of the standard. An EXAP report loses its validity when any of the test reports on which it is based loses it. EXAP reports must be produced by accredited laboratories for testing by an officially recognised entity.	on specific cases, they could be added to the RD the next time it is modified or, due to the degree of specificity of the case, it could also be explained on a case-by-case basis, with a note or clarification in the implementation guide.
316	Official College of Industrial Engineers of the Valencian Community	Annex II, point II. Fire-behaviour conditions of construction products and building elements	Annex II, page 2 1.- Where it says: 'II. Fire-behaviour conditions of construction products and building elements' **It is proposed:** 'II. Fire-behaviour conditions of construction products, construction elements **and structural elements**'	R. The current wording is correct and clear enough. The references made are correct and the way of functioning that is proposed is the same as indicated in the CTE DB-SI, which is complete and is perfectly valid. No need to make

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			For materials, response, for building elements confinement-spreading and for structure, stability. Structural elements have a specific treatment in section 5 of this Annex II. 2.- The fourth paragraph ('Alternatively...') refers on the one hand to an alternative (performance) method of estimating the required fire resistance and, on the other, to the methods of verification of this requirement by application of the provisions for that purpose in CTE DB SI 6. **It is proposed:** Based on the above, this paragraph should be placed at the end of the **Part 5. Structural fire resistance.** In addition, the paragraph in question should be broken down for clarity, given the importance, into two: – one relating to the determination of the fire resistance characteristic required according to CTE DB SI 6.1 'Generalities' (actually according to 6.1.3) – another relating to the verification of fire resistance according to CTE DB SI 6.6 'Determining fire resistance' by referring to Code-21 together with Annex C to F of the CTE DB-SI for calculation methods. Given the publication and validity of the Structural Code, and the repeal of EHE-08 and any provision that contravenes the provisions of the Code: Where it says 'C to F CTE DB-SI' **It is proposed:** 'Annexes 20, 23 and 31 to the Structural Code and Annexes C to F of the CTE DB SI in so far as they complement them and do not contravene them.'	changes.
317	SFPE Spain	ANNEX II II Behavioural conditions in the event of fire with construction products and construction elements. 'Alternatively, in order to determine the fire resistance characteristic of structures and elements, the provisions of paragraph 1 'Generalities' and paragraph 6 'Determination of fire resistance' of Part SI 6 of CTE DB-	First, from a structural engineering point of view, structural systems must ensure two criteria: - They must be stable with movements compatible with mechanical action. RSCIEI R.D.2267/2004 used the term 'stability' with good judgment. The draft of the 2022 RSCIEI does not mention it at any point, and only mentions 'Resistance. - They must have a resistance as structural section, compatible with mechanical actions for the fire situation. In the analysis of the behaviour of structural systems in the	R. The current wording is correct and clear enough. The references made are correct and the way of functioning that is proposed is the same as indicated in the CTE DB-SI, which is complete and is perfectly valid. No need to make changes. With regard to the last part of the submission, it should be noted that the Structural Code is also fully in force (as

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		SI and Annexes C to F cited there may also be followed.'	event of fire regardless of their nature (building, industrial construction, bridge, etc.) the concepts of 'stability' and 'resistance' must be able to guarantee each of the basic requirements as set out in Chapter II, 'Article 6. Basic fire-safety requirements' of the 2022 RSCIEI draft. A structural system can have a high strength and, however, it could fail because it does not have adequate and sufficient structural stability, especially at high temperatures. Therefore, each of the conditions, stability and resistance, seen separately, are a necessary but not sufficient condition and both must be analysed together. On the other hand, there is in Spain the Structural Code, R.D. 470/2021 of 29 June 2021. The 2022 RSCIEI Draft does not and does not refer to it. Highlighted again is the aspect that in Industrial Plants and Establishments in addition to buildings there are Industrial Constructions (multi-level process buildings, structures that support equipment, pipe bridges, energy production and transformation buildings, etc.) whose structural behaviour is not covered by the CTE DB both the SE document and the SI. It is therefore appropriate to propose that the draft RSCIEI be consistent, and make it possible to use the mandatory regulations in the Spanish State, namely: - CTE DB - Structural Code, RD 470/2021 of 29 June 2021. - Other recommended application and broad use in the Spanish state: Eurocodes:	before was the EHE-08 it replaces) and should also be applied, cited or not in this regulation, since it covers other issues of the structure additional to those requested in the CTE DB-SI or in the RSCIEI. Lastly, with regard to Eurocodes, whether or not they can be used is a matter falling within the scope of the Structural Code and not the present regulation, since it is this regulation that covers this content.
318	Directorate of Strategic Projects and Industrial Administration, Basque Government	Annex II III. Locations not permitted h) Of any risk, on the second floor below ground level, or floors below it.	Proposal: h) Of low risk, on the second floor below ground level, provided that the first low level is of zero risk or is not classified for the purposes of this regulation. Of any risk, on the third floor below ground level, or floors below it. Justification: In a large number of Bus Stations, we have passenger access areas on the first floor below ground level and the repair workshop of the buses, on the second floor, so the use of these floors should be facilitated provided that the upper floor is free of risk. Urban areas of such considerable sizes require the use of underground floors.	R. It is not deemed appropriate to add this casuistry because it is very specific and uncommon. These types of cases can be revolved by equivalent solutions, as the articles collects.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
319	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	RSCIEI ANNEX II III. Locations not permitted	It should be clarified whether the non-permitted locations would have room if the RSCIEI is justified via performance. If this is the case, it should be made clear in the wording so that there are no differing interpretations.	A. Clarification has been added in Article 10 on this matter.
320	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Section III. Locations not permitted d) 'Of medium intrinsic risk, in layouts type A_V, when the length of **its** accessible façade is less than 5 m.'	Add that which is underlined *d) 'Of medium intrinsic risk, in layouts type A_V, when the length of **the** accessible façade **of the establishment** is less than 5 m.*	R. In the section where the accessible façades are treated, it is already clarified what are the possible cases, including also cases where the establishment is inside a building with common areas and does not have its own façade.
321	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Section III. Locations not permitted g) 'Of medium or high intrinsic risk in layouts of type A_H or type B, when the length of **its** accessible façade is less than five m 5.'	Add that which is underlined *g) 'Of medium or high intrinsic risk, in layouts of type A, or type B, when the length of **the** accessible façade **of the establishment** is less than 5 m.'*	R. In the section where the accessible façades are treated, it is already clarified what are the possible cases, including also cases where the establishment is inside a building with common areas and does not have its own façade.
322	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX II. III. Locations not permitted. Section (I)	i) Intrinsic high level 8 risk, in layouts of type Ah or type B. As a result of the previous point (NRI High 8), no existing logistics establishment that is altered, renovated or expanded since the previous layout TYPE B according to RD2267/2004 has a place in the new RSCIEI, since it will become TYPE Ah or Type B in a location not allowed, leaving no alternative but the demolition to the existing logistics park.	A. Several sections of Annex I have been rewritten and clarified in order to avoid excessive values in cases that do not apply. It is therefore understood that the issue raised in this submission is already resolved there. On the other hand, a new note has been added to Table 2.1.1 with a number of exceptions to non-permitted locations, if they meet specific requirements.
323	Official College of Industrial Engineers of the Valencian Community	Annex II, Part 1: Internal spreading.	Annex II, page 3. 1.- Where it says 'All industrial establishment' **It is proposed:** 'All industrial **building**' The definition of industrial building is required in the corresponding section of definitions or glossary of terms.	R. The regulations deal with industrial establishments, which may be in part of a building, in all of it, in several or in an outside area. The concept of industrial building is not defined, because it is not necessary to do so.
324	Superior Council of the Colleges of	RSCIEI. Annex II. S1 1. Compartmentalisation of industrial	Maximum constructed areas of the sectors are established according to the level of intrinsic risk and layout of the es-	R. The Annex has been accompanied by charts where it has been determined to

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	Architects of Spain	establishments.	tablishment (Table 2.1.1) and the fire resistance of the building elements of the delimiting elements of the sectors (Table 2.1.2), in certain reduced situations and indicated in Table 2.1.3. The tables in sections 1.3, 1.4 and 1.5 are accompanied by several 'Notes'. It would be appropriate to supplement them with schematic graphs where possible. Point 1.5 on fire areas in open spaces of type D layout, especially sections (a) and (b) would also be made clearer if accompanied by graphics.	be appropriate. More graphics could be included, but it would make it unnecessarily long and complicate to read it. It is understood that in these sections, putting explanations in text is sufficient.
325	particular	Table 2.1.1 MAXIMUM ADMISSIBLE SURFACE AREA OF FIRE SECTOR Note 4 Note 4: In type C layouts, the fire sector can have any surface area, provided that the entire sector has a fixed automatic extinguishing system and the distance to other establishments, as well as to the limits of plots with the possibility of building on them is more than 10 m, free of combustible goods or intermediate elements capable of spreading the fire.	In the case of two buildings with separation between façades of 10 m and between them there is a running rail exclusively for dual-way vehicles and separated by a fence, is it understood to comply with the specification? If the 10 m separation area is an area where vehicles can park, is the specification considered to be compliant?	A. A more detailed text has been added explaining the casuistry.
326	FEDAOC	Annex II, Note 1 to Table 2.1.1, Part 1: If the fire sector is located at the first level below street level, the maximum permissible constructed area shall be 400 m^2, which may be increased by applying Notes 2 and 3.	What happens if a sector is between the first low level and the ground floor? What maximum surface area is applied to this? Suggestion: 400m^2 between the two floors.	PA. Clarification has been added to the text (although not entirely in line with the suggestion of this submission).
327	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Annex II. Part 1. Internal spreading. Table 2.1.1. Page 63.** Maximum admissible constructed surface area of each fire sector	The maximum surface areas have been increased generally, without a technical criterion to justify it. Greater surface area implies greater fire size, greater difficulty of intervention, greater danger of spreading and damage to third parties and the environment. It should be noted that with the new RD the maximum surface area of the A_H is multiplied up to 20 and high risks 6 or 7 are allowed without the project executor having to verify if the structure is prepared not to damage firefighters and	R. The table as a whole has been updated and adapted to current constructive needs, and based on lessons learned. The Ah type is a new type that, in the 2004 Regulation, would be halfway between the previous type A and the previous type B, and the requirements accordingly have now been differentiated between the new definitions

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			other establishments with which it shares structure and enclosures. This means the most risky industrial buildings may now be less secure. In general, the increase in the size of the fire sector would not cause a greater risk if the characterisation of the buildings is performed as indicated above, and if the compartmentalisation and fire behaviour requirements of the structures are correctly described. PROPOSAL: Review the objectives, the characterisation of the buildings, and adapt the requirements to the risk and compliance with the safety objectives.	of Av, Ah and B.
328	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II. Part 1. Internal spreading. Table 2.1.1. **Page 63.** Note 3: Where fixed automatic sprinkler extinguishing systems are installed covering the entire sector, the maximum permissible constructed areas indicated in the table may be multiplied by two.	This note allows you to bend the surfaces of the table when there are sprinklers, regardless of whether or not they are required by the RSCIEI. Previously, they were only folded in the event that sprinklers were not required. As the new surfaces exceed the minimum to require sprinklers, the maximum surface table can always be folded, and the note for A_H, B or C would no longer make sense. **PROPOSAL:** Remove the note and redo the table or leave the table and re-include the need for sprinklers not to be required for application	R. The fact that sprinklers exist (regardless of whether they are required in other sections or not) improves the establishment's ability to deal with a possible fire, which justifies the content of this note. On the other hand, it should be noted that FP equipment – such as sprinklers – has evolved over the last few decades.
329	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Annex II. Part 1. Internal spreading. Table 2.1.1. Page 64.** Note 4: In type C layouts, the fire sector can have any surface area, provided that the entire sector has a fixed automatic extinguishing system and the distance to other establishments, as well as to the limits of plots with the possibility of building on them is more than 10 m, free of combustible goods or intermediate elements capable of spreading the fire	This note is clearly related to external and non-internal spreading. This note comes from the current RD and has produced different interpretations by the authorities. I believe it should be made clear. What happens when on a plot there are two buildings of different industrials? Must each leave 10 m? That would be the case if they are on different plots, but in many cases 10 m between buildings has been accepted. Can the limits to plots without the option of building or public roads be 0m? The distance of 10 m does not always mean that the damage to third parties will be eliminated. When a building is higher than 10 m, if there is collapse of the structure or façade to the outside you can invade the neighbouring plot. Likewise, in this case the façade is not required to resist fire and if there is fuel near it (most storages) there may be enough radiation 10 m from the façade to spread the fire to	PA. A more detailed text has been added in this section explaining the casuistry of the 10 m of separation. However, it does not include the wording proposed by the comment, but an alternative wording. On the other hand, it is not deemed appropriate to change the way in which the buildings proposed by the comment are classified (a matter already assessed in other submissions).

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			any fuel present in the neighbouring establishment. The outside areas are asked to separate the fuel a distance equal to or greater than its height. **PROPOSAL:** If the definition of Type B and C is amended as suggested, this note would no longer be necessary and the C could have unlimited surface area, in any case. If the typology is not changed, it is proposed to amend the following note: Note 4: In type C layouts, the fire sector can have any surface, provided that the entire sector has a fixed automatic extinguishing system and the distance to the façade limit is at least equal to its height. If the distance is lower (type B or C layouts), it will be justified that the collapse of the structure occurs inwards and that the radiation at the boundary of the property does not allow the spreading to neighbouring establishments	
330	European Fire Sprinkler Network	Annex II Table 2.1.1 MAXIMUM ADMISSIBLE CONSTRUCTED SURFACE AREA OF EACH FIRE SECTOR	Having maintained the fire equipment provisions of the former regulation, the fire sector at medium and low risks could be doubled; however, the 12,000 m^2 low risk is of serious concern. This situation provides the opportunity to include higher risk areas within the building and make an average of the total area. We think that these types of buildings require very little protection, only R30 in structures, manual push-buttons, extinguishers and a single limited water supply for firefighters at (500 l/min) and perhaps voice evacuation? This type of establishment would have to be protected in a different way. Such establishments might become popular. • In extensions similar to Low Risk 2 with surfaces of 12,000m^2, we could find fire behaviour that generates 10 TJ inside. • There are multiple sources that would indicate a significant fire flow. Refer is made to the 2014 Fire Protection Research Foundation Assessment of Fire Flow Methodologies. • Lack of access to sufficient water supply is often cited as a problem in the defence of large structures. • In the United Kingdom, the horizontal penetration distance, in a building, for firefighters was assessed at 34 m	PA. In general, it is understood that the measures proposed in the current text are proportionate and appropriate to the risk. However, for cases of large areas of low risk, but with unevenly distributed fire load, a paragraph has been added to Annex III covering this casuistry (Annex III, section 7.1.2). This covers the specific casuistry that is cited and that we understand that it might be appropriate to collect with regard to what is argued in the comment.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			without climbing. This was highlighted by a government study in 2010. All this adds to the sense that a fairly large building with limited fire protection is not attractive. Proposal for amendment: Add Note 5 to Table 2.1.1 Note 5. In relation to the fire sectors of Low Risk 2, the following limitations will apply in order to reach the maximum permitted areas: a. Restrict the dimension of the building to a maximum of 80m to facilitate the intervention of firefighters. B. Concerning Annex III, Part 3. Ensure the provision of hydrants in the sector deemed medium risk. C. Storage in the fire sector should be limited to a maximum height of 5m. D. Protect with a fixed automatic extinguishing system, as in the NO LIMIT option, as an alternative to points a, b and c. Note 4 of the table should only correspond to the NO LIMIT option by placing it in parentheses next to it, and removing it from the lower boxes in Medium and High risks where it should not apply.	
331	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex II to the RSCIEI, section 1(1.3), note 2 to Table 2.1.1 'Note 2: If the accessible façade of the industrial establishment exceeds 50 % of its perimeter, the maximum permissible constructed surfaces indicated in the table may be multiplied by 1.25.'	Where it puts 'accessible address of the establishment', substitute with 'accessible address of the sector'	R. In the section where the accessible façades are treated, it is already clarified what are the possible cases, including cases where the establishment is inside a building with common areas and does not have its own façade. On the other hand, it is unrealistic to require that all sectors have accessible façades. There may be very concrete cases where demanding that would mean practically prohibiting sectoring.
332	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Res-	Annex II to the RSCIEI, section 1(1.3), note 4 to Table 2.1.1 'Note 4: In type C layouts, the fire sector may have any area, provided that the entire sector has a fixed automatic extinguishing system and the	In order to avoid possible interpretative doubts, it is proposed that, where it puts 'the distance to other establishments, as well as the limits of plots with the possibility of building on them' should be replaced by 'the distance to the limits of built plots or with the possibility of building on them'	PA. A more detailed text has been added explaining the casuistry. The new text makes it clear what the conditions are. It should be noted that there may be fire-loaded establishments in non-built-up places, so this situation should

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	cues, Government of Catalonia	distance to other establishments, as well as to the limits of plots with the possibility of building on them is more than 10 m, free of combustible goods or intermediate elements capable of spreading fire.'		also be considered.
333	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex II to the RSCIEI, section 1(1.3), Table 2.1.1, Table notes	It is proposed to add a note 5 which will apply to layouts Ah, B and C of any risk, to limit the size of the sectors below ground, in accordance with the following proposal: 'Note 5: If the fire sector is located at the first level below the street, the maximum admissible constructed surfaces areas indicated in the table shall be divided by two. In addition to the above, in the event that the same sector has parts above and below ground, the limitation of constructed surface of this note will apply only to the lower part. This area may be increased by application of note 3.'	A. Note has been added to the text, and the numbering reordered.
334	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 1. Table 2.1.1 Note 2: 'If the accessible façade of the industrial establishment is **above** 50 %...”	Add that which is underlined *Note 2: 'If the accessible façade of the industrial establishment is **equal to or above** 50 %...'*	A. The proposed text has been added.
335	Official College of Industrial Engineers of the Valencian Community	Annex II, Part 1: Internal spreading. Table 2.1.1	Annex II, page 3. Where it puts 'layout.' **It is proposed:** ”layout **of the building”** Since the generic logistics activity is NRI=8, in Table 2.2.1 the box corresponding to NRI=8, building type B should be enabled, with the additional conditions to be determined to ensure an acceptable risk index, so that logistics can operate and adapt to market demands. The proposed table blocks logistical operators and any possible retrofits.	PA. The layout always refers to the sector or fire area, which in turn is related to the building. No changes are necessary. With regard to the reference to NRI 8, several sections of Annex I have been rewritten and clarified in order to prevent excessive values from emerging in cases that do not apply. It is therefore understood that the issue raised in this part of the submission is already resolved there. On the other hand, a new note has been added to Table 2.1.1 with certain exceptions to the non-permitted locations.
336	Official College of	Annex II, Part 1: Internal spreading.	Annex II, page 4.	R. The current text is correct. No

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	Industrial Engineers of the Valencian Community	Table 2.1.1. Note 2	Where *'If the accessible façade of the industrial establishment...'* **It is proposed:** *If the accessible façade of the industrial* ***building****...'*	changes are necessary.
337	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX II. Part I. Point 1. Table 2.1.1. Note 4.	Note 4: In type C layouts, the fire sector can have any surface area, provided that the entire sector has a fixed automatic extinguishing system and the distance to other establishments, as well as to the limits of plots with the possibility of building on them is more than 10 m, free of combustible goods or intermediate elements capable of spreading the fire. In the logistics sector, the existence of partitioning walls inside warehouses represents a major loss of competitiveness, due to the malfunction of radio frequency systems and the increased distances to travel in the operation of the movement of goods when crossing sectors by defined points. Therefore, having logistics platforms of 50,000 m² divided into sectors of 4,000 x 2 = 8,000 m² is not an option in the current logistics, and will be less so in the next 20 years, which is the period of validity of this new RSCIEI. On the other hand, it is not clear the relationship between the probability of external spread of the fire and the maximum size of the interior sector, there are clearly more determinant factors: height of the buildings in relation to the separation between them, constructive composition of the façades, surface of facing façades (it is not the same a punctual approach of two corners, that having a façade of hundreds of metres facing another, etc.). Since most large logistics warehouses will tend not to sectorise internally, we propose improving the definition of the conditions under which this can occur through note 4. Comment 1: Two establishments within the same cadastral parcel should only have 10 m of separation between them, while if there is a boundary, they will be 20 m, 10 on each side of the boundary of the plot. Therefore, an administrative act of grouping of parcels may reduce the requirement,	PA. A more detailed text has been added explaining the casuistry of this section, and detailing better which cases can apply this note and which can not. This way, doubts or divergences of interpretations are avoided. However, the wording proposed in this comment is not used, but different wording is used.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			without changing the nature of the establishments. And vice versa: a segregation of plots would leave non-standard buildings located 10 m from each other before the administrative act. Comment 2: A silo 30 m high should keep the same distances to nearby establishments as a 10 m high industrial unit. Nor has taken the construction nature of the façade walls been taken into account, which can be made with or without REI characteristics. **It is proposed**: go to the solution already expressed in another industrial safety regulation. The RAPQ chemical storage regulation (RD 656/2017), in its ITC MIE-APQ10 'storage in mobile containers' applicable to logistics storage on flammable liquids, among other products, includes a table. (table image). In existing buildings, even having to make a strong investment in the protection of façades, the application of this table of the RAPQ would give viability solution to buildings that, 10 m apart from other establishments, are not 10 m from the limit of the plot in which they are located.	
338	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Table 2.1.1 MAXIMUM ADMISSIBLE CONSTRUCTED SURFACE ARE OF EACH FIRE SECTOR Note 1: If the fire sector is located at the first level below street level, the maximum permissible constructed area shall be 400 m², which may be increased by applying Notes 2 and 3.	Table 2.1.1 MAXIMUM ADMISSIBLE CONSTRUCTED SURFACE ARE OF EACH FIRE SECTOR Note 1: If the fire sector is located, even partially, on the first level below street level, the maximum permissible constructed area shall be 400 m² on the ground floor, which may be increased by applying Notes 2 and 3.	A. Clarification was added to the text explaining this situation.
339	Professional Association of Fire Technicians (APTB)	Annex II Part 1 Table 2.1.1 MAXIMUM ADMISSIBLE CONSTRUCTED SURFACE AREA OF EACH FIRE SECTOR	A low risk 2, is a very common industry that can have a fire load of up to 850 MJ/m^2. To give us an idea, a commercial establishment, in an exempt building that has a fire load greater than 500 MJ/m^2, according to the DBSI must have an automatic extinguishing facility, if the surface is greater than 1,500 m^2. So an industrial establishment, exempt, with a higher fire load, could	PA. In general, it is understood that the requirements set out in Annexes II and III are proportionate to each individual case. Concerning cases of large low-risk areas mentioned in the comment, some changes have been added to Annex III

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			have a sector surface area of up to 12,000 m^2, only with a manual push-button installation and public address. The problem for fire firefighters extinguishing fire is the same in both cases, since the fire load is the same and even in the case of industrial activity is greater, and it does not seem logical so much difference in the limit of the size of the fire sector to require an installation of automatic sprinklers.	adding some extra requirements for these cases (e.g. in Annex III, section 1.1 and section 7.1.2).
340	Efectis France SASU	Annex II, Part 1. Internal spreading Table 2.1.3. *Note 4: In buildings on a single floor and with a light roof, where the total surface area of the fire sector is protected by a fixed automatic extinguishing system and a smoke and heat control system according to paragraph 8.3 of Annex III, the values in Table 2.1.2 may be reduced to the following values: …*	In the case of Ah, the EI requirement is reduced and the surface area of the sector is greatly increased, posing even a high risk. It does not in any case need to be justified that the neighbour is not harmed despite sharing a party wall and structure with other establishments. In the case of B and C, it does not seem prudent that the same should be required, regardless of the risk and distance to the neighbour. In event of partial failure of the sprinklers, the EI30 fire resistance cannot guarantee safe intervention, either from the inside or from the outside. Would a building with a storage mezzanine like those mentioned in Annex IV be considered one-storey? This question has been presented many times with the current RSCIEI and the new text does not resolve it. *It is proposed to halve the requirement for sprinklers, and also to amend the wording of Section 5 (1.3.2).*	R. It should be remembered that this table is a particular case of the table above, and that it is also coordinated with the equivalent table in section 5. Type Ah is a new type whose requirements are at an intermediate point compared to the former Types A and B of 2004. The requirements placed on them seek to be proportional. For types B and C, both EI 30 are asked because this is deemed to be the minimum value to be requested in this circumstance (it is not considered appropriate to ask for 0). Lastly, on mezzanines, their requirements are addressed in Annex IV, and clarifications have been added there.
341	SFPE Spain	ANNEX II 1.3 Part 1. Internal spreading 1. Compartmentalisation of industrial establishments	The requirement of the distance of 10m is, per se, very restrictive. Preventing there from being combustible goods or intermediates likely to spread fire is inappropriate. In note 4, 'free of combustible goods or intermediates liable to propagate fire' should be removed.	PA. A more detailed text has been added explaining the casuistry of this section, and detailing better which cases can apply this note and which can not.
342	Spanish Association of Self Storage (AESS)	Table 2.1.2 FIRE RESISTANCE OF CONSTRUCTED ELEMENTS DELIMITING FIRE SECTORS	We request that admitting activity of self-storage sites as MEDIUM risk in 'Av' buildings in Underground Levels (basements), as it is an extremely regulated and controlled sector with exceptional fire safety, access and surveillance measures. Adding that 80 % of our customers are private, that in their buildings they have storage rooms (the same product) without any control in what they keep, insofar as our sector	R. It is understood that the current text is suitable for this type of casuistry. Changing the text is not appropriate.

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			scrupulously regulates what can be stored so as not to exceed the authorised fire load. We find ourselves in a situation of inequality. In view of the great proliferation of buildings with basements and surplus storage rooms that go to the market without control, that perform the same activity but are not monitored or regulated in the same way.	
343	FEDAOC	Annex II, Tables 2.1.3 and 2.1.2 relating to the fire resistance of the building elements of fire sectors in general, and in over-ground buildings, with a light roof and sprinkler-protected roof, respectively.	The values for low-risk type C industrial units are the same, not benefiting from the advantages of applying the requirements of Table 2.1.3. It is incongruous.	R. Each of the tables collects different casuistry and includes different details. They do not contradict each other. On the other hand, minimum levels have been established that are reflected in both tables. These tables must also be in line with the rest of Annex II and, in particular, the resistance section of the structure.
344	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Annex II. Part 1: Table 2.1.3. Part 5: Tables 2.5.2 and 2.5.3. Page 65, 91, 92, paragraph 1.4, 1.3.1 and 1.3.2** Tables 2.1.3, 2.5.2 and 2.5.3	The tables that in the previous RSCIEI 2004 were 2.3, 2.4, and also for storage on metal racks, have increased the requirements to a minimum of EI 30 or R 30. That rules out exposed metal structures, even with the presence of an extinction system such as automatic sprinklers. This requirement imposes a high construction cost on the sector, and rules out a solution that has proved extremely effective in the experience, by controlling the temperature of the gases below the activation of the sprinklers, in which the steel maintains its resistance. In addition, table 2.5.2 with SCTEH system is inconsistent with 2.5.3 with SCTEH system and sprinklers, since it provides greater benefits to the first than the second, when it should be the other way around. PROPOSAL: Leave the requirements in the order of the previous regulation in Tables 2.3, 2.4 and metal shelves.	R. Shelves are listed in Annex IV and their requirements depend on their specific casuistry. In any event, if an element is part of the structure of the building, it must meet the requirements of the building. This can be met in several ways, so it is not a disproportionate requirement. For tables 2.5.2 and 2.5.3, the requirements are different because they apply to different situations.
345	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 1, Table 2.1.2 Note 3: '...through a **previous** lobby...'	Replace the underlined, the two times it appears *Note 3: '...through an* **independent** *lobby...'*	R This wording has been chosen because what this note seeks is not to refer to measures imposed due to evacuation, but rather to measures for sectorising, so this wording is sufficient.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
346	CEPREVEN	Annex II, Part 1. Paragraph 1.4 *Note 3: Doors that share fire sectors must have fire resistance (EI2), ...*	It is suggested that the following clarifications be incorporated: *Note 3: Doors **or gates, including folding gates, whose main objective is the passage of persons or vehicles,** that share fire sectors must have a fire resistance (EI2), at least half of that required for the element separating both fire sectors, or a quarter of that when the passage is made through a previous hall and two doors. This reduction in fire resistance shall not apply to doors whose dimensions are greater than 3 m wide or 4 m high, in which case it may be halved when the passage is made through a previous lobby and two doors. In the case of other types of mobile compartmentalising elements **explicitly installed for the effective sectorising of the sectors considered** (such as gates) shall not be assimilated to passing doors for the purpose of reducing their fire resistance.*	A. The proposal was added, as it was more detailed and clarified the cases envisaged.
347	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX II. Part I. Point 1. Table 2.1.2. Note 3.	Note 3: Doors that share fire sectors must have a fire resistance (EI2), at least **equal to half that required for the element separate both fire sectors, or a quarter of that when the step is carried out through a previous lobby and two doors**. This reduction in fire resistance shall not apply to doors whose dimensions are greater than 3 m wide or 4 m high, in which case it may be halved when the passage is made through a previous lobby and two doors. In the event of other types of movable compartmentalising elements (such as gates) they shall not be assimilated to passing doors for the purpose of reducing their fire resistance. **It is requested** to change of part underlined with: 'equal to that required of the compartmentalising wall.' **Reason:** For greater security of compartmentalisation elements, pedestrian crossing doors should not weaken the safety of pedestrians, especially if there is no independent lobby, and should therefore have the same characteristics of resistance to smoke and thermal radiation as the sectorising wall itself, since it is constructively viable and economically does not represent an appreciable disruption in construction costs.	R. Mentioning 'compartmentalising wall' in this paragraph is not a precise term. On the other hand, the requirement stipulating separating elements (walls) is very high in many cases, and that is why the note on the doors is written in this way, since it is appropriate to put this type of requirement (for manoeuvrability, etc.).
348	particular	Annex II RSCIEI, Part 1(1.4): 'The fire	The explanation between commas 'such as walls and ceil-	R. If the ceiling is a roof, it does not de-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		resistance of building elements that delimit a fire sector, such as walls and ceilings, shall not be inferior...'	ings' should be removed. In the case of walls, obviously; in the case of ceilings, for being able to cause confusion. If the ceiling is a roof, it should not necessarily have fire resistance. It will be governed by the section Outer Spreading, in any case. If the ceiling is an element with a load-bearing function, such as a forged, then its resistance must be REI and not IS only. The notes in the table would work best without this unnecessary explanation. Doors are neither walls nor ceilings. Note 4 practically requires that the reference to 'ceilings' be avoided in the general submission, since it could lead to a misinterpretation according to which the roof, which is the roof in this case, has fire resistance.	limit fire sectors, and therefore does not apply. The current text is clear in its wording and does not require changes.
349	particular	Annex II RSCIEI, as follows: 'b) Where there is no separation indicated in the preceding paragraph between the perimeter of the area and the combustible materials stored therein, compartmentalising elements must exist to ensure a minimum fire resistance of 60, 90 or 120 in areas of low, medium or high risk respectively (or REI 60, 90 or 120 if they have a bearing function) in such a way as to ensure the non-spreading of the fire in the area concerned. Where such compartmentalisation is carried out by means of vertical separators located within the perimeter of the area, such as walls, they shall have a height of at least 1.5 m higher than the height of the stored combustible materials and shall be extended 1.5 m in horizontal projection at their lateral ends. In the event that a part of the perimeter of the area is adjacent to a part of a façade of a building and	Because in the event that there is no separation of 5 m between the area and another fire sector and the combustible materials of the area are adjacent to a fire sector, more extension of the façade (5 m) is required than the 1.5 m required in the first paragraph of part b). The first paragraph of part (b) indicates that compartmentalising walls must be carried out when there is no minimum 5 m separation between the perimeter of the area, and the combustible materials stored therein. This separation can be 0 m, 0.1 m or 4.9 m. In the case of 0 m (for example, a courtyard of an establishment that is used for storage in it and bordering the façade of the building that constitutes a fire sector), the perimeter of the area coincides with the façade of the building and therefore the fire-resistant wall that is required to be 1.5 m high above the height of stored combustible materials could be considered sufficient without it being necessary that it has 5 m as required in the second paragraph. In the event that it is not possible to prolong the façade, the use of horizontal stripes could be allowed as between fire sectors mounted on the outside (section 2.3 of Part 2 Outer Spreading). In view of the above, the following wording is proposed: *'b) Where there is no separation indicated in the preceding paragraph between the perimeter of the area and the combustible materials stored therein, compartmentalising ele-*	PA. It distinguishes the cases in which there is the façade of a building and those that do not, in which case it is a wall with nothing above. Therefore, the requirements are different in the case that there is a façade with, for example, windows where fire and smoke can enter. In any event, the section gives several options to be able to meet the requirements.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		there is no separation to the combustible materials, that part of the façade must also have the aforementioned fire resistance (EI or REI) and the dimensions indicated above. In addition, if the façade is higher than that indicated, it may not have areas whose fire resistance is less than the IS or REI requested up to at least 5 m above the height of the stored combustible materials.'	*ments must exist to ensure a minimum fire resistance of 60, 90 or 120 in areas of low, medium or high risk respectively (or REI 60, 90 or 120 if they have a bearing function) in such a way as to ensure the non-spreading of the fire in the area concerned. Where such compartmentalisation is carried out by means of vertical separators located within the perimeter of the area, such as walls, they shall have a height of at least 1.5 m higher than the height of the stored combustible materials and shall be extended 1.5 m in horizontal projection at their lateral ends.* *In the event that a part of the perimeter of the area is adjacent to a part of a façade of a building and there is no separation to the combustible materials, that part of the façade must also have the aforementioned fire resistance (EI or REI) and the dimensions indicated above. In addition, if the dimensions indicated above cannot be met, compartmentalisation may be carried out by a horizontal barrier 1m wide, located below the roof, fixed to the façade and at least half of the fire resistance required for it. In such a case, the barrier shall in no case be installed at a distance greater than 40 cm from the bottom of the roof of the adjoining building.'*	
350	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 1. Internal spreading **Section 1.5.b Page 66** Where such compartmentalisation is carried out by means of vertical separators located within the perimeter of the area, such as walls, they shall have a height of at least 1.5 m higher than the height of the stored combustible materials and shall be extended 1.5 m in horizontal projection at their lateral ends. In the event that a part of the perimeter of the area is adjacent to a part of a façade of a building and there is no separation to the combustible materials, that part of the façade must also have the aforemen-	In APQ 10 storage of chemicals in mobile containers, it says 1 m in height and in horizontal projections. Part 2 Outer spreading also refers to strips of 1 m. The range of fuels in industry is enormous and depending on the fuel and its form of storage the height of the flame can vary greatly. This height can be much or little depending on the case. There are cases where 50 cm is sufficient. Likewise, distance < m and EI wall are sometimes combined, so the possibilities are enormous. In many regulations, the adjective 'sufficient' is introduced, so that it is the responsibility of the project executor to ensure that the safety objective is met (in this case avoiding spreading). PROPOSAL: Change the text to: 'Where such compartmentalisation is carried out by means of vertical separators located within the perimeter of the area, such as walls, the walls shall be	PA. The distances of the first part of the section with which the APQ requests (1m) are aligned. On the second part, the casuistry has been better explained. With regard to the proposal of the submission not to put an exact value but the word 'sufficient', it is deemed that such wording would not be appropriate, and that it is preferable to put a minimum value.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		tioned fire resistance (EI or REI) and the dimensions indicated above. In addition, in the case of having a height higher than that indicated, it may not have areas whose fire resistance is less than the IS or REI requested up to at least 5 m above the height of the stored combustible materials.	sufficiently high and prolonged to prevent spreading in a manner equivalent to that referred to in point (a). This particularity must be justified. In the event that a part of the perimeter of the area is adjacent to a part of a façade of a building and there is no separation to the combustible materials, that part of the façade must also have the aforementioned fire resistance (EI or REI) with sufficient dimensions to prevent the spread in a manner equivalent to that referred to in point (a). This particularity must be justified.	
351	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 1. Internal spreading Clause from 1.5.c Page 66 In the event of areas with loading docks, habitual movements of materials in transit located at the exit of a building or other similar activities, if it is not possible to make the separation indicated in the above headings from the buildings of the industrial establishment concerned, appropriate actions shall be taken to consider the fire load and the possible risk that such activities may generate.	What exactly do you mean? Could this affect the parking spaces of the establishments and even trees near the façades? A clarification is requested.	A. The text has been amended to make it more detailed.
352	European Fire Sprinkler Network	Annex II Part 1 1.5. Fire areas in open spaces of type D layout (except those with low risk level 1), shall be separated from other areas of the same establishment by means of one of the following options: Annex II – Page: 6 of 32 (a) By means of a minimum separation of 5 m between the perimeter of the area and the combustible materials stored in it that can spread fire. In the case of storage of combustible materials of a height greater than 5 m, the separation between them and	There is no calculation establishing the separation between establishments. The risk posed by the wall of the premises is also not taken into account, and is not included in the analysis. If the wall is combustible with a response to the slow fire, this will allow spreading by façade. The building does not have inherent fire resistance and will depend on the façade. The best solution is to increase the separation distance between buildings. Proposal for amendment: 1.5. Fire areas in open spaces of type D layout (except those with low risk level 1), shall be separated from other areas of the same establishment by means of one of the following options: Annex II – Page: 6 of 32 (a) By means of a minimum separation of 5 m between the perimeter of the area and the combustible materials stored in it that can spread fire. In	R. With regard to fire areas, their requirements are set out in several different sections of Annex II, where, as a whole, several possible solutions are given depending on the case they have. On the other hand, this section does not mention the distance between two buildings. Placing such a requirement in this paragraph would not be fitting, and in any event, the proposal could be disproportionate. The distances between buildings are those set out in Annex I according to their typology, and the requirements in each case are already indicated in different sections of Annex II.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		the perimeter of the area shall be extended to the same distance as that height. In the event that the mentioned separation is between two areas of the same establishment, such a separation shall be permitted to be divided between the two areas.	the case of storage of combustible materials of a height greater than 5 m, the separation between them and the perimeter of the area shall be extended to the same distance as that height. In the event that the mentioned separation is between two areas of the same establishment, such a separation shall be permitted to be divided between the two areas. If the walls of two adjacent buildings have a fire response lower than Class B-s3, d0 the distance between buildings will double to 10 m, and for each additional metre of storage the separation will be 2 m more.	
353	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 1, 1.5.b) second paragraph 'In the event that a part of the perimeter of the area is adjacent...'.	Clarify if the location of **fire resistant doors or gates** is allowed on such façades.	A. Clarification has been added to the text.
354	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 1, section 1.5 '...**appropriate actions** shall be taken...0	It is a very vague paragraph, it would be good to specify more the type of '**appropriate actions**' acceptable	A. The text is modified to be more detailed, including concrete actions that can be taken.
355	CEPREVEN	Annex II, Part 1 Section 1.5 1.5. Fire areas in open spaces of type D layout (except those with low risk level 1), shall be separated from other areas of the same establishment by means of one of the following options: [...]	Since following this paragraph, under (a), (b) and (c) it refers at all times to possible stored materials, the following clarification is suggested in the text: *1.5. Fire areas in open spaces of type D layout (except those of low risk level 1)* ***in which fuel material storage activities are carried out****, shall be separated from other areas of the same establishment by means of one of the following options: [...]*	R. Not only storage activities are carried out in these areas. The current wording is correct.
356	CEPREVEN	Annex II, Part 1, section 1.5(c). In the case of areas with loading docks, habitual movements of materials in transit located at the exit of a building or other similar activities, if it is not possible to make the separation indicated in the above headings from the buildings of the industrial	The terms *appropriate actions*and *consider the fire load and possible risk* are very subjective, which can lead to very different interpretations.	A. The text is modified to be more detailed, including concrete actions that can be taken.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		establishment concerned, appropriate actions shall be taken to consider the fire load and the possible risk that such activities may cause.		
357	particular	Annex II RSCIEI, Part 1, section 1.5: 'Fire areas in open spaces type D (...) shall be separated **from other areas of the same establishment** by means of one of the following options:'	The requirements between fire areas and other establishments (of different owners) have not been regulated. This is a common case in conventional establishments, where use is made of the available outdoor areas up to the boundary of separation with the neighbouring establishment. With the wording available, it is unclear whether or not the same options can be used.	R. The subject of the comment is reflected in the outer spreading (Part 2, section 3).
358	CEPREVEN	Annex II, Part 1, section 1.6(a). a) For solid materials, or packaged materials, which are stored by stacking on top of each other (or grouped, stacked, bulked or otherwise equivalent):	We request that the application of this section be explicitly excluded from the storage of combustible materials inside equipment or spaces physically delimited along its entire perimeter. Otherwise, infrastructures as necessary for the environment as a biofilter on an surface area greater than 500 m^2 could not exist in Type D layouts. In this regard, it should be noted that the DEL defines *stack* as a *heap, pile or cluster that is made by placing on top of one another the pieces or portions of which consists of something* and heap as a *a set of things placed without order one on top of others*. Therefore, we understand that the term stack implies a lack of order and, ultimately, a certain instability. We therefore believe that our proposal could be in line with the spirit of this precept.	R. The text is sufficient as such, because there is already a paragraph (b) that opens the door to other forms of placement of the elements.
359	CEPREVEN	Annex II, Part 1, section 1.6(a). iv. Minimum stack spacing: 1.5 m. In addition, every 65 m there must be a stack spacing of at least 5 m wide. If the height of the stack is greater than 5 m, this separation shall be extended to the same distance as that height. v. Maximum length of each stack: 20 m. If the width of the passage between stack is greater than or equal to 2.5 m, the maximum length shall	It is not specified how the 65 m should be measured. If this is in terms of length, they will never be achieved with the limitations set out in point v. below.	A. The text has been restructured to make it clearer.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		be 45 m.		
360	CEPREVEN	Annex II, section 1.6(b). In other cases, the materials must be placed ensuring that the spread of the fire is limited and that extinction is facilitated, equivalent to that referred to under point (a). This particularity must be justified.	It is not clear whether *other cases* refer to non-solid or unpacked materials, or solid or packaged materials where the requirements of heading (a) cannot be met.	C. Other separate cases refer to anything not complying with the above for some justified reason. It is intended to provide the owner with options so that what the regulation calls for can be fulfilled in several ways, ensuring security while not asking for things that in some cases may be impossible to comply with.
361	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex II. S1 2. Concealed spaces. Passage of facilities through fire compartmentalisation elements.	This section is an adaptation of the DB SI 1-3 on concealed spaces. Passage of facilities through fire compartmentalisation elements in the CTE. The CTE includes comments that might, in part, be useful for the present RSCIEI, for example, those that refer to ducts of less than 50 cm^2 or fire gates in ducts.	A. Several clarifications on these aspects have been added to the text.
362	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex II. S1 3. Response to the fire of the constructive elements.	In point 3.1, Table 2.1.4 on classes of the fire response of construction elements is an adaptation, even in comments, to Table 4.1 Classes of fire response of the constructive elements of the DB SI 1-4 of the CTE. Includes an additional note (7) that refers to skylights on roofing. It includes points 3.2. and 3.3. which refer respectively to products included in false ceilings, raised floors and walls and cables located on false ceilings and raised floors.	C. The submission is a comment that does not include specific proposals.
363	particular	Tables 2.1.4 of the fire-response classes of construction elements are given on pages 8 of 32 of Annex II, point 3. This would apply to any other reference to the fire response that is noted in the Royal Decree.	In the column of ceilings and walls, what is known as envelopes, it should start from a resistance of at least A2 or A1, completely non-combustible. This is due to the fact that, otherwise, in the current situation of the insurance market, there is complete rejection of the insurance of companies in which envelopes, roof, enclosures, interior walls, etc. have a B classification or worse, etc. such as polyurethane PUR sandwich panels, polyisocyanurate PIR panels, etc. and any other fuel insulator such as plastic foams, even if it is minimally combustible. This is in favour of manufacturing industries, since there is currently a total refusal in all insurance companies to provide coverage in risks/companies with constructive typology that is not incombustible (A1 or A2). In the interest of searching for greater security of compa-	R. It is understood that the current wording is appropriate and that it is not appropriate to change it. In any event, the regulation leaves the freedom to install elements of equal or better benefits than the minimum indicated, so the owner of the establishment can choose to do so if he or she so wishes.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		Table 2.1.4.	nies, aligned as to improve the transfer of insurance.	
364	FEDAOC	Table 2.1. 4) Note (7) to Part 1. Internal spreading, no mention is made of the treatment that must be given to photovoltaic panels.	The new regulation should refer to the installation of photovoltaic panels on the roofs, as these are increasingly common facilities. This should be extended to other aspects such as considerations of the roofs, fire resistance of the structure.	A. A section on roof facilities with details on roof has been added to Annex IV. It sets out different requirements depending on the specific case.
365	ASSOCIATION OF ELECTRICAL EQUIPMENT MANUFACTURERS (AFME)	Annex II RSCIE, Part 1, section 3 of Table 2.1.4, sets requirements for Euroclasses, Note 2 states 'It includes pipes and ducts flowing through the designated areas without fire resistant coating. In the case of pipes with linear thermal insulation, the fire-response class shall be as indicated, but incorporating sub-index L.'	This text could be interpreted as applying to cable conduction systems such as tubes, protective channels and closed non-circular section ducts covered by the Low Voltage Directive and the Low Voltage Electrotechnical Regulation. The basic document SI of the CTE indicates in Part 1, section 4: 'The fire-response conditions of the components of electrical facilities (wires, tubes, trays, strips, cabinets, etc.) are regulated in their specific regulations.' Euroclass tests have already been defined for cables, but not defined for cable conduction systems. A new section 3.4 should be inserted with the following text: 'The response conditions of other components of electrical facilities (tubes, trays, protective channels, closed ducts of non-circular section for cables) are regulated in their specific regulations.'	A. The proposal has been added to the text.
366	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Annex II, Part 1.- Internal spreading, Table 2.1.4 Note 7:** For skylights in general and natural smoke and heat extraction aerators installed on roofs, the same requirements as ceilings and walls shall apply to them.	Special attention should be paid to penetrations or elements that interrupt a roof, such as skylights or aerators of natural smoke extraction since they are weak points that help the spread of the fire. Therefore, we propose in addition to the fire response required to the element that protects this area around, when there is an insulating material on the roof with a classification worse than A2-s1-d0. France has this point included in its regulations **PROPOSAL:** Note 7: Skylights in general and natural smoke and heat-extraction aerators installed on roofs shall be subject to the same requirements as ceilings and walls. In addition, in cases where the roof's insulation material has a fire rating worse than A2-s1,d0, these elements must be protected with a strip of material, with a width of 50 cm, throughout	R. It is understood that the current wording is appropriate and that it is not appropriate to change it. On the other hand, there are already requirements in Annex II to prevent the spread of a fire from one sector to another or from one establishment to another through the roof.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			the perimeter, and this material must have a fire response A2-s1, d0 or better.	
367	AFELMA, Association of Spanish Insulating Mineral Wool Manufacturers	Annex II, Part 1. - Internal spreading table 2.1.4 section 3.2. Products inside false ceilings or high floors, whether used for thermal insulation and for acoustic conditioning and those constituting, or carrying air conditioning or ventilation ducts, etc., must be of Class B-s3,d0 or more favourable. .	Despite trying to be consistent with the CTE-DB-SI in terms of fire-response requirements, the illogical approach of accepting 's3' as a minimum characterisation for smoke opacity continues to be maintained. We should remember that there is no class worse than the 's3', meaning it is like renouncing this requirement, and that this opacity will always counter the main object of the Regulation 'to establish the requirements that industrial establishments must meet with regard to their safety in the event of fire, to prevent the occurrence of fires and to give an adequate response in case of occurrence, establishing measures to facilitate its rapid detection, limit its spread and enable its extinction, with the aim of minimising the risk of damage to people, goods and the environment'. ***We request to change the minimum requirement of all Euroclasses that appear as 's3' to 's1'*** in order to facilitate both the evacuation work of the occupants themselves, **as** well as those of extinction by the fire fighting media.	R. It is understood that the current wording is appropriate and that it is not appropriate to change it.
368	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 1, Table 2.1.4 '**Car parks** and risk level sectors...'.	Delete '*Car parks*' (would be under 100 m^2)	R. The current text is correct. Table 2.1.4 already includes a note explaining this point.
369	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 1, Table 2.1.4 Classes of fire response of building elements	Refer to coatings in **type D** spaces, whether or not they are considered to be required to have a certain kind of response to fire	R. In Type D spaces, due to their layout, the smoke does not get trapped (and in fact, most do not even have constructive elements), meaning this requirement would not make sense.
370	TECNIFUEGO	RSCIEI Annex II Point 3 materials Section 3.1 (lights on roof)	(figure of the junction between two sectors and their roofs with skylights, and with a fire stripe 1 m wide below these and a metal sheet on top) Suggestion:	R. The current text is sufficiently clear on this point when it mentions skylights, as well as when it mentions the separation of sectors and establishments to prevent spreading over the roof (part 2,

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			If it were possible to be clarified by note, if to break the continuity of the skylights in two different sectors, since it is through the party wall) ~~It is enough, to put sheet metal, above the skylight, keeping the skylight or on the contrary~~, you must cut and remove the skylight and put the sheet metal in place. P.S. Because it is accepted or not according to experts.	section 2).
371	IPUR – Association of the Rigid Polyurethane Industry	Annex II, Part 1. - Internal spreading table 2.1.4 **Note 7:** For skylights in general and natural smoke and heat extraction aerators installed on roofs, the same requirements as ceilings and walls shall apply to them.	Insulation on the roofs is normally not bare, and therefore there are other elements such as membranes and normally metal substrates. Therefore, the classifications to individual elements, such as insulation, are incomplete and do not have to represent the behaviour of the real system since non-insulation systems are installed on their own. In any event, the standard for installation and assembly of insulation, EN 15715, offers the possibility of testing in final condition covered from the point of view of an internal fire. In terms of flame spreading, the Euroclass A2 and B have the same criteria. the differences arise in the fire load and for elements A2 have a limit of 3 MJ/Kg and the value in MJ/m² will depend on the density of the insulation. On the other hand, other insulations will have a value greater than 3 MJ/kg, but when they have a lower density, they have not such high values and the differences will not be as high as thought. IPUR proposal: Note 7: Skylights in general and natural smoke and heat-extraction aerators installed on roofs shall be subject to the same requirements as ceilings and walls.	R. The current wording of the text is clear and proportionate. No need to make changes.
372	IPUR – Association of the Rigid Polyurethane Industry	Annex II, Part 1. - Internal spreading table 2.1.4, section 3.2. Products inside false ceilings or high floors, whether used for thermal insulation and for acoustic conditioning and those constituting, or carrying air conditioning or ventilation ducts, etc., must be of Class B-s3,d0 or more favourable.	We understand that s3 is not any kind of limitation, and therefore we believe that the s2 would be better adapted to the level of risk set by the regulator the CTE DB SI. It should be remembered that there are normally no victims in the industry, and smoke damage in fires comes almost in most cases from the contents of industrial enclosures.	R. The current wording of the text is clear and proportionate. No need to make changes.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
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373	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX II. Part I. Point 3. Fire response of those of the construction elements Table 2.1.4 CLASS OF FIRE RESPONSE OF CONSTRUCTION ELEMENTS	The legislator is requested to clarify the kind of fire response required for mezzanine floors, whether they are floors, ceilings, or both, as they are commonly carried out even in wood agglomeration.	A. Clarification has been added in Annex IV, in the section on mezzanines.
374	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Table 2.1.4 CLASSES OF FIRE RESPONSE OF CONSTRUCTIVE ELEMENTS Note 7: For skylights in general and natural smoke and heat extraction aerators installed on roofs, the same requirements as ceilings and walls shall apply. However, large skylights on roof shall always be of class B-s1,d0 or more favourable. For the purposes of the provisions herein, they shall be understood as skylights to those elements isolated or integrated in the roof, formed by transparent or translucent materials that allow light to enter the building. Skylights which are more than 10 m in length shall be deemed large skylights or, where there are several clustered skylights which are less than 2 m apart and occupy more than 10 m in length.	The treatment or demands that must be required of photovoltaic panels, which are so proliferating in the building, are missing. There is a lot of news about fires on photovoltaic panels, and it is urgent that preventive measures be addressed.	A. A section on roof facilities with details on roof has been added to Annex IV.
375	KREAN S.COOP	ANNEX II Table 2.1.4	What options are there to justify the fire response in existing industrial units prior to the application of the 2004 DR?	C. The submission is a comment that does not include specific proposals. In any case, it should be noted that the regulation is not retroactive. Cases of renovation or similar, cases are dealt with in the articles.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
376	FACEL	Page 69, Annex II RSCIEI, Part 1, Chapter 3, paragraph 3.3, in the following text *'3.3. Cables inside false ceilings or raised floors shall be of at least class Cca-s1b,d1,a1. In the case of underground galleries, the cables situated therein shall also comply with these functions, unless such galleries are compartmentalised.'*	Proposal: Delete the last sentence 'unless such galleries are compartmentalised'. Add 'evacuation routes' in situations where cables are needed from these performances. Justification: In addition to the spread of the fire, the required classification has a performance in terms of emission, acidity and opacity of the fumes that prevent the affecting the extinction systems, facilitating both the extinction and the evacuation of the gallery in all cases, whether compartmentalised or not, as well as in the evacuation routes. Proposal: 3.3. Cables located inside false ceilings or raised floors, in galleries and on evacuation routes shall be at least class Cca-s1b,d1,a1.	R. The current wording of the text is clear and proportionate. No need to make changes.
377	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex II. S1 4. Technical service facilities.	Point 4.1 refers to electrical, thermal, refrigeration, mechanical energy use facilities or the movement of materials, maintenance and lifts shall be governed by their specific regulations. Point 4.2 refers to electrical cables feeding equipment that must remain in operation during a fire. For this protection, it mentions technical solutions, but no details.	C. The submission is a comment that does not include specific proposals.
378	FACEL	Page 69, Annex II RSCIEI, Part 1, Chapter 4, paragraph 4.2, in the following text *'4.2. In the case of electrical cables feeding equipment that is to remain in operation during a fire, the electrical cables shall be protected to maintain the electrical current for at least the time for which the equipment is intended to operate. This protection can be achieved through different technical solutions, such as using fire resistant ducts or building elements, or by the use of cables with intrinsic fire resistance.'*	Proposal: Add the following sentence at the end of the text: Cables that are in accordance with standard UNE 211025 and for which an intrinsic fire resistance equal to or greater than that required for each particular case is declared to be in conformity with the above requirements. Justification: In this case, there is a standard UNE that applies to this type of cables of intrinsic fire resistance, generically known as (AS+). The reference to the standard used is aligned with that used in the draft Royal Decree 'alteration of the REBT'.	A. Clarifications have been added to the text on this matter: Cables with intrinsic fire resistance. (Although the added text is not 100 % in line with the initial proposal of the submission, it is understood that the above matter is fully covered, and has been written after consultation with industry experts and associations.)
379	INDUSTRY	RSCIEI	'Note 5: Stairs and elevators that communicate different fire	A. The note is amended to make it

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	SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	Note 5 just below table 2.1.3	sectors shall be compartmentalised' In industrial units. the stairs that communicate with the mezzanines are rarely compartmentalised. It is a disproportionate prescription for industry in general	clearer.
380	Service for Preventing and Extinguishing Fires and Rescue of the City of Vitoria-Gasteiz	Annex II section 1.4: fire response of the construction systems of façade. This submission would also affect DB-SI 2	PROPOSAL: Add The façade construction systems shall not reduce the fire resistance of the defined stripes at any time to avoid the risk of external spreading. Explanation: with the current wording you can put a fuel material (D-s3,d0 on façades of height up to 10 m and > 10 %) on a strip EI60 that separates a warehouse on the ground floor from a public activity on floor 1	R. The response and fire resistance requirements of each of the elements are independent of each other.
381	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex II to the RSCIEI, Part 2(1) '1. Party walls and façades of buildings'	It is proposed to add the word 'concrete slabs' in the title of the section, taking into account that table 2.2.1 also concerns them. Replace with: '1. Party walls, concrete slabs and façades of buildings»	A. Added 'concrete slabs' to the text
382	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX II. Part 2. External spreading Point 1. Table 2.2.1. Note 4.	'Note 4: Where the industrial establishment is adjacent to another establishment, the table values shall apply to the adjacent walls of the establishment concerned only when the two establishments are adjacent (with no separation distance between them), or when they are at a separation distance of up to 3 m. This requirement shall not apply where the separation distance exceeds 3 m, free of combustible goods or intermediate elements capable of spreading fire.' As defined in the RSCIEI project type B establishment, and after the analysis already commented of high NRI 8, the façade walls have to be EI240 on each side, making a total of 480 minutes. Thus, a type B building does not cease to be a type C building that is allowed to reduce the distance to neighbouring establishments until it reaches touch, but with fire resis-	PA. Note 4 has been rewritten to make it clearer. On the other hand, the comments on Annex I and the NRI are addressed in that annex, meaning the risk calculations that come out are proportionate and adequate. Of the rest of the submission, there is no need to make changes to layouts A, B or C, which have been raised, as the current classification is deemed to be appropriate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			tance of 240 minutes on the façade. However, with the NRI calculation proposed in Annex I, even with EI240, the existence of Type B establishments is unfeasible, as in high NRI 8 they are not allowed. Therefore, it is again proposed to pass this type of buildings of independent structure and compartmentalisation independent to Type C, requiring them structural stability and resistance to the spreading of fire on façades.	
383	APICI	Annex II, Part 2. - External spreading Section 1. Party walls and façades of buildings	On many occasions, it is intended to solve the spread of the fire including stripes as defined in Section 1. However, it is not a valid solution if a fuel material is kept under the strip, as the fire will spread anyway. It is proposed to add as an additional point: 1.7. In those party walls or façades where it is chosen to include a strip on the plane of the median or façade, it must be ensured that the material under the strip will be non-combustible or material A1.	R. It is understood that the current text is correct, adequate and sufficiently clear. No changes are necessary.
384	ROCKWOOL Peninsular, SAU	Annex II, Part 2. - External spreading Section 1. Party walls and façades of buildings	On many occasions, it is intended to solve the spread of the fire including stripes as defined in Section 1. However, it is not a valid solution if a fuel material is kept under the strip, as the fire will spread anyway. It is proposed to add as an additional point: 1.7. In those party walls or façades where it is chosen to include a strip on the plane of the median or façade, it must be ensured that the material under the strip will be material, at least, of fire-response class A2-s1,d0.	R. It is understood that the current text is correct, adequate and sufficiently clear. No changes are necessary.
385	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex II. S2 1. Party walls and façades of buildings.	The diagrams only refer to adjoining sectors or establishments. For your better understanding, it would be advisable to complete this section with the following graphs: – In point 1.1, the same separate establishment 3 m or less being considered the same sector. – In point 1.2, establishment in contact with stairway or protected passage. On the other hand, it would be necessary to mention or specify how to proceed in the case of renovation or restoration, or to refer to Point 4 of the First Additional Provision for these cases. Additionally, accompany these cases with	R. Graphics have been placed in the sections where it has been deemed appropriate, but it is not deemed necessary to put new graphics in sections where the description of the text is sufficient. On the renovation of buildings, texts have been included that address this issue in the articles.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			graphs that help to understand possible alternative solutions.	
386	particular	Annex II RSCIEI, Part 2. External spreading, section 1.1, in the following text: 'Note 5: In the event that two buildings in the same industrial establishment are at a separation distance of 3 m or less, they shall be deemed the same fire sector unless there are separating elements between the two, and these must provide a minimum compartmentalisation of IS 60, 90 or 120 for sectors of low, medium or high risk respectively (or EI 30 in case of application of Note 4 to Table 2.1.2 in both buildings).' --- Annex II RSCIEI, Part 2. External spreading, section 1.2 (b), in the following: '*b) In the case of façades between two different establishments forming an angle of less than 90°, or façades facing a distance of up to 3 m, those parts of the façades separated at a distance of 3 m or less shall be deemed adjoining walls and the provisions of note 4 to Table 2.2.1. shall apply*. (Figure 2.8). In the event that these façades belong to the same industrial establishment, the provisions of note 5 to Table 2.2.1. shall apply.'	First of all, it is not understood because this note which mentions the sectoring between sectors of the same establishment in the external spreading section. Second, it generally applies a compartmentalisation between sectors without taking into account the layout of these buildings with respect to neighbouring establishments, which contradicts Table 2.1.2 of Part 1 of Annex II, which for example between sectors of a type C establishment requires EI 30, EI 60 and EI90 for low, medium or high risk sectors respectively. It is directly considered that the establishment is B. It is deemed that this note should be removed from this section and a note 6 should be added in part 1, which reads: 'Note 6: *In the case that two buildings of the same industrial establishment are at a separation distance of 3 m or less, they shall be deemed the same fire sector unless there are separating elements between them, which comply with the provisions of Table 2.1.2, or in Table 2.1.3 in the case that it applies Note 4 to this paragraph in one of the two buildings, provided that the separation is free of combustible goods or intermediate elements capable of spreading the fire. Note 3 to this section shall also apply to doors included in these enclosures.*' ----- If the above submission is accepted, it should read: in the case of façades between two different establishments forming an angle less than 90°, or façades facing a distance of up to 3 m apart, those parts of the façades separated at a distance of 3 m or less shall be deemed adjoining walls and the provisions of note 4 to Table 2.2.1 shall apply. (figure) *Where these façades belong to the same industrial establishment, the provisions of note 6 to Table 2.1.2 shall apply*.'	PA. This note is separated, and moved to a separate paragraph to improve clarity, but keep it in the same section. (The note is in the outer spreading section because these types of fires spread across the outside of the building.) The text has been rewritten to put requirements more aligned with those applicable to the separation between sectors of the same establishment. Regarding the proposal of the façades, the text is adapted.
387	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 2. External spreading Table 2.2.1. Page 70	The R of the structure of the A_H, which are those with party wall, is lower than this EI at all risk levels (R90/R120/R180 at low/medium/high risk and R60/R90/R120 if they have sprinklers and SCTEH). Likewise, if considered mediating the	PA. The tables in each section have their particularities and demand more or less requirements according to their specific casuistry. The requirements are suffi-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			façade of the B (note 4) the R would be R60/R90/R120 for a B without sprinklers and R30 with sprinklers and SCTEH. In order to ensure that the failure of elements with R smaller than those of the party wall does not drag the latter, a justification by calculation should be required. The structure is a set of interconnected elements, depending on the junctions, the bracing, the degree of use (load status) and the resistance of the elements, the failure of one can be very important or not. On the other hand, to demand the same to an A_H that a B is not logical, since the new B will each have its façade with that EI. PROPOSAL: Apply this table only to the A_H and require them to justify that the local failure of the structural elements does not affect the party wall or cause a generalised collapse. Allow to undertake activities at high risk 8 under those conditions.	ciently defined, and there is no need to ask for additional calculations. On the other hand, with regard to the case of type B, which differs from the A, the text of footnote 4 to the table is amended to better consider the specific case.
388	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 2. External spreading Table 2.2.1. Page 70 Note 4: Where the industrial establishment is adjacent to another establishment, the table values shall apply to the adjacent walls of the establishment concerned only when the two establishments are adjacent (with no separation distance between them), or when they are at a separation distance of up to 3 m. This requirement shall not apply where the separation distance exceeds 3 m, free of combustible goods or intermediate elements capable of spreading the fire.	This distance of 3m does not appear consistent with that of section 1.5, which requires 5 m or an IS wall to prevent spread within the establishment itself. A façade without fire resistance does not prevent the spread to third parties if it has fuel nearby. The distance to prevent spreading within an establishment should be no greater than the distance to prevent the spread between establishments. On the other hand, it must be borne in mind that in order for a firewall enclosure to maintain its performance, it cannot be damaged by an eventual deformation or structural collapse. PROPOSAL: Change the text to: 'Note 4: In type B establishments the table values will be applied with a 50 % reduction to the entire façade. The exterior shall be free of combustible goods or intermediate elements capable of spreading the fire. It can be justified that there is no spreading with the combination of IS walls and safety distances. In order to apply reductions in the fire resistance of the structure (tables 2.5.2 and 2.5.3), it must be justified that the localised collapse of the elements with less fire resistance does not damage the façade. Allow high-risk 8 activities under these conditions.'	PA. On the first part of the comment, there is no need to make any changes: Distances have been differentiated in event it is a building or an area in an open space. In this second case, a greater distance is requested. On the other hand, the distance of 3 m in buildings is consistent with the classification in Annex I. On the other hand, with regard to the proposal for footnote 4, the text of the note is amended to better consider the specific case (although not fully in line with the proposal of the submission).

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
389	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 2. External spreading Table 2.2.1. Page 70 Note 5: In the event that two buildings of the same industrial establishment are at a separation distance of 3 m or less, they shall be deemed the same fire sector unless there are separating elements between the two, and these must provide a minimum compartmentalisation of IS 60, 90 or 120 for sectors of low, medium or high risk respectively (or EI 30 in case of application of Note 4 to Table 2.1.2 in both buildings).	As indicated in the initial comment to Table 2.1.3, it does not seem wise to require the same for B and C, regardless of risk and distance to neighbour. It should also be borne in mind that the size of the fire sectors of layouts B and C x 4 can be increased compared to the current RSCIEI. PROPOSAL: Change the text to remain as follows: 'Note 5: In the event that two buildings in the same industrial establishment are at a separation distance of 3 m or less, they shall be deemed the same fire sector unless there are separating elements between the two, and these must provide a minimum compartmentalisation of IS 60, 90 or 120 for low, medium or high risk sectors respectively (or half if it applies note 4 to Table 2.1.2 in both buildings).'	R. If you apply note 4 of Table 2.1.2 it is consistent to ask for EI 30. The current text is consistent with the set of requirements. (On the other hand, note that footnote 5 has been rewritten due to other submissions)
390	European Fire Sprinkler Network	Annex II Table 2.2.1 Note 4: Where the industrial establishment is adjacent to another establishment, the table values shall apply to the adjacent walls of the establishment concerned only when the two establishments are adjacent (with no separation distance between them), or when they are at a separation distance of up to 3 m. This requirement shall not apply where the separation distance exceeds 3 m, free of combustible goods or intermediate elements capable of spreading fire	*Proposal for amendment:* *Note 4: Where the industrial establishment is adjacent to another establishment, the table values shall apply to the adjacent walls of the establishment concerned only when the two establishments are adjacent (with no separation distance between them), or when they are at a separation distance of up to 3 m. When buildings are separated by more than 3 m, the requirements for two adjoining walls and their separation distance should be based on the building's generated exposure. Calculations should be carried out to demonstrate that the heat radiation flow to the adjacent building wall or the relevant boundary is less than 12 KW/m². Where the building is equipped with a fixed automatic fire-extinguishing system throughout the sector, the calculation shall consider that the fire exposure of the building is reduced by half.*	R. It should be remembered that the owner of an establishment may not know what kind of establishments or buildings he or she has around, or that these may change over time. Therefore, the requirements in this section have been fixed, taking as a variable only the distance and not other factors that can change over time.
391	European Fire Sprinkler Network	Annex II Table 2.2.1	In a fire scenario of a burning building, there may be exposure to the outer surface of the roof. This should be detailed in the Notes, to remove any ambiguity: Annex II Box 2.2.1: Proposal for amendment: Note 6: When no higher fire resistance is required, as indi-	R. The requirements for roofs are already defined in Part 2, section 2.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			cated in this section, the roof surface must have a performance of at least BROOF(t1) during the first 6m from the separation limit.	
392	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex II to the RSCIEI, Part 2, section 1.1, first paragraph '1.1. In order to limit the risk of spreading the fire to other establishments, the minimum fire resistance of the separating elements of the establishment concerned with the other establishments shall be as follows:'	It is proposed to amend this section to clarify that Table 2.2.1 of this section also affects the upper forging of the sector separating the establishment from other establishments. Replace with: '1.1 In order to limit the risk of spreading the fire to other establishments, the minimum fire resistance of the building elements delimiting a fire sector of the establishment concerned with other establishments, such as walls and ceilings, shall be as follows:'	R. The current text is clear enough. No changes are necessary.
393	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex II to the RSCIEI, Part 2, section 1.1 Table 2.2.1, title 'Intrinsic risk level'	Replace with 'Intrinsic Risk Level of the Sector'	R. This way of writing the header of the table is the same in all tables and does not lend confusion, since the concept is already defined in Annex I.
394	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex II to the RSCIEI, Part 2, section 1.1 Table 2.2.1, Note 4 to the table 'Note 4: Where the industrial establishment is adjacent to another establishment, the table values shall apply to the adjacent walls of the establishment concerned only when the two establishments are adjacent (with no separation distance between them), or when they are at a separation distance of up to 3 m. This requirement shall not apply where the separation distance exceeds 3 m, free of combustible goods or intermediate elements capable of spreading fire.'	Where it puts 'walls adjoining the establishment' to replace with 'walls adjoining the sectors of the establishment'	R. The current text is correct and clear enough. No changes are necessary.
395	Prevention Service of the Direc-	Annex II to the RSCIEI, Part 2, section 1.1 Table 2.2.1, Note 5 to the table	This note does not reflect well the situation of establishments consisting of several buildings, all of them type C, but	A. Note 5 has been rewritten and moved to a separate paragraph.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	torate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	'Note 5: In the event that two buildings in the same industrial establishment are at a separation distance of 3 m or less, they shall be deemed the same fire sector unless there are separating elements between the two, and these must provide a minimum compartmentalisation of IS 60, 90 or 120 for sectors of low, medium or high risk respectively (or EI 30 in case of application of Note 4 to Table 2.1.2 in both buildings).'	separated between them less than 3 m, since in this case the compartmentalisation of the sectors would be allowed to be EI 30, 60 or 90 for low, medium or high risk sectors respectively. It is proposed to replace this with: 'Note 5: Where two buildings in the same industrial establishment are at a separation distance of 3 m or less between them, they shall be deemed the same fire sector unless the separating elements between the two comply with the requirements of separating walls between fire sectors, in accordance with section 1 1.4 of this Annex.'	
396	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 2, Table 2.2.1 Note 5: '...minimum compartmentalisation**of EI 60, 90 or 120**...'	Replace: '...*minimum compartmentalisation* more unfavourable according to Table 2.1.2 or 2.1.3 where applicable'	R. The current text is correct and is clearer to understand than the proposal of the submission.
397	Official College of Industrial Engineers of the Valencian Community	Annex II, Part 2: External spreading. Table 2.2.1. Note 4	Annex II, page 10. Where it says: '*When the industrial establishment is adjacent to another establishment, the table values shall apply to the adjacent walls of the establishment considered only when both establishments are adjacent*' **It is proposed:** *'When the industrial **building** is adjacent to **another building** of the establishment, the values in the table shall apply to the **enclosures** adjacent to the establishment considered only when both establishments are adjacent'*. Enclosures do not have to be walls. Adjoining enclosure and adjacent enclosure should be defined. It is essential even if it goes without saying, but it must be defined.	A. Note 4 has been rewritten to make it clearer (although the text differs from that of the submission)
398	KREAN S.COOP	ANNEX II Table 2.2.1 Note 4	Why not use the same safety criteria as used in the Chemicals Regulation in terms of safety distances or, where appropriate, protections by means of resistant walls?	PA. The text of the note is amended in response to previous submissions. However, it should be remembered that it appears the APQ does not refer to this case, but to external storage.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
399	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 2, section 1.2 '**flat** façade', '**smooth** façade'	Replace these non-architectural terms with 'façades at 180º'	R. The current text is correct and perfectly explained. In particular, it is explained in Table 2.2.2.
400	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Part 2. External spreading 1. Party walls and façades of buildings 1.2. In order to limit the risk of horizontal external spreading of the fire through the façade between fire sectors of the same industrial establishment, or to another establishment, or to a protected staircase or a protected corridor, the following considerations shall apply: a) When a construction element embarks on a façade, in the same industrial establishment, the fire resistance (EI, or REI in the elements having a load-bearing function) of that façade shall be at least 50 % of that required of that construction element, in a strip whose width will be such that the points of the façade that do not reach the values of fire resistance indicated, must be separated at least a distance 'd' in ANNEX II – Page: 11 of 32 horizontal projection, depending on the angle 'α' formed by the exterior planes of the façade, as follows: ...	As required in point 1.2 (a) above, on elements that go to the façade, in which 1 m is established on each side of the party wall, it would mean 2 m in total between gate gaps of industrial buildings. Our industrial estates are formed in a large percentage by industrial buildings in row, in which the gates of different Owners do not usually have that distance of 2 m between them. The approval of this measure would make it impossible to use many industrial units, since the only solutions would be: – Install vertical element to fire resistant façade, which is normally not admitted by town halls. – Change the gate for a smaller one, which in many cases would not allow access to large vehicles such as trucks inside the industrial units. A measure that would leave most of today's industrial estates out of use does not make much sense. We will have to look for alternatives.	A. To avoid this problem, the option of being able to reduce the distance if it is distributed between the two establishments has been added.
401	Professional Association of Fire Technicians (APTB)	Annex II Part 2 1.3. In order to limit the risk of vertical external spreading of the fire through the façade between fire sectors of the same industrial establish-	It is not considered in vertical spreading when the façades of the two sectors are setback or advanced. (figure) It is proposed to apply to them the same solution as is envisaged, for the same case, in the comment to Part SI 2 section 1(3) of the DBSI of the CTE:	R. The text addresses the most common situations. We understand that there may be other more complex and less frequent situations in which the project executor must analyse and justify on a case-by-case basis. Trying to include in

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ment, or to another establishment, or to a protected staircase or a protected corridor, the following considerations shall apply: When a concrete slab subdividing fire sectors commits to a façade, the fire resistance (EI, or REI in the elements having a bearing function) of it shall be at least 50 % of that required for that construction element, in a strip whose height shall be at least 1 m, measured on the plane of the façade.	Other façade layouts For layouts and variants not contemplated in the articles, French regulations may be helpful, clearly exposed and summarised in the article 'Vertical spreading of fire in encounters of forgings and rearranged façades' (Germán Pérez Zabala, periodical PREVENCION DE INCENDIOS, No 61, first quarter 2014). This text could be included in the technical guide, or, if we did not want to refer to the article and we would like to include the proposed solution, in the text of the Royal Decree itself, the diagrams and the solution adopted could be included, which is simply applying the following formulas: *Upper size of the projection (dss):* If at ≥ 0.15 m → Upper size = a (metres) If a < 0.15 m → Upper size = 0 *Lower size of projection (dis):* If b > 0.80 m → Lower size = b - 0.80 (metres) If b ≤ 0.80 m → Lower size = 0 Vertical size (C): $C = c_1 + c_2 + c_3$ *(metres)* And bear in mind that it must be fulfilled that DSS + dis + C ≥ 1 m	the section all possible situations that might exist would make it excessively long and complex.
402	particular	**Annex II RSCIEI, Part 2, section 1.4.** in the following text: '1.4. The fire-response class of façade building systems occupying more than 10 % of their surface area shall be at least and depending on the overall height of the façade: D-s3,d0 on façades up to 10 m high; C-s3,d0 on façades up to 18 m high; B-s3,d0 on façades above 18 m.'	Taking into account that in Annex II RSCIEI Part 1, section 3, Table 2.1.4. the fire response of the most unfavourable wall covering materials established is C-s2,d0 and that the contribution to the fire and rate of smoke spreading is more favourable than the most unfavourable as indicated in Annex II RSCIEI Part 2, section 1.4. (D-s3,d0), it would seem logical that this contribution to the fire and rate of spreading in the fire response of the building systems of façades, was at least the same as the most unfavourable one established in the wall coverings in the internal spreading, i.e. in this section replace: 'a) D-s3,d0 on façades up to 10 m high; b) C-s3,d0 on façades up to 18 m high; c) B-s3,d0 on façades above 18 m.' With:	R. The casuistry of the façades are different from those of other parts of the buildings. It makes no sense to compare elements that are inside buildings with those on the outside.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			"a) C-s2,d0 on façades up to 18 m high; b) -s2,d0 on façades above 18 m.'	
403	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 2.- Outside Spreading, Section 1, 'Party walls and façades', subsections 1.4. and 1.5. 1.4. The fire-response class of façade building systems occupying more than 10 % of their surface area shall be at least and depending on the overall height of the façade: D-s3,d0 on façades up to 10 m high; b) C-s3,d0 on façades up to 18 m high; c) B-s3,d0 on façades above 18 m. This classification must be deemed the final used condition of the construction system, including all materials that make up layers contained in the interior of the façade solution and which are not protected by a layer that is at least EI30.' 1.5. Insulation systems located inside ventilated chambers must have at least the following fire-response classification based on the overall height of the façade: D-s3,d0 on façades up to 10 m high; b) B-s3,d0 on façades up to 28 m high; c) A2-s3,d0 on façades above 28 m.	Despite trying to be consistent with the CTE-DB-SI in terms of fire-response requirements, the illogical approach of accepting 's3' as a minimum characterisation for smoke opacity continues to be maintained. We should remember that there is no class worse than the 's3', so it is like renouncing this requirement, and that this opacity will always go against the main object of the Regulation 'to establish the requirements that industrial establishments must comply with with regard to their safety in the event of fire, to prevent the occurrence of fires and to give an adequate response in case of occurrence, establishing measures to facilitate its rapid detection, limit its spread and enable its extinction, with the aim of minimising the risk of damage to people, goods and the environment'. **PROPOSAL:** Add: Accessible façades: façades that allow the staff of the SEIS to access it as access through it to the interior of the building. The kind of fire response of the building systems of these façades shall be at least: a) B-s1,d0 in façades up to 10 m, b) A2-s1,d0 on façades of more than 10 m.	R. It is not deemed necessary to make this kind of differentiation. The concept of accessible façade is defined in relation to its accessibility for firefighters, but it is not distinguished from other types of façade in the rest of the requirements.
404	European Fire Sprinkler Network	*Annex II* *Part 2. External spreading* *1.4. The fire-response class of façade building systems occupying more than 10 % of their surface area shall be at least and depending on the overall height of the façade:* *a) D-s3,d0 on façades up to 10 m*	This type of ventilated façades will have to undergo a full-scale test to demonstrate their behaviour. Fire tests on a smaller scale are not sufficient to determine the behaviour of these materials in a fire. Proposal for amendment: Test materials according to 'FM 4411 Examination Standard for Cavity Wall Systems' or an international equivalent stan-	R. The proposed requirement could be disproportionate and difficult to achieve at present. In any event, the benefits to be fulfilled by these elements are already perfectly detailed in the current text.

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		high; *b) C-s3,d0 on façades up to 18 m high;* *c) B-s3,d0 on façades above 18 m.* *This classification must be deemed the final used condition of the construction system, including all materials that make up layers contained in the interior of the façade solution and which are not protected by a layer that is at least EI30.'* *1.5. Insulation systems situated inside ventilated chambers must have at least the following fire-response class, based on the total height of the façade:* *a) D-s3,d0 on façades up to 10 m high;* *b) B-s3,d0 on façades up to 28 m high;* *c) A2-s3,d0 on façades above 28 m.* *The vertical development of ventilated façade chambers in continuity with fire resistant slabs that separate fire sectors must be limited. The conclusion of E 30 barriers may be deemed a valid procedure for limiting such vertical development.*	dard.	
405	AFELMA, Association of Spanish Insulating Mineral Wool Manufacturers	Annex II, Part 2.- Outside Spreading, Section 1, 'Party walls and façades', subsections 1.4. and 1.5. 1.4. The fire-response class of façade building systems occupying more than 10 % of their surface area shall be at least and depending on the overall height of the façade: a) D-s3,d0 on façades up to 10 m high;	Despite trying to be consistent with the CTE-DB-SI in terms of fire-response requirements, the illogical approach of accepting 's3' as a minimum characterisation for smoke opacity continues to be maintained. We should remember that there is no class worse than the 's3', so it is like renouncing this requirement, and that this opacity will always go against the main object of the Regulation 'to establish the requirements that industrial establishments must comply with with regard to their safety in the event of fire, to prevent the occurrence of fires and to give an adequate response in case	R. It is not deemed necessary to make this kind of differentiation. The concept of accessible façade is defined in relation to its accessibility for firefighters, but it is not distinguished from other types of façade in the rest of the requirements.

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		b) C-s3,d0 on façades up to 18 m high; c) B-s3,d0 on façades above 18 m. This classification must be deemed the final used condition of the construction system, including all materials that make up layers contained in the interior of the façade solution and which are not protected by a layer that is at least EI30.' 1.5. Insulation systems situated inside ventilated chambers must have at least the following fire-response class, based on the total height of the façade: a) D-s3,d0 on façades up to 10 m high; b) B-s3,d0 on façades up to 28 m high; c) A2-s3,d0 on façades above 28 m.	of occurrence, establishing measures to facilitate its rapid detection, limit its spread and enable its extinction, with the aim of minimising the risk of damage to people, goods and the environment'. ***We request to change the minimum requirement of all Euroclasses that appear as 's3' to 's1'*** in order to facilitate both occupant evacuation work and extinction by fire fighting media. Add: **Accessible façades:** façades that allow the staff of the SEIS to access it as access through it to the interior of the building. The kind of fire response of the building systems of these façades shall be at least: B-s1,d0 in façades of height up to 10 m A2-s1,d0 on façades of a height of more than 10 ms.	
406	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 2, Section 1.4, b) '**C-s3,d0** on façades up to 18 ms'	Replace: *B)* '**C-s2,d0** *on façades up to 18 m in height'* Taking into account that, in Table 2.1.4, wall coverings are require a C-s2,d0 and solutions in industrial buildings are generally a single panel, a single construction elements, so the responses should be matched. Another option is to lower to **C-s2,d0** the class in Table 2,1,4, as in DB SI	R. The casuistry of the façades are different from those of other parts of the buildings. It makes no sense to compare elements that are inside buildings with those on the outside.
407	IPUR – Association of the Rigid Polyurethane Industry	Annex II, Part 2.- Outside Spreading, Section 1, 'Party walls and façades', subsections 1.4. and 1.5. 1.4. The fire-response class of façade building systems occupying more than 10 % of their surface area shall be at least and depending on the overall height of the façade: a) D-s3,d0 on façades up to 10 m high;	In terms of lateral flame spreading, the criterion for A2 and B is the same. In addition, many industrial processes cannot be carried out with Euroclass A2 products. If this were done, the industrial process would be impossible. Therefore, a B-s3,d0 should be considered. However, as recognised in the CEN/TC 127 WG4 'Fire response', the Euroclasses are not suitable for the assessment of the behaviour of façade fire. In this regard, large-scale trials should be deemed most European countries do. In addition, the steering group of the European consortium responsible for developing new Euro-	R. It is not deemed necessary to make this kind of differentiation. The concept of accessible façade is defined in relation to its accessibility for firefighters, but it is not distinguished from other types of façade in the rest of the requirements.

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		b) C-s3,d0 on façades up to 18 m high; c) B-s3,d0 on façades above 18 m. This classification must be deemed the final used condition of the construction system, including all materials that make up layers contained in the interior of the façade solution and which are not protected by a layer that is at least EI30.' 1.5. Insulation systems situated inside ventilated chambers must have at least the following fire-response class, based on the total height of the façade: a) D-s3,d0 on façades up to 10 m high; b) B-s3,d0 on façades up to 28 m high; c) A2-s3,d0 on façades above 28 m.	pean test method recommends countries that do not have and are on track to use the BS 8414 or the DIN 4102. Lastly, there are independent reports of claims in which it is shown that a certain group of products with Euroclass B offer excellent performance in the event of fire not spreading the fire and being its minimum contribution. IPUR proposal: Accessible façades: façades that allow the staff of the SEIS to access it as access through it to the interior of the building. The fire-response class of the building systems of these façades shall be at least B-s3,d0 or large scale test (BS 8414)	
408	particular	**Annex II RSCIEI, Part 2, section 1.5.** In the following text '1.5. Insulation systems situated inside ventilated chambers must have at least the following fire-response class, based on the total height of the façade: D-s3,d0 on façades up to 10 m high; B-s3,d0 on façades up to 28 m high; A-s3,d0 on façades of a height exceeding 28 m.'	Taking into account that in Annex II RSCIEI Part 1, section 3, Table 2.1.4. the fire response of the most unfavourable wall covering materials established is C-s2,d0 and that the contribution to the fire and rate of smoke spreading is more favourable than the unfavourable ones indicated in Annex II RSCIEI Part 2, section 1.5. (D-s3,d0), it would seem logical that this contribution to the fire and rate of smoke spreading in the fire response of the insulation systems located inside the ventilated chambers, was at least the same as the most unfavourable one established in the wall coverings in the internal spreading, i.e. in this section <u>replace</u>: 'a) D-s3,d0 on façades up to 10 m high; b) B-s3,d0 on façades up to 28 m high; c) A-s3,d0 on façades of a height of more than 28 m.' <u>With</u>: 'a) C-s2,d0 on façades up to 10 m high; B-s2,d0 on façades up to 28 m high; A-s2,d0 on façades of a height exceeding 28 m.'	R. The casuistry of the façades are different from those of other parts of the buildings. It makes no sense to compare elements that are inside buildings with those on the outside.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
409	particular	**Annex II RSCIEI, Part 2, section 1.6**. In the following text '1.6. For façades 18 m high or less whose lower level is accessible to the public from the exterior grade or from a roof, the fire-response class of the construction systems mentioned in subsection 1.4 and of those situated inside the ventilated chambers, where applicable, must be at least B-s3,d0 up to a height of at least 3.5 m.'	Taking into account that in Annex II RSCIEI Part 1, section 3, Table 2.1.4. the fire response of the most unfavourable wall covering materials established is C-s2,d0 and that the rate of smoke spreading is more favourable than the more unfavourable rate indicated in Annex II RSCIEI, Part 2, section 1.4. (Bs3,d0), it would seem logical that this rate of smoke spreading in the fire response of the building systems of façades, was at least the same as the most unfavourable rate established in the wall coverings in the internal spreading, that is, in this section replace: '1.6. For façades 18 m high or less whose lower level is accessible to the public from the exterior grade or from a roof, the fire-response class of the construction systems mentioned in subsection 1.4 and of those situated inside the ventilated chambers, where applicable, must be at least **B-s3,d0** up to a height of at least 3.5 m.' With: '1.6. On façades of a height of 18 m or less the lower start of which is accessible to the public from the outside surface or from a roof, the fire-response class, both of the building systems referred to in paragraph 1.4 and of those inside ventilated chambers where appropriate, must be at least **B-s2,d0** up to a height of at least 3.5 m.'	R. It is understood that casuistry is not the same in interior walls as in exterior façades, and therefore the requirements of both cases are different.
410	particular	Annex II – façades Include a point with a text for in the event that when concrete panels or similar are used, it is ensured that the overturning to the outside of the building is prevented throughout its façade. Example: 'when concrete panels are used or similar, their laying system shall be such as to prevent their fall in the form of overturning to the outside and there is a drag effect between the panels or parts that the enclosure on its entire façade'.	COMMENT: The fire services have been able to verify in several fires the risk of placing concrete panels vertically and their fall in the form of overturning to the outside so that the entire façade falls although not all of it is involved in the fire.	C. The text does not detail specific solutions, but general requirements. The solution that is used must be well designed and installed.
411	ANDIMAT (Na-	Annex II, Part 2. - External spreading	In the current text. the mention of the need for **strip test**,	R. The text calls for the required fire re-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	tional Association of Insulating Material Manufacturers)	Section 2. Roofs Text on strips	the test standard of which does not correspond to the harmonised test standards, has disappeared and therefore a test protocol was included in the Application Guide. At the least, the text appearing in the previous version should be retained or the Test Protocol included in the new wording of the standard: *The justification for the fire resistance of that strip shall be carried out by type test. This test shall be carried out under the final conditions of use, including brackets or clamping systems.*	sistance. The ways to test this resistance has already been specified elsewhere.
412	ANDIMAT (National Association of Insulating Material Manufacturers)	Annex II, Part 2. - External spreading Section 2. Roofs Following text and sketch: '*Where the above options are not possible (in renovations of existing buildings), the compartmentalisation may consist of a horizontal barrier 1 m wide, located below the roof, fixed to the party wall and of at least half of the fire resistance required of that construction element. In such a case, the barrier shall in no case be installed at a distance greater than 40 cm from the bottom of the roof and its permanence should be ensured in case of collapse of parts of the roof not resistant to fire. Above that strip there may be no building elements or materials capable of transmitting the fire.*' Figure 2.14: Compartmentalisation on roof by means of a barrier under the roof.	We believe it is appropriate to specify the conditions of the maximum spacing distance between the strip and the roof that currently generates many doubts in the market by adding the following text and replacing the current sketch with the following text and sketches: *Where the above options are not possible (in the case of renovations of existing buildings), the compartmentalisation may consist of a barrier one 1m wide, located below the roof, fixed to the party wall and at least half of the fire resistance required of that building element. In this case, the maximum distance from the surface of the element constituting the protection against fire of the strip (plate, mortar surface, etc.) to the bottom of the roof at this point must be a maximum of 40 cm, measured at the far end of the party wall. It will therefore be appropriate for the strip to follow as far as possible the line (travel) of the roof.* *(An alternative figure 2.14 ia proposed)*	R. The current text is sufficiently detailed. While the comment's proposal was timely, however, it did not differ much from the current text, nor was it deemed necessary to change the current figure.
413	AFELMA, Association of Spanish Insulating Mineral	**Annex II, Part 2. - External spreading** Section 2. Roofs **2.5** In the meeting between a roof	Special attention should be paid to penetrations or elements interrupting a roof, such as skylights or aerators of natural smoke extraction, since they are weak points that help the	R. The requirement of the current text is sufficient to achieve the desired objective. No further requirements need to

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	Wool Manufacturers	and a façade belonging to fire sectors or different establishments, and where that façade has areas whose fire resistance is not at least 50 % of the IE of the construction element, materials occupying more than 10 % of the outer coating or finish of the roof areas located less than 5 m away from the vertical projection of any façade area above that roof, the fire resistance of which is not at least 60 (including skylights, skylights and any other element of lighting or ventilation), must belong to fire-response class BROOF (t1).	spread of the fire. Therefore, we propose that this area be protected, when there is an insulation material with a classification below than A2-s1,d0. France has this point included in its regulations. **It is proposed to add to the wording:** **2.5** In the meeting between a roof and a façade belonging to fire sectors or different establishments, and where that façade has areas whose fire resistance is not at least 50 % of the IE of the construction element, materials occupying more than 10 % of the outer coating or finish of the roof areas located less than 5 m away from the vertical projection of any façade area above that roof, the fire resistance of which is not at least 60 (including skylights, skylights and any other element of lighting or ventilation), must belong to fire-response class BROOF (t1). **In addition, in cases where the roof insulation material has a fire rating worse than A2-s1,d0, these elements must be protected with a strip of material, with a width of 50mm, throughout the perimeter, and this material must have a fire response A2-s1,d0 or better.**	be added.
414	TECNIFUEGO	RSCIEI Part 2. External spreading 2. Roofs 2.5. In the meeting between a roof and a façade…	The following text is proposed: In the meeting between a roof and a façade belonging to fire sectors or different establishments, and where that façade has areas whose fire resistance is less than 50 % of the IS of the construction element, materials that occupy more than 10 % of the outer coating or finish of the roof areas located less than 5 m away from the vertical projection of any façade area above that roof, whose fire resistance is not at least EI 60 (including skylights, skylights and any other lighting or ventilation element), must belong to fire-response class BROOF (t1).	A. The text has been changed, which says the same as the current one but in a simpler way.
415	IPUR – Association of the Rigid Polyurethane Industry	Section on Roofs and Article 1, Object, section 2 The fire protection measures laid down in the current provisions governing industrial, sectoral or specific activities shall take precedence over those established in this Regulation, which in these cases shall only be ap-	There is currently no harmonised European test to assess roof systems with photovoltaic facilities. Therefore, the only option to assess roofs according to standard EN 13501-5.	PA. A section on roof facilities with details on roof has been added to Annex IV. It sets out different requirements depending on the specific case.

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		plied in a complementary manner, and for those aspects not provided for therein.		
416	IPUR – Association of the Rigid Polyurethane Industry	**Annex II, Part 2. - External spreading** Section 2. Roofs **2.5** In the meeting between a roof and a façade belonging to fire sectors or different establishments, and where that façade has areas whose fire resistance is not at least 50 % of the IE of the construction element, materials occupying more than 10 % of the outer coating or finish of the roof areas located less than 5 m away from the vertical projection of any façade area above that roof, the fire resistance of which is not at least 60 (including skylights, skylights and any other element of lighting or ventilation), must belong to fire-response class BROOF (t1).	There is no technical evidence to support a certain insulation material to limit the spread on roofs. In addition, it must be taken into account that on the surface of the roof, PVC and TPO membranes are installed which are organic. Therefore, the only test available today for the evaluation of an external fire on roof, the CEN/TS 1187 should be used to reach the Broof(t1) according to EN 13501-5.	C. The submission does not contain specific proposals. On the other hand, the current wording already refers to the Broof cited in the submission. The current wording is understood to be correct.
417	APICI	Annex II, Part 2. - External spreading Section 2. Roofs	On many occasions, it is intended to solve the spread of the fire including stripes as defined in Section 2. However, it is not a valid solution if a fuel material is kept under the strip, as the fire will spread anyway. It is proposed to add as an additional point: 2.6. In those roofs where it is chosen to include a strip on the plane of the roof, it must be ensured that the material under the stripe will be non-combustible or material A1.	R. It is understood that the current text is appropriate and sufficiently clear. It is not deemed appropriate to add further requirements.
418	Official College of Physicists (COFIS)	Part 2. External spreading 2. Roofs	Assess whether for different industrial units already constructed at different heights, the following solution will be valid: (image of two industrial units together with roofs of different heights) This option represented applies in some Autonomous Communities (for example, in Catalonia), which also has a more restrictive regulation, or interpretation of the standard. The CTE itself in its DB SI, Part SI 2, 2 Roofs, indicates that '*As an*	R. The rules of procedure do not fall into particular rare situations, as it would be impossible to collect all particular cases. If clarifications on specific cases were necessary, they could be added to the guide to the regulation.

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			alternative to the above condition you can choose to extend the party wall or compartment element 0.60 m above the finish of the roof'. It puts this in singular, does not specify above the finishes of roofs.	
419	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex II. S2 2. Roofs.	It would be advisable that the comment in point 2.3, on renovations of existing buildings, if appropriate, extend it to other cases where renovations may take place and also refer to Point 4 of the First Additional Provision.	R. Generally, the reforms are reflected in the articles. There is no need to detail the cases here. On the other hand, the paragraph stated that you can use 'When the above options are not possible', which is understood to be in renovations of existing buildings.
420	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 2. External spreading Section 2.3. Page 79 Where the above options are not possible (in the case of renovations of existing buildings), the compartmentalisation may consist of a horizontal barrier 1m wide, located below the roof, fixed to the party wall and at least half of the fire resistance required of that building element. In such a case, the barrier shall in no case be installed at a distance greater than 40 cm from the bottom of the roof and its permanence should be ensured in case of collapse of parts of the roof not resistant to fire. Above this strip, there may be no construction elements or materials capable of transmitting the fire.	It does not seem possible to guarantee the permanence of a strip if parts of the roof fall off (enclosure or structural elements with less or no fire resistance). It is true that it is unfeasible to apply the other options to existing buildings, and so the proposed option is better than nothing. The current RSCIEI includes a test protocol that has disappeared in the RD proposal, how is the fire resistance of that strip guaranteed? PROPOSAL: Include the method for justifying the fire resistance of the strips and amend the text as follows: 'Where the above options are not possible (in the case of renovations of existing buildings), the compartmentalisation may consist of a horizontal barrier 1m wide, located below the roof, fixed to the party wall and at least half of the fire resistance required of that construction element in accordance with the test and classification procedure XX. In this case, the barrier will in no case be installed at a distance greater than 40 cm from the bottom of the roof. Above this strip, there may be no building elements or materials capable of transmitting the fire.'	R. The text calls for the required fire resistance. The ways to test this resistance has already been specified elsewhere.
421	ANAPE. National Expanded Polystyrene Association	Part 2. External spreading 2. Roofs 2.5. In the meeting between a roof and a façade...	The wording is difficult to understand, if it is possible to divide into more paragraphs. In the meeting between a roof and a façade belonging to fire sectors or different establishments, and where that façade has areas whose fire resistance is less than 50 % of the IS of the construction element, materials that occupy more than 10 % of the outer coating or finish of the roof ar-	A. The text has been changed, which says the same as the current one but in a simpler way.

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			eas located less than 5 m away from the vertical projection of any façade area above that roof, whose fire resistance is not at least EI 60 (including skylights, skylights and any other lighting or ventilation element), must belong to fire-response class BROOF (t1).	
422	particular	Annex II RSCIEI, Part 2. External spreading, section 3. External spreading of industrial establishments located in open spaces, in the following text: 'a) Be separated from adjacent establishments by a distance between the stored combustible materials and the limit of the establishment as referred to in Part 1, section 1.5.(a) unless the applicable planning rules ensure such distance between the fire area and the boundary; or'	It should say: *'a) Be separated from adjacent establishments by a distance between the stored combustible materials, either with the combustible materials of the fire areas of the adjacent establishment, or from the buildings of the adjoining establishment as referred to in Part 1, section 1.5(a), or';*	R. The current text is correct and clear enough. No changes are necessary.
423	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 2, Article 3: If there are structures in the fire areas, it must be justified that their possible collapsing does not affect the adjacent establishments.	Clarify Specify this point or, better, remove it	A. The paragraph has been rewritten, to make it clearer.
424	CEPREVEN	Annex II, Part 2, section 3 In the case of fire areas located in open spaces (except those with low risk level 1), these will: be separated from adjacent establishments by a distance between the stored combustible materials and the limit of the establishment as referred to in Part 1, section 1.5(a), unless the applicable planning regulations ensure such distance between the fire area and the boundary; or b) be separated from adjacent establishments by compartmentalising elements ensuring a minimum fire resis-	As possible stored materials are referred to at all times under (a) and (b), the following clarification in the text is suggested: *In the case of fire areas* ***in which fuel material storage activities are carried out*** *located in open spaces (except those with low risk level 1), these shall: […]*	R. The current text is correct. No changes are necessary.

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		tance of IS 120, 180 or 240 for low, medium or high risk areas respectively, with the same considerations as in Part 1, section 1.5(b). In the case of structures in the fire areas, it must be justified that their possible collapsing does not affect the adjacent establishments.		
425	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex II. S2 3. External spreading of industrial establishments located in open spaces.	In the classification of buildings and open spaces according to their layout, in point 1.2 on open space layouts, Figure 1.5, Type D layout (open space), implies that these spaces are exempt and do not collide with other establishments. However, in section 3(b), by stating that it must be separated from adjacent establishments by compartmental elements ensuring minimum fire resistance, it implies that these open spaces will sometimes not be exempted. It would be appropriate to accompany sections 3(a) and 3(b) by explanatory diagrams or graphs, as resolved in sections 1 and 2 on party walls, façades and roofs.	R. When talking about open spaces in the text, the different cases are already explained and the requirements that apply in each case are established (for example, if they are separated or if they are close to buildings). This way, the text is already sufficiently explained and it is not estimated that further explanatory graphics are required.
426	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex II. S3 1. Compatibility of evacuation elements.	It is not clear what is meant by 'common building elements' in sections 1.1 and 1.3.	A. It has been rewritten to say 'common areas' to make it clearer.
427	particular	ANNEX II Part 3. Evacuation of occupants 1. Compatibility of evacuation elements 1.1. Where industrial and non-industrial establishments coexist in a building of type AV or AH, the evacuation through the common elements of the building must meet the conditions laid down in the CTE DB-SI, ...	Buildings where only industrial establishments coexist are exempt from the evacuation conditions. A multi-industrial building could have unlimited evacuation distances: Proposal: Amendment according to first and second submission and: Amend text: 1.1. When in a building of type A_V or A_H industrial establishments coexist '*with other industrial or*' non-industrial, ...	R. No one is exempt from fulfilling the conditions. Part 3, section 1, sets out a series of cases and, as the case may be, must comply with one or the other. All of the cases are gathered.
428	particular	Section 2. Calculating the occupation of Annex II of the new Fire Safety Regulation in industrial establishments (RSCIEI).	In the case of buildings or establishments for use Warehouses intended for mini warehouses under rental or community of owners, the expressions for the calculation of occupancy are not applicable, as there is no 'labour documentation governing the operation of the activity'.	A. A text is included in the CTE DB-SI clarifying this issue.

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			The occupancy density provided for in Table 2.1 of Part SI 3 'Evacuation of occupants' of the Basic Document DB-SI could be used for 'Files, warehouses', or one occupant for each mini warehouse (on the safety side). I understand that with the current text, this section is not regulated, since it is not industrial establishments, but the articulation of the RSCIEI project that regulates them does not refer to CTE-DB SI for calculating occupation.	
429	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex II. S3 2. Calculating occupancy.	In calculating the occupation, for the calculation of the number of people, 'p' occupied by the fire sector refers to the work documentation that regulates the operation of the activity. It would be advisable, as reflected in the DB SI3-2 of the CTE on calculating occupation by uses, to attach an appropriate table to this regulation that avoids having to resort to other texts to be able to extract this data.	R. The proposed methodology is based on that of the previous regulations of 2004 and is deemed appropriate.
430	SFPE Spain	ANNEX II S3 3. Evacuation of industrial establishments located in buildings	In note 6: [...For sectors classified as high risk level 8, where these contain stored materials capable of exploding or instantly igniting upon contact with a flame or spark...] This phrase has no quantitative value, and can be interpreted as read. It should be reformulated, or removed.	A. Note 6 has been deleted.
431	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex II. S3 3. Evacuation of industrial establishments located in buildings.	The number of exits (3.1.1) shall be based on Section 3 of DB SI3 of the CTE, with some extra consideration and the length of escape routes (3.1.2) will prevail in Table 2.3.1. with respect to Table 3.1 of Part SI 3 of CTE DB-SI. It is not clear, when referring to evacuation routes through different sectors, whether it can be given at the same time through industrial and non-industrial uses. In dimensioning evacuation routes (3.2), it also uses section 4 of Part SI 3 of the CTE DB-SI with a degree of consideration. For protecting stairs (3.3.1), specific conditions shall be established in this regulation, in the protected corridors (3.3.2) the DB SI of the CTE shall be considered with some additional consideration. Doors located on evacuation routes (3.4) and signage of exits and evacuation directions (3.5) are also regulated by Sections 6 and 7 of DB SI 3 respectively, with some consideration included in these regulations.	C. The submission is a comment that does not include specific proposals. In any event, it is deemed that the current wording is correct and clear enough.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
432	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 3. Evacuation of occupants Table 2.3.1. Page 83. Note 4.	Section 8.3 also allows SCTEH not intended for the evacuation of persons. This section should clearly state that the increase can only be made if the system is activated with detection, and aims at improving evacuation conditions. On the other hand, it has been shown in numerous performance studies and industrial fire statistics that evacuation is not the main risk in high establishments, so in general, SCTEH is not necessary to ensure evacuation. PROPOSAL: **Amendment of the text so that it reads as follows:** 'Note 4. (b) In fire sectors equipped with a smoke and heat control system according to section 8.3 of Annex III, which is activated with detection and aims at improving evacuation conditions, routes may be increased by 25 %. c) In sectors located on the exit floor of the building, with two or more direct exits to the outside, with a floor clearance of 8 m or more, protected by a fixed automatic extinguishing system compatible to operate during the evacuation phase ~~and a system for the control of smoke and heat according to paragraph 8.3 of Annex III: T~~ the routes may be increased to a ~~100 % compared to the values indicated in the table, without being able to exceed a~~ maximum of 90 m. Where the sector has several floors or mezzanines, the above may only be applied to evacuation from evacuation sources located on the exit floor of the building.'	A. The note is changed to make the smoke control required in each case more precise. (Note that the amended text does not comply 100 % with the proposal of the submission, however, it addresses the matter in its entirety.)
433	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 3, Table 2.3.1 Note 5: '...of class **A1 or A2**,'	Classes A1 or A2, intended for construction products, cannot be applied to materials in general	A. Clarification has been added to the text.
434	KREAN S.COOP	ANNEX II Table 2.3.1 Note 5	Why not create a plan with evacuation times and not lengths?	C. There can certainly be many ways of expressing requirements. In this case, a form has been chosen that is deemed sufficiently objective and simple, which is with lengths, as already established in the previous regulation of 2004.
435	SFPE Spain	Annex II Table 2.3.1	It is not understood why the column has been added (Route	R. The function of this columns is that

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			distance without alternative) since it does not provide any improvement. It is proposed to remove the column (Route distance without alternative).	when there is more than one alternative output, they are separated enough to fulfil their function. Otherwise, two exits could be put together, which for practical purposes would be the same as putting a single one, which is not what is intended.
436	particular	Annex II RSCIEI, Part 3, section 3.1.1: 'Número de salidas: se basará**n** en lo dispuesto....'	Typo. Replace 'basarán' with 'basará' (agrees with number, not with exits).	A. Typo has been corrected.
437	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX II. Part 3 Evacuation of the occupants Table 2.3.1. Note 4. Point c)	'In sectors located on the exit floor of the building, with two or more direct outlets to the outside, with floor clearance equal to or greater than 8 m, protected by a system automatic extinguishing fixed compatible for operating during the evacuation phase and a smoke and heat control system according to section 8.3 of Annex III: The routes may be increased up to 100 % compared to the values indicated in the table, without being able to exceed a maximum of 90 m. Where the sector has several floors or mezzanines, the above may only be applied to evacuation from evacuation sources located on the exit floor of the building.' COMMENT: Does it follow from what has been underlined that the objective of the design of the SCTEH according to UNE 23585 is the EVACUATION OF OCCUPANTS? It is requested that the legislator clarify this objective, since the prescriptive design marked by UNE 23585 is different depending on the objective, and even contradictory: 1. the limit temperatures of the fume layer are different if the objective is evacuation or intervention by firefighters (which influences the aerodynamic surface), 2. the opening of the SCTEH should be automatic with fire detection if the objective is evacuation, or manual if the objective is protecting the intervention equipment) In the same way, it is requested that it be clarified which or what the objectives are of the SCTEH for the drafting of projects of equivalent security measures, so that third-party entities can assess the fulfilment of these objectives by the	PA. Note 4 is changed so that this aspect is better reflected, in line with other submissions received. On the other hand, the design of the SCTEH may have several objectives, and the corresponding sections of Annexes II and III of the Regulation detail when they must have a specific objective, or not, depending on the case.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			provisional route.	
438	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX II. Part 3 Evacuation of the occupants Table 2.3.1. Note 4. Point c)	'In sectors located on the exit floor of the building, with two or more direct outlets to the outside, with floor clearance equal to or greater than 8 m, protected by a system automatic extinguishing fixed compatible for operating during the evacuation phase and a smoke and heat control system according to section 8.3 of Annex III: The routes may be increased up to 100 % compared to the values indicated in the table, without being able to exceed a maximum of 90 m. Where the sector has several floors or mezzanines, the above may only be applied to evacuation from evacuation sources located on the exit floor of the building.' **It is proposed to add**: In the case where the sector has several floors or mezzanines, only the above may be applied to evacuation from evacuation sources located on the exit floor of the building or exit of the plant, defined as such: – Direct exits to external stairs or exterior corridors per façade in the case of several floors or mezzanines, – Outputs to protected stairs or corridors, – Protected evacuation tunnels – Sector changes at the same level at which the evacuation originates, through firewall doors with the same IA as the compartment element, even if there is no independence vestibule. **Reason**: The free height of 8m completely limits this note in case of mezzanines, even built in concrete, and in multilevel naves. In the final paragraph it mentions the case that there are several floors or mezzanines will only be valid for evacuation routes located on the exit floor of the building. 'Plant departures' should be deemed the end of evacuation. However, in the CTE DB SI sector changes must be made through lobbies so that they are considered 'departure of floor'. Nevertheless, in industrial units above 8 m, this RSCIEI project considers that pedestrian crossings may lack a lobby of independence.	R. Note 4 is intended to be applied in the starting plant only. This should not be extended to other cases.
439	ASSOCIATION OF DEVELOPERS, OWNERS AND	ANNEX II. Part 3 Evacuation of occupants	'Note 6: For sectors classified as high risk level 8, where these contain stored materials capable of bursting or instantly ignition upon contact with a flame or spark and	A. Note 6 is deleted as a result of other submissions, so there is no need to change the wording.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Table 2.3.1. Note 6.	which spreads rapidly, the maximum length of evacuation routes shall be 15 m in the event of an exit; or, up to 25 m to the nearest exit in cases of two or more departures and with a distance of no alternative of 15 m. (When applying this note, the coefficients in note 4 may not be applied.' **It is proposed** to establish the minimum quantities of these products to be considered, referring for example to the scope of the RAPQ (RD656/2017). For example: there could be a single pallet of hydrogel in a 40,000m² warehouse, nullifying the possibility of applying footnote 4 in the entire sector.	
440	SFPE Spain	Table 2.3.1 Note 4 (c) In sectors located on the exit floor of the building, with two or more direct outlets to the outside, with ***floor free height*** equal to or greater than 8 m, protected by a fixed automatic extinguishing system compatible to operate during the evacuation phase and a smoke and heat control system according to paragraph 8.3 of Annex III: The routes may be increased up to 100 % compared to the values indicated in the table, without being able to exceed a maximum of 90 m.	definition of ***floor free height***?	A. The wording of the note is changed to make it clearer.
441	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	RSCIEI Annex II Part 3 evacuation 3.1.3. *Other considerations*	Where it says 'The requirements of this section do not apply to the conditions of evacuation of areas for exclusive use by personnel specialised in maintenance, repairs, etc., whose access and evacuation are particular, such as a lift pit, a gallery of facilities, a roof for restricted use, etc., or to items intended for such personnel, such as scales or accesses.' Is it considering areas of zero occupation, where there is no presence of staff other than for maintenance?	C. The submission is a comment that does not include specific proposals. It is considering areas that are only used for eventual maintenance activities, to which the people who access have the appropriate training. (More examples could be given in the text, but the most frequent ones have been put in.)
442	particular	Annex II Part 3. Evacuation of occupants ...	It requires compartmentalisation of any ladder intended for more than 25 people regardless of their ascending evacuation height, e.g. 51cm ascending evacuation height (three	A. The proposed text has been added.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		3.3. Protection of stairs and corridors 3.3.1. Ladders intended for descending evacuation shall be protected when they exceed the evacuation height of 14 m. Ladders for ascending evacuation shall be protected when they are intended for more than 25 persons, or save evacuation heights greater than 2.8 m.	steps) and regardless of ceiling heights, e.g. 7m. Redefine: 3.3.3. ... Ladders for upward evacuation shall be protected when *'they save evacuation heights greater than 1.50 m'* and are intended for more than 25 persons, or save evacuation heights greater than 2.8 m.	
443	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 3, section 3.3.1 Final paragraph	It is preferable to maintain the definition of ***'floor exit'*** set in DB SI, which conditions when the start of the ladder is or not. Furthermore, as set out in Annex II, I Definitions. xiv *Floor exit*, its definition should be taken from CTE DBSI so everything is contradictory	R. The above paragraph has been written with a specific focus on the case studies of industrial establishments. The text is kept in.
444	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex II to the RSCIEI, Part 3(3.4) '3.4. Doors located on evacuation routes The characteristics of doors located on escape routes shall be in accordance with section 6 of Part SI 3 of the CTE DB-SI, with the following consideration: a) these conditions shall not apply to the doors of refrigeration rooms. In any event, doors located on evacuation routes must be easily operable manually.'	It is proposed to separate the conditions for a better interpretation of the section. Replace with: '3.4. Doors located on evacuation routes The characteristics of doors located on escape routes shall be in accordance with section 6 of Part SI 3 of the CTE DB-SI, with the following considerations: a) these conditions shall not apply to the doors of refrigeration rooms. b) in any case, doors located on evacuation routes must be easily operable manually.'	A. The text is been changed.
445	particular	Annex II RSCIEI, Part 3, section 3.4: Doors located on evacuation routes. The characteristics of the doors **located on evacuation routes** shall be in accordance with section 6 of Part SI 3 of the CTE DB SI.	Section 6 of Part SI 3 of the CTE DB SI lays down requirements only for: – Floor or building exit doors – Doors planned for the evacuation of more than 50 persons For all other doors – which may be on evacuation routes – no requirements are set. The wording used in the proposal for a new regulation does not clarify whether it refers to the same as section 6 of SI 3 regulates, or whether, conversely, it refers to the fact that	PA. The text has been rewritten to make it clearer, in line with what the submission calls for. However, the latest proposal of the submission for Type C is not added because it is not deemed necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			any door that is part of the evacuation route must comply with what is required for which section 6 of SI 3 regulates. A literal interpretation points to the latter, which could be excessive in the industrial sphere, for example in the pharmaceutical sector. It seems reasonable to apply the requirement only to floor and building exits, or those intended for more than 50 people, as DB SI does. In such a case, the wording should be redrafted. On the other hand, it has been eliminated to be able to use sliding doors easily operable manually, in type-C buildings, I propose to maintain that exception that already existed.	
446	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex II to the RSCIEI, Part 3(4.2) '4.2. Notwithstanding the foregoing, in Type D layouts that have covered areas, structures or other assimilable areas, such areas shall also comply with the evacuation requirements required of buildings in section 3 and which apply to them.'	It is proposed to remove the reference to structures or other assimilable areas to avoid confusion in interpretation. Where it states 'that have covered areas, structures or other assimilable areas' to replace with 'that have covered areas'	A. The wording has been changed.
447	particular	Annex II (page 26 of 32), Part 4. Intervention of firefighters indicates '*Both urban planning and the conditions of design and construction of industrial establishments, in particular the immediate environment, their accesses, their façade gaps, etc. must enable and facilitate the intervention of the Fire and Rescue Extinction Services (hereinafter, SEIS), according to the provisions of this section'*	In the scope indicated in the regulations, it is not indicated that municipal regulations (e.g. general urban development plans) will be affected, nor does it indicate a time or medium for adjusting the urban planning to the provisions of this regulation. The article itself ends up 'exempting' of obligation to local authorisations, leaving something empty of content. A general regulation of measures to ensure the intervention of firefighters in all population centres would seem logical and coherent.	C. The scope of this regulation is industrial establishments, meaning this is what is intended to be regulated. This regulation is not intended to regulate public roads, which fall within the competence of municipalities. (Note that this approach is the same as CTE DB-SI for non-industrial buildings.)
448	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX II. Part 4 Point 1. Approach and environment conditions.	In existing buildings, it is very difficult to meet the conditions of approach and environment, especially the manoeuvring spaces. **It is requested** to clarify whether this point is intended for new developments only.	R. The requirements of Annex II are intended for cases where this is provided for in the rules of procedure. The clarifications on this matter are those indicated in the articles.
449	Superior Council	RSCIEI. Annex II. S4	Where industrial and non-industrial establishments coexist,	C. The submission is a comment that

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	of the Colleges of Architects of Spain	1. Approach and environment conditions	with most of the building being for non-industrial use, Part 5 of the DB SI shall apply. Where industrial and non-industrial establishments coexist, with most of the building being for industrial use, points 1.2 and 1.3 of this Regulation shall apply.	does not include specific proposals.
450	THE COMMUNITY OF MADRID FIRE BRIGADE	**Annex II. Part 4.** 1.2. Approach to buildings with industrial use. 1.2.1. The **approach roads** of SEIS vehicles to the manoeuvre spaces referred to in section 1.3.1, must meet the following conditions: Minimum free width in straight stretches: 5 m. Minimum free height or gauge: 4.5 m. Carrying capacity of the road: 20 kN/m2. 1.2.2. In curved stretches, the running rail must be delimited by the trace of a circular crown whose minimum radii must be 5.3 m and 12.5 m, with a free width for circulation of 7.2 m.	Annex II. Part 4. It is proposed to include in point 1.2.1.(a) the requirement of a 7 m-wide road in case access to the establishment is unique, for entry and exit, in order to allow quick access to SEIS vehicles during an intervention.	R. The proposed requirement could be disproportionate, and its implementation would not be feasible in many establishments. The current widths are adequate, and allow access to trucks.
451	Professional Association of Fire Technicians (APTB)	Annex II Part 4 1.2. Approach to buildings with industrial use. 1.2.1. The approach roads of SEIS vehicles to the manoeuvre spaces referred to in section 1.3.1, must meet the following conditions:	There are approach roads that can have two senses of circulation, fire trucks that enter and leave the manoeuvring space. A width of 5 m does not guarantee that the two vehicles can pass at once. A width of 7 m would be necessary by proposing the following text: 1.2.1. The *approach roads* of SEIS vehicles to the *manoeuvre spaces referred to in* section 1.3.1, must *meet the following conditions*: *Minimum free width in straight stretches: 5 m as a general rule*, ***except if this road should serve at the same time as the entry and exit route of SEIS vehicles, in which case it must be 7 m.***	R. The proposed requirement could be disproportionate, and its implementation would not be feasible in many establishments. The current widths are adequate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		a) **Free minimum width in straight stretches: 5 m.** b) Free minimum height or gauge: 4.5 m. c) carrying capacity of the road: 20 kN/m2.	*Minimum free height or gauge: 4.5 m.* *Carrying capacity of the road: 20 kN/m^2.*	
452	Professional Association of Fire Technicians (APTB)	Annex II Part 4 1.2. Approach to buildings with industrial use. 1.2.2. In curved stretches, the running rail must be delimited by the trace of a circular crown whose minimum radii must be 5.3 m and 12.5 m, with a free width for circulation of 7.2 m.	If as indicated in point 1.2.1. the minimum free width in straight stretches of the access road to the manoeuvring space can be 5 m and as indicated in paragraph 1.2.2. on curved sections, the running rail must be delimited by the trace of a circular crown whose radius must be 5.3 m and 12.5 m, with a free width for circulation of 7.2 m, the only way to achieve both requirements, with the width of the vial of 5 m, for a 90º curve would be as follows: (figure) The curved path to meet the two conditions is a bit rare, for that reason, we believe that it is much more logical that the access road has a width of **7 m**, and that the running rail will be delimited by the trace of a circular crown whose minimum radius should be **5 m** and **12 m** (12 m – 5 m = 7 m), since the resulting route would be much more reasonable: (figure)	R. The current requirement is technically appropriate. The width of the access road is sufficient, and the proposed text is aligned with the CTE DB-SI and the RSCIEI in force in 2004, having not presented problems in its implementation.
453	THE COMMUNITY OF MADRID FIRE BRIGADE	1.3.1. Buildings with a floor area above 1,000m² or with a descending evacuation height greater than 9m, must have a **manoeuvre space** fit for passage and placement of SEIS vehicles that meets the following conditions along the façades on which the accesses are located: Free minimum width: 6m. Free height: that of the building. Maximum distance of the SEIS vehicle to the façade of the building: 15m.	The criterion of this Fire Corps is to have manoeuvre space in any case, regardless of the evacuation height. While a consideration has been included to this request, which is to include the floor area limit above 1,000 m^2, it is deemed to be insufficient. For this reason, it is proposed to reduce the descending evacuation height so that it is **less than 6 m**, instead of the proposed 9 m. This requirement is also a claim for the CTE currently in force. The reason for this, is that from 6 m, it is necessary to use a self-staircase vehicle. With a portable sliding ladder, which is the usual resource of fire engines, the 9m height of practical use is not reached for firefighters to enter that level through	R. The text has been written with the aim of being proportionate and asking for more or less requirements depending on the specific case. It is understood that the current wording is consistent with the objectives it seeks, and so the current text is maintained.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		Maximum distance to the accesses to the building necessary to be able to reach all of its areas: 30m. Maximum inclination: 10%. Resistance to ground brinelling: 100 kN over 20 cm Ø.	the façade gap; even more difficult would be a rescue manoeuvre. Portable sliding ladders are not effective for these tasks at more than 6m of evacuation height. For boarding a concrete-slab floor at more than 6m of evacuation height or for an evacuation by façade gap at that level, it is already necessary the use of self-ladder vehicle, and this requires a manoeuvring space that is not required if no more than 9m of evacuation height are reached.	
454	KREAN S.COOP	Annex II Part 4 point 1.3.4	It is not possible to meet these requirements in existing buildings prior to the application of this regulation, especially for 'multi-customer' industrial units. The same happens with the mandatory façade accessible in this type of naves.	C. The submission is a comment that does not include specific proposals. In any event, these cases of existing buildings are contemplated in the articles.
455	THE COMMUNITY OF MADRID FIRE BRIGADE	1.3.5. A sufficient space for manoeuvring a SEIS vehicle to allow the change of direction of the vehicle shall be provided on a non-exit access track of more than 20 m long. This manoeuvring space may consist of a circular area of radius equal to or greater than 9 m, or other similar solutions. (figure)	The graphic examples proposed in the normative text require certain dimensions to be geometrically viable solutions: dimensions of 3.8 and 7 m as seen in the graph below. The omission of these levels might lead to solutions that are not accessible. (proposed figure with more levels)	R. Figure 2.17 is given by way of example, indicating only the relevant dimensions relating to what is defined in the paragraph to which it refers. The rest of the levels are already set in the other paragraphs of the section.
456	THE COMMUNITY OF MADRID FIRE BRIGADE	1.3.6. The provisions of Royal Decree 893/2013, of 15 November, approving the basic planning guideline for civil emergency protection due to forest fires, as well as territorial plans developed in the application of the same and other specific legislation that may exist, will be complied with in areas built adjacent to or within forest areas.	It is deemed important to include this section on adjacent areas, which has been lost with the wording of the RSCIEI project, taking into account the potential risk of an industrial fire. These references are also included in the CTE-DB SI: 'In built areas adjacent to or within forest areas, the following conditions must be met: a. The built or urbanised area should preferably have two alternative access roads, each of which must meet the conditions for approaching buildings (see Part 4, section 1, approach and environment conditions.). b. Where the two alternative routes indicated are not available, the single access must end in a circular cul-de-sac of 12.5 m radius. (Or else, with sufficient space for a SEIS vehicle, to manoeuvre 10 m long by 2.5 m wide.)	R. The new text refers to Royal Decree 893/2013. It is not the purpose of this regulation to have an impact on others' affairs, or on the competences of municipalities relating to urban planning.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			c. Medium and high-risk industrial establishments located near a forest mass must maintain a 30 m wide perimeter strip. permanently free of low and shrub vegetation with clear forest mass and pruned low branches. '	
457	Superior Council of the Colleges of Architects of Spain	RSCIEI. Annex II. S4 2. Accessibility to the façade and interior	All the conditions are specific to this Regulation with the exception of point 2.5 in the case of industries where, due to their specific activity, it is not possible to have accessible façades that fully or partially meet the conditions of section 2.1 and 2.2, where similar solutions must be applied that achieve the same objectives, such as the existence of compartmentalised roads with EI 120 elements and EI2 60-C5 doors that allow access to SIS personnel and have smoke protection through one of the options set out in the CTE DB-SI for the protection of protected stairs and corridors.	C. The submission is a comment that does not include specific proposals.
458	GENERAL COUNCIL OF THE TECHNICAL ARCHITECTURE OF SPAIN, CGATE	Annex II Definitions. The following definitions are laid down: a) Accessible façade. Part 4. Intervention of firefighters 2. Accessibility to the façade and interior	It could have been used to ensure the stability of the façades in the event of fire, especially in the case of those formed by alveolar plates in their different provisions, since various cases of considerably severity of façade panels toppling over have been documented. Simply by considering the possible construction solutions of the plate anchorages to the structure depending on the type of arrangement in question, it would have been sufficient to eliminate the improvisation, and the risk involved, in these anchorages.	R. The general requirements for façades are set out in their corresponding section (Part 2). It is not deemed necessary to add changes or details. Were clarification on specific technological solutions needed, this could be done in the future guide to the regulation.
459	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 4, section 2 2.1 'The façades referred to in paragraph 1.3.1...'	Add *'The façades referred to in section 1.3.1* <u>as well as Annex II, III. Locations not permitted and Table 2.1.1 Note 2</u>...' (and all references that might exist in the regulation)	R. The current text is correct, and aims to talk about the façades of section 1.3.1 and not others. There is no need to make any changes.
460	SFPE Spain	Annex II, Part 4, 2 (d) d) No elements preventing or hindering accessibility to the interior of the building through these gaps should be installed on the façade, except for the safety elements located in the gaps of the floors the evacuation height of which does not exceed 9 m.	definition of safety elements?	C. The current text is sufficiently clear, and the requirement is the same as that applied to non-industrial buildings.
461	Prevention Ser-	Annex II to the RSCIEI, Part 4, section	It is proposed to simplify the wording of this section.	R. The current wording is clearer than

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	vice of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	2.2, third and fourth paragraphs 'In the case of small buildings (less than 500m^2 of occupied floor area) or with low fire load density (low-risk sectors), the characteristics of these and the specific needs for intervention in fire situations should be assessed, and the percentage of accessible façade length may be reduced where appropriate. This particularity must be justified. In the case of particularly large buildings (over 10,000m^2 of occupied floor area), or complex designs (by shape, distribution, etc.), or large areas with very high fire load density (such as high-risk sectors 8 above 2,000m^2), the characteristics of these and the specific needs for intervention in fire situations should be assessed and, if necessary, increase the number of accesses, or the percentage of accessible façade length or other additional measures to achieve the above objective.'	Where it states 'In the case of small buildings (less than 500m^2 of occupied floor area) or with low fire load density (low risk sectors), the characteristics of these should be evaluated' to replace with 'In the case of buildings with a floor area occupied less than 500m^2 and with low risk sectors, the characteristics of these can be evaluated' Where it states 'In the case of particularly large buildings (over 10,000m^2 of occupied floor area), or with complex designs (by form, distribution, etc.), or with large areas with very high fire load density (such as high-risk sectors 8 of surface area greater than 2,000m^2 , or with complex designs (for their shape, distribution, etc.), replace with 'In the case of buildings with a floor area above 10,000m^2, or with complex designs (for their shape, distribution, etc.), or with some high-risk sector level 8 of surface area exceeding 2,000m^2'	the proposal of the submission, by explaining more clearly the objectives pursued in each case.
462	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 4, section 2 2.2. Second paragraph 'The length of the accessible façade should be no less than 15 % of the perimeter of the building floor.'	Clarify In Annex II, III. *Locations not permitted* specific lengths of 5 m, etc. are set, which does not match this article, and so it is advisable to review the location conditions and dimensions	R. They are different sections with different requirements. They are not intended to coincide.
463	FEDAOC	Annex II, Part 5 Fire resistance of the stairs	This paragraph has been amended compared to the Technical Guide to R.D.2267/2004 for In practice, if the steps do not have fire resistance identical to the supporting elements of the ladder, this will be deactivated, meaning it would be advisable to re-include their mandatory protection. In addition, it should be clarified that a ladder serving as an	R. The text is aligned with the CTE and its guidelines. On the other hand, point out that the steps do not have the same characteristics and stresses as the main structure, so their casuistry is different.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			evacuation route must be fire-resistant, regardless of whether the ladder is in the same sector to which it serves or in a different sector.	
464	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 5. Structural strength Table 2.5.1. Page 90 Note 2... is understood as secondary elements to those the collapse of which in the direct action of the fire does not cause damage to the occupants, or compromise the overall stability of the structure, evacuation or compartmentalisation of the fire sectors of the building	Are you asking for this to be proven? Because the structure of a building functions as a whole and, depending on how it is designed, the failure of secondary elements can compromise global stability and compartmentalisation. Clarification is requested on this point.	R. It is not explicitly requested to prove it. The regulation sets clear requirements, and the project executor is responsible for checking that they are met.
465	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 5. Structural strength Table 2.5.1. Page 90. With regard to the fire resistance of the stairs, where the steps of a ladder to which fire resistance is required are elements distinct from the ladder's supports, such resistance is only enforceable to the latter elements, not to the steps	The ladder will no longer be usable if it has no steps. The fire resistance of the table is related to times of stability of the building structure for safety purposes during the intervention, so that firefighters can arrive and establish an attack strategy from the inside (if the fire has been controlled by automatic extinguishing systems), or defensive from the outside (if the fire has been uncontrolled). It makes no sense to require ladders such times, when mezzanines may not justify their fire resistance and other elements of the structure are allowed to reduce stability in certain cases. PROPOSAL: Deleting this paragraph.	R. The text is aligned with the CTE and its guidelines. On the other hand, point out that the steps do not have the same characteristics and stresses as the main structure, so their casuistry is different. For their part, the mezzanines are regulated in Annex IV.
466	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 5, Table 2.5.1 Note 2: 'This table does not apply to secondary elements...'	Specify clearly in the text whether or not to apply to straps	A. Clarifications have been added to the text.
467	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II Table 2.5.2	Review the possibility of reducing the fire resistance of the minor mezzanine structure, which previously existed and now does not	C. Mezzanines are listed in Annex IV. The requirements for each case are already indicated there.
468	CIVIL PROTECTION AND	Annex II Table 2.5.3. 'Type C – Risk under R 30 – Average	Review Table 2.5.3 It is not possible that, according to Table 2.5.2, a type-C light	R. Table 2.5.2 applies to roofs and 2.5.3 to buildings as a whole. Therefore, the

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	risk R 30'	roof, with low risk, is not required to justify resistance and with average risk R 15 is required; but according to Table 2.5.3 to a type-C light roof, with automatic extinction, smoke control, etc., with low and medium risk, R 30 is required	requirements do not need to coincide. Depending on the casuistry, one table, the other, or both can be applied.
469	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex II, Part 5, section 1.3.4 '... **provided evacuation is guaranteed**'.	Delete the sentence. This is obvious	R. It is preferred to keep the phrase for greater clarity.
470	CEPREVEN	Annex II, Part 5, Table 2.5.1 Note 2: This table does not apply to secondary elements, which would not require protection. For these purposes, it is understood as secondary elements to those the collapse of which in the direct action of the fire cannot cause damage to the occupants, or compromise the overall stability of the structure, evacuation or compartmentalisation of the fire sectors of the building	It is suggested to add the following clarification: *Note 2: This table does not apply to secondary elements, which would not require protection. For these purposes, it is understood as secondary elements to those whose collapse in the direct action of the fire cannot cause damage to the occupants, or compromise the overall stability of the structure, evacuation or compartmentalisation of the fire sectors of the building, **such as roof straps**.*	R. It is not deemed necessary to give this example here.
471	Official College of Industrial Engineers of the Valencian Community	Annex II, Part 5: Structural fire resistance. Table 2.5.1. Note 2	Annex II, page 30. The same definition as or reference to CTE DB SI 6.4 should be used for secondary structural elements.	R The current wording of the note is deemed sufficient. It is not deemed necessary to add other references.
472	Official College of Industrial Engineers of the Valencian Community	Annex II, Part 5: Structural fire resistance. Table 2.5.2. Note	Annex II, page 31. 1.- This table, which establishes the fire-resistance requirements of light roofs, should be applied in a similar way to the supports as does the CTE in DB SI 6.3.2, which also requires the same resistance to the supports. 2.- The example of the strap is inadequate, and should be expressed differently. If they are bracing elements. straps are main elements. **It is proposed:** Edit the paragraph of the Note to section	PA. For the roofs, different cases are already contemplated in the different sections. On the other hand, concerning the straps, the text is modified to make it clearer.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			1.1.3 by removing the example of the straps as follows: 'The secondary structural elements of the roof shall not be deemed a constituent part of the main roof structure.' And then adding 'meaning as a secondary element that fulfils the conditions of CTE DB SI 6.4'	
473	Official College of Industrial Engineers of the Valencian Community	Annex II, Part 5: Structural fire resistance.	Annex II, page 31. A section similar to the current regulation 4.2.2 Ground-floor industrial units should be introduced. This is not a particular case, it is quite general.	R It is not deemed necessary to introduce a new section, as this case is covered by the different cases already included.
474	Official College of Industrial Engineers of the Valencian Community	Annex II, Part 5: Structural fire resistance. Table 2.5.3.	Annex II, page 32 **It is proposed:** Restore Table 2.4 of the current regulation. It makes no sense that with sprinklers, more resistance is required than without sprinklers. Moreover, the application of this table over the last 18 years has not had serious consequences justifying its replacement.	R. The new Table 2.5.3 is coordinated to work with Table 2.1.3. In addition, Table 2.5.3 applies to different elements of the structure than 2.5.2, these being different cases. It is understood that the proposed tables are adequate.
475	Official College of Industrial Engineers of the Valencian Community	Annex II, Part 5: Structural fire resistance	Annex II, page 32. **It is proposed:** Adding at the end of Part 5. Structural fire resistance in paragraph 4 of II. Fire-behaviour conditions of construction products and construction elements.	R. The structure of Annex II is correct as it stands. Amending this is not appropriate.
476	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX II. Part 5 Point 1 Table 2.5.1	Type-B buildings, NRI HIGH, have an EI240 requirement. However, the structure that supports the façade is required R120 or less. Does this mean that the resistance demanded of the wall is actually intended to be EI120 on each side, totalling 240 minutes? **It is requested** to clarify whether the transfer of independent structure buildings and enclosures to TYPE C, as proposed, is not taken into consideration.	PA. Type-B cases have been clarified in Part 2, table 2.2.1, note 4. On the other hand, it should be remembered that the outer surface of the building must have a greater or lesser resistance depending on its casuistry (whether it is compartmentalising wall or not, etc.). The requirements of Annex II as a whole are understood to be complete and consistent.
477	ASSOCIATION OF	ANNEX II.	*'Note: In order to be able to apply this table in AH buildings,*	R. It is understood that the current

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Part 5 Point 1.3.2 Table 2.5.3	*the roof structure in question must be independent from the other establishments.'* The application of this table can reduce the safety of the party walls and, therefore, of the damage to nearby establishments. Likewise, it has been found that the values in the table cannot be correct, since it requires the same resistance to buildings type B and C at all risk levels. It is proposed to amend the note: Note: In order to apply this table in buildings Ah, the roof structure considered must be independent from the other establishments. In addition, it must be justified in buildings Ah and B that the localised collapse of the elements with less fire resistance does not damage the façades and mediating areas to which Table 2.2.1 or its note applies. 4. Allow to undertake activities at high risk 8 under those conditions. It is also requested to revise the values in Table 2.5.3.	wording is correct, and does not require changes. It should be recalled that this table is coordinated with Table 2.1.3. Their values are correct. In the case of NRI 8, the matter has already been addressed in other submissions.
478	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Table 2.5.1 MINIMUM FIRE RESISTANCE OF PRINCIPAL STRUCTURAL ELEMENTS WITH LOAD-BEARING FUNCTION Note 2: This table does not apply to secondary elements, which would not require protection. For these purposes, it is understood as secondary elements to those the collapse of which in the direct action of the fire cannot cause damage to the occupants, or compromise the overall stability of the structure, evacuation or compartmentalisation of the fire sectors of the building. With regard to the fire resistance of the stairs, where the steps of a ladder to which fire resistance is required are elements distinct from the	It is unknown whether Note (2) refers to the secondary roof structure (straps), and if so, it is unknown when the straps have to be protected and what value they should have. It is unknown whether this table 2.5.1 has to be used for metal ladders that are escape route. Two such important issues cannot be left at the expense of possible interpretations that might be incorrect.	PA. Change the text on straps to make it clearer. Concerning the stairs, the notes of the table already explain all possible casuistry about the structure.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ladder's supports, such resistance is only enforceable to the latter elements, not to the steps		
479	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Table 2.5.1 MINIMUM FIRE RESISTANCE OF PRINCIPAL STRUCTURAL ELEMENTS WITH LOAD-BEARING FUNCTION	This means that a logistics centre, which has an office of 500 m² – which, by application of Article 4, is an independent fire sector, making it necessary to apply the CTE (to those offices) – forcing it to have an R of 60 minutes for the structure meaning, as the structure is shared, ALL the structure of the logistics centre, which is type C, must have 60 minutes which, when applying Table 2.5.2 (point 1.3) is low risk, does not need protection? Or does it have sprinklers and outlets, this being Medium Risk and applying Table 2.5.2, the values being R15 or R30. Inconsistencies occur again when the Regulation is applied in conjunction with the CTE.	A. Part of a paragraph in subsection 1.2 referring to this matter has been deleted in order to avoid confusion in the interpretation of this aspect, since the text is not intended to say what is inferred from the comment. (This matter is repeated in other submissions).
480	SFPE Spain	ANNEX II Part 5. Structural fire resistance	First, it is proposed to change this title to: 'Part 5. Stability and structural fire resistance'. Previous to point '1. Fire resistance of bearing construction elements' should be introduced to the methods of analysis and include what is set out in point 'II Fire-behaviour conditions of construction products and building elements', namely: 'Alternatively, in order to determine the fire resistance characteristic of structures and elements, the provisions of paragraph 1 'Generalities' and paragraph 6 'Determination of fire resistance' of Part SI 6 of CTE DB-SI and Annexes C to F cited there may also be followed.'	R. The submission only includes comments on form and not on substance, since the proposal being made does not in practice imply any change in requirements compared to what is stated in the current text. In any event, the title of section 5 is correct as it is currently written and it is not appropriate to change it. Similarly, the arrangement of Annex II is also correct and does not require changes.
481	SFPE Spain	ANNEX II S5 1.3 Particular cases for the application of section 1.1 Table 2.5.2. Reference is made to the note below the table. 'Note: This table applies only to the main structure of the light roofs, without considering the pillars or any other support of it. For this purpose, the table is to apply to lintels, trusses or equivalent elements. (Secondary	Roof straps mostly do not contribute to the overall stability of the structural system as a whole. However, there are times when YES contribute to the stability of both roof lintels and the supports themselves and therefore are 'considered a constituent part of the main roof structure'. This situation should be rethought by those drafting the regulation.	A. The note has been changed to clarify this matter.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		structural elements of the roof, such as roof straps, will not be considered a constituent part of the main roof structure).'		
482	SFPE Spain	ANNEX II S5 1.3 Particular cases for the application of section 1.1 Table 2.5.3	A first comment is associated with the definition of light roof. The definition given in point 1.c ANNEX II Definitions c) Light roof: Light roof is understood as defined in Table 3.1 of Section 3.1.1 of the Basic Document 'Structural Safety Building Actions' (DB-SE-EA) of the CTE. Table 3.1, Note 5 of CTE DB AE 5) Light roof means a roof the permanent load of which due solely to its enclosure does not exceed 1 kN/m². Transferring a definition of light roof from the CTE DB SI applied to a building to the draft RSCIEI 2022 does not adapt to a constructive reality in the industry, since the roofing system of a building, such as those regulated by the CTE, does not have to do with the construction systems of enclosures on the roof of industrial buildings. It is therefore proposed to change the definition of light roof to the following: *Any roof the own weight of which is understood as such to the system formed by the weight of the roof straps plus the weight of the enclosure system plus the proper weight of the structural element receiving the straps, regardless of their nature and shape, e.g., a beam type lintel, lattice (either spatial or not) etc., and which in no case exceeds the value of 100 kg/m² will be classified as light.'* Another issue not to be taken into account any less is the consideration of solar panel parks that are increasingly present in the roofs of industrial constructions and buildings within the industry and the consideration as permanent load as fixed facilities. Lastly, it is requested to clarify the technical reasons for applying Table 2.5.3 in a type B and C layout, which in appearance would be a table similar to Table 2.4 of the RSCIEI R.D.2267/2004, although the draft RSCIEI 2022 is by far more restrictive.	R. The definition of light roof is maintained so that it is aligned with the CTE. Concerning the table values, they have been aligned with Table 2.1.3 to be consistent. In general, concerning the changes in the tables compared to the 2004 RSCIEI, it should be noted that these in some cases have been adapted and updated, thus it is normal that they do not coincide with those of 2004.
483	SFPE Spain	Annex II, Part 5, Table 2.5.1 Note 2 This table does not apply to sec-	More complete definition of secondary elements roof straps? How is it justified that it cannot cause damage to the	PA. The text on straps has been changed to clarify this matter. The rest of the text

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ondary elements, which would not require protection. For these purposes, it is understood as secondary elements to those the collapse of which in the direct action of the fire cannot cause damage to the occupants, or compromise the overall stability of the structure, evacuation or compartmentalisation of the fire sectors of the building.	occupants?	of these sections does not require changes because it is sufficiently detailed.
484	SFPE Spain	Annex II, Part 5, Table 2.5.1 Note 2 With regard to the fire resistance of the stairs, where the steps of a ladder to which fire resistance is required are elements distinct from the handlers of the ladder, such resistance is only required of the latter elements, not the steps.	Are stairs with protected supporting structure allowed, but without partition and with independent rung without protection?	C. The submission makes no specific proposals. On the cases that are allowed or not, they are already clear in the text of the regulation and there is no need to elaborate further.
485	SFPE Spain	Annex II, Part 5, 1.3.3 In single-storey industrial establishments constituting a single fire sector, or with administrative areas on more than one plant but compartmentalised from industrial use according to their specific regulations and with an independent structure, located in type-C buildings separated at least 10 m from other establishments as well as limits of plots with the possibility of building on them and free of combustible goods or intermediate elements capable of spreading fire, and protected by a fixed automatic extinguishing system and a system for the control of smoke and heat according to section 8.3 of Annex III, it will not be necessary to justify the fire resistance of	Does it mean that the evacuation is always guaranteed?	C. The current text is sufficiently clear. No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		the structure, provided that evacuation is ensured.		
486	SFPE Spain	Annex II, Part 5, 1.3.4 When, according to Table 2.5.2 or 1.3.3, it is permissible not to justify fire resistance, this particularity must be indicated at the entrances of the building, so that the personnel of the Fire and Rescue Extinction Services are aware of this. of other establishments, as well as limits of plots with the possibility of building on them and free of combustible goods or intermediate elements capable of spreading fire, and protected by a fixed automatic extinguishing system and a system for the control of smoke and heat as referred to in paragraph 8.3 of Annex III, it will not be necessary to justify the fire resistance of the structure, provided that evacuation is ensured.	what should signage look like? number of signs, size, location, etc.	C. It is already stated in the current text that the signage should be indicated and the places where this signage should be placed. It is not necessary to detail further.
487	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 5. Structural strength Section 1.2. Page 91. Regardless of the fire resistance required in Table 2.5.1, for industrial establishments located in buildings of layout type A_V or A_H where industrial and non-industrial establishments coexist, the value required of its structural elements will be no less than that required of the whole building in application of the applicable regulations.	Referring to the fire resistance of the entire building is not very correct in this case, since the requirements of the regulation apply to sectors. It should also be noted that these buildings are shared, and can change their level of risk throughout their lives without forgetting that, for example, in the case of A_H, establishments with low, medium and high risks can coexist and that the maximum area of a sector may also vary (now multiplying by 17 compared to current surface areas). The fundamental issue in these cases is to avoid damage to third parties. PROPOSAL: Amendment of the text so that it reads as follows: 'Regardless of the fire resistance required in Table 2.5.1, for industrial establishments located in buildings of layout type A_V or A_H where industrial and non-industrial establishments coexist, it must be justified that the failure of the structure of a sector does not compromise the stability	PA. Part of the paragraph in subsection 1.2 that concerns this matter has been deleted in order to avoid confusion in the interpretation of this aspect.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			of the rest of the building.'	
488	particular	Annex II RSCIEI, Part 5. Structural fire resistance. Section 1.3.2, in the following text: '1.3.2. In buildings on a single floor and with a light roof, where the total surface area of the fire sector is protected by a fixed automatic extinguishing system and a smoke and heat control system in accordance with section 8.3 of Annex III, the fire resistance of the bearing structures may take the following values: Table 2.5.3	According to the definitions in Annex II, section I, a supporting structure is defined as: 'The structure supporting a building will be understood as consisting of the following elements: forged, beams, supports and main and secondary roof structure.' Therefore, it is not understood that section 1.3.2 requires greater fire resistance in the load-bearing structure (including the main roof structure as defined) for the installation of sprinklers together with a SCTEH, than the one requested in Table 2.5.2 for the main structure of light roofs with a SCTEH in case of medium and high risk sectors. Furthermore, when using the term 'load-bearing structures', as defined herein, the secondary roof structure should also be protected. Second, according to point 1.3 of Annex IV, storage buildings composed of self-supporting metal racks operated by hand, in which there are personnel to be evacuated, which are mostly at high risk, are exempted from justifying their fire resistance simply by the installation of automatic sprinklers or other fixed equivalent automatic extinguishing systems, to the detriment of the provisions of Table 2.5.3 for conventional buildings. On the other hand, the fire resistance of the structures is tested according to the standardised time-temperature curve based on the ISO 834 curve, taking its start to be at the flashover point of the fire (fully developed fire), when the design of a SCTEH and sprinklers is based on not allowing to reach that flashover phase, maintaining low smoke temperatures. Therefore, there is no sense in applying a fire resistance to a structure protected by these two systems together, when this point of fire development is never going to be reached. In view of the above, the following wording is proposed: '1.3.2. In buildings on a single floor and with a light roof, where the total area of the fire sector is protected by a fixed automatic extinguishing system and a smoke and heat control system in accordance with paragraph 8.3 of Annex III, the fire resistance of the main roof structures and their sup-	R. Table 2.5.2 applies to roofs and 2.5.3 (sections 1.3.2) to buildings as a whole. Therefore, the requirements do not need to coincide. According to the casuistry, one table, the other, or both can be applied. Regarding the requirements for shelving in Annex IV, these depend on their specific casuistry, and several possible solutions are given for these. The rest of the matters cited have already been largely assessed in other submissions. It is understood that the text is correct and proportionate, and does not require changes.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			ports may adopt the following values: Table 2.5.3 Intrinsic risk level Type AH Type B Type C Risk under R 60 Not required Not required Average risk R 90 Not required Not required High risk R 120 Not required Not required	
489	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 5. Structural strength **Section 1.3.1. Page 91.** For the main structure of light roofs on floors above ground level, provided that the evacuation of the establishment is ensured and it is justified that its failure cannot cause serious damage to nearby buildings or establishments, and that the stability of other lower floors or the implanted fire sectoring is not compromised and, if its intrinsic risk is medium or high, it has a smoke and heat control system in accordance with section 8.3 of Annex III, the following values may be adopted: Table 2.5.2	This justification can only be made by advanced methods of structural calculation in the event of fire, so it should be made clear so that this is always justified. The reduction in the requirement that this table allows is too significant not to force the justification to be made correctly. On the other hand, it does not seem technically feasible to justify by calculation that the collapse of a floor does not affect the lower ones. If there are no sprinklers, the fire is not going to be controlled, and the smoke control system will not be able to fulfil its task, so it is not justified to reduce the fire resistance of the structure just by having SCTEH. Remember that the structure does not work element by element, everything is connected and the failure of one or a few elements influence global stability. In the case of a concrete structure, if a fault beam leaves the pillar free in the head and can drag it, cause a chain collapse or cause its displacements to drag the compartment or façade to the outside. This occurs, above all, in the case of concrete-panel façades anchored to the outside of pillars (very common today), putting at risk the performance of firefighters and spreading. In case of metal structure, without any calculation, it cannot be known that the failure of a beam does not drag the pillars. On the other hand, does part 4 imply that intervention must be ensured from the inside? /outside? in all cases. It will not be possible to guarantee the intervention without the structure's fire resistance and without checking that there is no ruin of the façade to the outside. PROPOSAL:	R. The text is clear enough and already says what should be justified. The way to justify it is at the discretion of the project executor. For the table, it is not deemed appropriate to delete or replace it with other values as proposed.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			Define the safety objectives correctly, and that the requirements are not contradictory to them. Delete the table, and replace it with: 'For the main structure of light roofs in single-storey buildings above ground level, provided that the evacuation of the establishment is ensured and justified by structural calculation in the event of a fire, that its failure cannot cause damage to nearby buildings or establishments and that the implemented fire sectoring is not compromised and, if its intrinsic risk is medium or high, it has a sprinkler system, the values in Table 2.5.1 may be halved.'	
490	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 5. Structural strength **Section 1.3.2. Page 92.** Table 2.5.3	The application of this table can reduce the safety of the party walls and, therefore, of the damage to nearby establishments. On the other hand, as discussed above, it makes no sense to demand the same from buildings without taking into account their risk or distance to their neighbours. It is proposed to halve the R of Table 2.5.1 in the event there is a sprinkler system. PROPOSAL: Amend the note as follows: 'Note: In order to apply this reduction in buildings A_H, the roof structure considered must be independent from the other establishments. In addition, in A_H and B buildings, it must be justified that the localised collapse of the elements with less fire resistance does not damage the façades and party walls to which Table 2.2.1 or its footnote 4 applies. Under these conditions, high-risk 8 activities are to be permitted.'	R. The application of Table 2.5.3 is conditioned by a number of requirements justifying the values placed therein. On the other hand, the current text of the note is already clear enough. No changes are necessary.
491	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex II, Part 5. Structural strength Section 1.3.3. In single-storey industrial establishments constituting a single fire sector, or with administrative areas on more than one plant but compartmentalised from industrial use according to their specific regulations and with an independent structure, located in type-C buildings separated at least 10 m from other establish-	Since the current classification is by building, and not by establishment, the wording is misleading when there may be more than one building inside an establishment. It is unknown whether all buildings in the establishment must have a floor to apply this section to a specific building. On the other hand, with this paragraph it seems it is encouraged not to sector, since not sectorising implies being able to have a structure with less fire resistance. This goes against firefighters' safety objectives, and damage to their own and third-party property. The question also arises as to whether SCTEH can have any objective.	PA. The text has been slightly nuanced so that it is clearer; however, the wording is not misleading. The applicable requirements are clear in section. Regarding the needs and options for sectorising, these are defined throughout the text. The objectives of the SCTEH are defined in Annex III. There is no contradiction, nor objective to be defined.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ments as well as limits of plots with the possibility of building on them and free of combustible goods or intermediate elements capable of spreading fire, and protected by a fixed automatic extinguishing system and a system for the control of smoke and heat as referred to in paragraph 8.3 of Annex III, it will not be necessary to justify the fire resistance of the structure, provided that evacuation is ensured.	PROPOSAL: Define the safety objectives correctly, and that the requirements are not contradictory to them.	
492	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex II to the RSCIEI, Part 5, section 1.3.1(1). '1.3.1. For the main structure of light roofs not intended for use in the evacuation of occupants, provided that the evacuation of the establishment is ensured and it is justified that its failure cannot cause serious damage to nearby buildings or establishments and that the stability of other lower floors or the implanted fire sectoring is not compromised and, if its intrinsic risk is medium or high, it has a smoke and heat control system as referred to in paragraph 8.3 of Annex III, the following values may be adopted:'	Where it says 'if its intrinsic risk is medium or high', replace with 'if the intrinsic risk of the sector is medium or high'	A. Wording is changed.
493	Efectis France SASU	Annex II, Part 5. Structural strength Section 1.3.2 Table 2.5.3	The application of this table can reduce the safety of the party walls and, therefore, of the damage to nearby establishments. On the other hand, as discussed above, it makes no sense to demand the same from buildings without taking into account their risk or distance to their neighbours. It is proposed to halve the R of Table 2.5.1 in the event there is a sprinkler system. It is proposed to amend the note:	R. The current wording already establishes the conditions for applying this table. No further information needs to be added to the note. Regarding the reference to 'high risk 8', this type of considerations should not go in this section, since they have another section where this takes place (locations not permitted).

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			Note: In order to apply this reduction in Ah buildings, the roof structure considered must be independent from the other establishments. In addition, in Ah and B buildings, it must be justified that the localised collapse of the elements with less fire resistance does not damage the façades and party walls to which Table 2.2.1 or its footnote 4 applies. Under these conditions, high-risk 8 activities will be allowed to take place.	
494	Professional Association of Fire Technicians (APTB)	Annex II Part 5. Structural fire resistance 1.3.4. When, according to Table 2.5.2 or 1.3.3, it is permissible not to justify fire resistance, this particularity must be indicated at the entrances of the building, so that the personnel of the Fire and Rescue Extinction Services are aware of this.	This signal should be standardised at the entrances to the building (size, colours, typography, material, etc.)	R. The main requirements to be met in order to signal this situation are sufficiently detailed in the text. Note that there are already UNE standards on how to design signals that can be used for this, although it has been chosen not to mention them explicitly.
495	FEDAOC	Annex 3	It would be advisable to clarify that in areas of zero occupation, it is not necessary to comply with the requirements for active protection or the maximum distances of evacuation routes. In this paragraph of Annex III, an alternative wording might be: *[...and in any other regulations applicable to them, except in areas classified as having zero occupation].* In this paragraph, an alternative wording might be: *[...for each of the sectors, except in the areas classified as having zero occupation, deduced from the following expressions].*	R. In areas of zero occupation, the requirements are the same as in other areas, unless otherwise stated at some specific point.
496	FEDAOC	Annex 3	It would be advisable to clarify that the active protection envelope cannot be shared across sectors, as indicated in the CTE. One possible solution would be to include this clarification in the following paragraph of Article 8: 'the facilities for active protection facilities to be provided for by establishments will be those laid down in Annex III...'. Ending up as follows: *[...in accordance with the characterisation resulting from the previous article, the active protection envelope for manual use of one sector cannot be considered to cover part of*	R. The current text is sufficiently clear, and there is no need for further clarification. The wording of the current regulation and the RIPCI leaves no doubt as to how the requirements should be applied.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			the area of another sector].	
497	Superior Council of the Colleges of Architects of Spain	ANNEX III. ENDOWMENT REQUIREMENTS FOR ACTIVE FIRE PROTECTION facilities IN INDUSTRIAL ESTABLISHMENTS.	In all facilities relating to fixed extinguishing systems, it would be appropriate to include specifications on their design as to their location in the establishment being designed, depending on the level of intrinsic risk, type of establishment, surface area, height and inclination of the roof, indicating, minimum number and distances and being able to be accompanied by explanatory graphs. If this regulation does not apply, it is proposed to include it in the amendments provided in the Fifth Final Provision for amendments to the Regulation on fire protection facilities, approved by Royal Decree 513/2017, of 22 May. This way, all aspects relating to the design of the establishment could be established without having to resort to limited access rules.	R. Everything related to the design of FP facilities is already included in the current RIPCI. There is no need for further regulation on this issue.
498	particular	I. Definitions. 1.Fire detection and alarm systems Section 1.4: '1.4. The systems referred to in sections 1.2 and 1.3 must have their corresponding alarm devices. In addition, in cases where the total constructed area of all fire sectors of the industrial establishment is 10,000m² or more, alarm communication systems will be installed to enable the transmission of local alarms, general alarms and verbal instructions by voice alarm system throughout the industrial establishment.'	Recommendation: Alarm communication systems will be installed to enable the transmission of local alarms, general alarms or verbal instructions by voice alarm system throughout the industrial establishment. EXPLANATION: In industrial enclosures, it is very common high noise levels where the support of 'visual' alarm systems is mandatory. In case operators wear hearing protections, the 'intelligibility' of the word will be impossible to guarantee.	R. Requirements must be adapted to the needs of each individual case, which are not always the same. It would be disproportionate to always demand the utmost, when it might not be necessary in many cases.
499	Subdirectorate-General for Industry, Government of Valencia	ANNEX III – ACTIVE PROTECTION FACILITIES I. Definitions	The definition of constructed surface area appears to be missing. It is not clear, and has been the subject of many queries, whether the constructed surface area should be deemed a total area, for example that which appears in the cadastral reference of the building, or whether the value of useful surface area, discounting the surface of walls, stairs, etc.	R. The term constructed surface area is a widely used and accepted term. On the contrary, the useful surface area is not the same as the constructed surface area. When the text refers to constructed surface area, it is not intended to refer to the useful one.
500	European Fire Sprinkler Net-	Annex III (in multiple) Note: Where there are both manu-	To require the installation of active protection measures, we rely on the definition of the risk of the establishment ac-	PA. The classification of the sectors is provided for in Annex I, and is suffi-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	work	facturing and permanent storage activities in a sector (without considering as such the 'day store'), the installation of these systems will be necessary where the sum of the ratios between the surface area intended for manufacture and that intended for storage, between the area from which the installation is mandatory in each case, is equal to or greater than 1, as follows: [(Manufacturing surface are/surface area from which installation is mandatory for manufacturing) + (Storage surface area/surface area from which the storage facility is mandatory)] ≥ 1, and must be the sum of both areas equal to the area of the sector.	cording to its typology. The challenge is in low-risk establishments that might contain a high-risk storage area. For example in a metal processing and repair plant of 8,000m^2; with a storage area for parts and components of 2,000m^2 in 6 m racks is a low risk. However, if those same 2,000m^2 storage were outside this establishment as an independent establishment, it would be an average risk and would be within the limits of being protected with fixed automatic extinguishing systems. The risk is not reduced by the combination of the two and should be considered separately. Otherwise, there might be a significant risk in a large establishment without proper consideration of the fire load. Proposal for amendment: Annex III 7. Fixed automatic-extinguishing systems. 7.1.1 Note: Where there are both manufacturing and storage activities in a sector, the installation of such systems will be necessary where the sum of the ratios between the surface area intended for manufacture and that intended for storage, between the surface area from which the installation is mandatory considering the risk of each case separately, is equal to or greater than 1, as follows: [(Manufacturing surface area/surface area from which installation is mandatory for manufacturing risk) + (Storage surface area/surface area from which installation is mandatory for storage risk)] ≥ 1, and must be the sum of both areas equal to the area of the sector	ciently detailed with the current wording. In the Annex, a more generic classification (e.g. buildings or establishments as a whole) or a more detailed classification (e.g. sub-areas) could have been chosen; however, the classification proposed by sector has been deemed the most appropriate. Nevertheless, for large low-risk areas with uneven fire loads, a new section 7.1.2 has been added to Annex III, which explicitly sets out their case studies.
501	Official College of	Annex III, point 1.1	Annex III, page 1.	R. The current text is correct. The cur-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	Industrial Engineers of the Valencian Community		Automatic detection systems do not always generate an automatic alarm. In many cases, the detection is automatic, although a recognition of it by some intermediate system, such as a security officer, is required to activate the alarm. For this reason, where it says: '1.1. Fire detection and alarm systems will consist of devices for automatic activation (detectors) or devices for manual activation (manual alarm buttons),...' **It is proposed:** '1.1. Fire detection and alarm systems will consist of devices for automatic detection (detectors) or devices for manual activation (manual alarm buttons) or automatic alarms.'	rent wording clearly states when push-buttons should be installed, when detectors and when both should be installed. When talking about manual activation it refers to push-buttons, and when talking about automatic it refers to detectors. Normally, when detectors are installed there are also push buttons (see section 1.2). Regarding the alarm devices to be installed, these are also defined in this section. Therefore, this section, together with the corresponding section of the RIPCI, deals with the issue in full.
502	FEDAOC	Annex III (several points)	When in an establishment it is necessary to assess whether an automatic detection system or sprinklers or outlets is to be put in place, Annex III, points 1, 7 and 8, distinguishes us between manufacturing activities and storage activities, and the way to differentiate them is: 'the installation of such systems will be necessary where the sum of the ratios between the area intended for manufacture and that intended for storage between the surface from which the installation is mandatory in each case is equal to or greater than 1, as follows...' When referring to the area intended for storage, it is unknown whether the passageway area would enter and how this area is demarcated, i.e. this warehouse would be considering what the new document mentions in Note (1) or Note (2) to Table 1.5, which distinguishes the different storages that can be held: Note (1): When using the value of qv of 'gross storage', the Si surface area to be applied must correspond to the surface of the warehouse, including the space where the stored products are physically (shelving, etc.) and also include the adjacent aisles necessary for the performance of the storage activity. Note (2): When using the value of qv of 'net storage', the Si surface area to be applied must correspond to the area	R. In particular cases where there is a blend of manufacturing and storage, it is up to the project executor to determine which areas correspond to each one (with their corresponding passageways). The current text is sufficiently clear. No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			strictly occupied by the stored products (shelving, etc.) not including the adjacent aisles necessary for the performance of the storage activity. The calculation by gross storage may give rise to arbitrariness in demarcating the storage area; it is more consistent to use the net storage value. Suggestion: indicate that the storage area will be deemed net storage for the purposes of area calculation.	
503	Professional Association of Fire Technicians (APTB)	Annex III Fire detection and alarm systems 1.3. Where the aforementioned systems are not required in accordance with section 1.2, detection and alarm systems with at least devices for manual activation (hand-held pushers) will be installed in fire sectors having a constructed surface area of 400 m^2 or greater.	In our opinion, no priority should be given to manual push.buttons over automatic detectors. Applying the provisions of points 1 and 1.3. of the draft RSCIEI, all industrial low-risk storage or production activities would not be required to automatically detect fires, and this does not make much sense for the following reasons: – Many activities are unattended during nights and weekends. – Remote monitoring of alarm signals is an increasingly normal occurrence in fire detection. – Information management is a critical factor for security and key to productivity. Fire detection switchboards are increasingly connected to control centres that are permanently operated by qualified operators, where the alarm transmission is done in the shortest possible time. – The rapid progression of a fire from its incipient phase to the point where its control becomes unfeasible is directly related to the time it takes to initiate actions for its extinction. – At present, there are already regulations for unattended sites (robot parking, service stations, etc.), where fire protection systems are not supervised, which are required to connect such systems to an alarm reception centre. – There is a standard, UNE EN 50518 'Centres for monitoring and receiving alarms' that in the 2019 edition has extended its scope to fire detection alarms. – The economic difference between the installation of an automatic detection system and a manual push-button sys-	PA. The text of subsection 1.2 has been amended to allow detectors to be installed in low-risk sectors from a given surface, depending on the specific case. This change reflects part of the request this submission makes, although the wording is not the same as the one proposed by it. In any event, it should be noted that the regulation proposes minimum allocations depending on different factors (layout, area, use and level of risk). The requirements stated are intended to be proportionate. Concerning when to install push-buttons, detectors or both, minimum limits have been set that have been understood proportionate. The same applies to other systems in the other sections of Annex III, such as automatic extinguishing systems, which operate independently of detectors.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			tem is minimal, since what has a higher cost is the control and indication equipment that must be installed in both cases. The real cost to the plant's would be to lose everything due to the extinction tasks starting late, not detecting the start of the fire in time, finding a very developed fire that prevents the action of the extinction services to save the goods. Article 1 'Subject matter' of the draft Regulation states the following: Article 1. Object *The purpose of this regulation is to lay down the requirements to be met by industrial establishments as regards their safety in the event of fires, to prevent the occurrence of fires and to provide an adequate response in the event of occurrence,* ***by establishing measures to facilitate their rapid detection, to limit their spread and to enable their extinction, with the aim of minimising the risk of damage to people, property and the environment.*** When reading points 1 and 1.3 of Annex III, it is noticed that this object is not fulfilled at all, because the fire will not be detected quickly, because the owner could lose all his property if it is not intervened in time and if the whole industry was burned it would do much more damage to the environment for the longer time that would require extinction. Since the draft of the new Regulation provides for the installation of manual alarm buttons in those sectors that have an area of 400 m^2 or higher, and monitoring and indication equipment is needed for those for those facilities, making the facility more expensive, instead of installing manual activation devices, automatic activation devices could be installed that will guarantee the immediate alarm at any time when no one is present in the sector, without the change there is a significant price difference, and greatly improving the effectiveness of the installation. For this reason, it is proposed to state the need for automatic detectors rather than manual push-buttons with the following amended text:	

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			Annex III - Fire detection and alarm systems ***Where the aforementioned systems are not required according to section 1.2, automatic activation and alarm detection systems will be installed in fire sectors with a constructed surface area of 400 m² or greater.***	
504	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX III. Point 1.4.	'1.4. The systems referred to in sections 1.2 and 1.3 must have their corresponding alarm devices. In addition, in cases where the sum of the constructed area of all fire sectors of the industrial establishment is 10,000m² or greater, alarm communication systems that allow the transmission of local alarms, general alarm and verbal instructions by voice alarm system will be installed throughout the industrial establishment.' In turn, the fifth additional provision of the RD project amends RD513/2017 to read: 'The design, installation and commissioning of voice alarm systems will be in accordance with standard **UNE 23007-32**'. If we go to this standard UNE23007-32, we find that the prescriptive design of these voice alarm systems (VAS) obliges installing a sirens-speaker with a radius of coverage of 6 m (28.3 m²), or separations of 12 m in corridors. In 10,000m² of industrial unit, there would be 353 sirens-speaker located on the shelving pillars (less than 5m from the ground) and connected by security cables. Practically one siren-speaker every two pillars of shelving. Departing from these prescriptions leads us back to legalisation by means of equivalent security techniques, in a section that until now was surely unpublished, such as the fire alarm. In the logistics sector, as in any work environment in Spain, before entry into the workplace and thereafter, 100 % of staff receive continuous training in the preventing occupational risks, including the evacuation of establishments. On the other hand, the occupancy of logistics warehouses can vary greatly, depending on whether an automatic activity is carried out, a movement activity by trucks, or a picking	PA. The paragraph has been amended so that these systems are required only for more specific cases, and the requirement is more proportionate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			in a mezzanine, for example. In view of the above, **it is proposed that** complete the wording of point 1.4 as follows: *'1.4. The systems referred to in sections 1.2 and 1.3 must have their corresponding alarm devices. In addition, in cases where the sum of the constructed area of all fire sectors of the industrial establishment is 10,000m² or greater,* ***and the occupancy density of the sector is greater than one person/100 m², it is recommended to install alarm communication systems that allow the transmission of local alarms, general alarm and verbal instructions by voice alarm system, throughout the industrial establishment'***.	
505	KREAN S.COOP	Annex III Part 1 point 1.4	Delete the part referring to verbal instructions using voice alarm systems in the sentence: *'1.4. The systems referred to in sections 1.2 and 1.3 must have their corresponding alarm devices. In addition, in cases where the total constructed area of all fire sectors of the industrial establishment is 10,000m² or more, alarm communication systems will be installed to enable the transmission of local alarms, general alarms and verbal instructions by voice alarm system throughout the industrial establishment.'* This system in an industrial warehouse and or storage where the ratio of people per m^2 is very small, where the working people are familiar with their environment, it only makes the installation more expensive without achieving a real purpose or an aid to evacuation.	PA. The paragraph has been amended so that these systems are required only for more specific cases, and the requirement is more proportionate.
506	SFPE Spain	Annex III, 1 Fire detection and alarm systems, point 1.4 In addition, in cases where the sum of the constructed area of all fire sectors of the industrial establishment is 10,000m² or more, alarm communication systems will be installed to allow the transmission of local alarms, general alarm and verbal instructions by means of voice alarm system,	In the case of establishments with different buildings, separated by long distances and with entirely independent activities, is it mandatory to install a voice alarm system in all buildings? Is it mandatory to install a voice alarm system in the fire areas?	A. More detail has been added to make this case more visible in the text.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		throughout the industrial establishment.		
507	FACEL	Page 93, Annex III, Chapter 1, *'1. Fire detection and alarm systems.'*	Proposal: Insert a new section 1.5. with the following text: 1.5 The cables to be used in the installation of the detection and alarm systems must comply with Annex II 4.2. Justification: The RIPCI does not provide any extra information. We understand that this type of installation must remain in operation for a certain time in the event of fire, so it should be explicit that the facilities must comply with those of Annex II 4.2.	R. Minimum envelopes should be fixed in Annex III to the RSCIEI. Requirements for FP facilities and products should be laid down in European product legislation, or in the absence thereof, in the RIPCI. Moreover, Annex II to the RSCIEI sets out a number of general requirements for cables.
508	CEPREVEN	Annex III, section 1	In order to avoid the deployment of detection equipment not explicitly covered by the applicable regulations (RSCIEI/ RIPCI) without the corresponding validation, it is suggested, as with the rest of the active fire protection system, to add a heading 1.5 indicating: '1.5 The detection and alarm systems installed in accordance with sections 1.2 and 1.3 above will comply with the provisions of the RIPCI.'	R. It is already generally stated at the outset that everything that is installed in Annex III must comply with the RIPCI.
509	FEDAOC	Annex III, point 2, Fire-water supply systems	In the 2004 RD, there is a summary table that reduces flows and reserve, when in an installation several extinction systems coexist. There are cases in which, with RD 2267/2004, the total flow rates did not have to be added, and with this table they did. In the case of extensions/alterations (e.g. when adding a new industrial unit to a logistics establishment), the entire water supply system will have to be recalculated, which may mean that the water reserve or pumping group is no longer insufficient, although it is with Royal Decree 2267/2004. Suggestion: place the current table for extensions of existing establishments.	PA. The new text includes a new clearer methodology differentiating on a case-by-case basis. For older buildings, the articles already contemplate the steps to follow in the event that reforms have to be made. In addition, several cases of frequent simultaneity have been added to the text of this paragraph, in response to the submissions received.
510	Subdirectorate-General for Industry, Government of Valencia	ANNEX III – ACTIVE PROTECTION FACILITIES 2. Fire-water supply systems. 2.3 c) In the event that several industrial establishments share the same supply	It should indicate how the water reserve calculation is carried out in these cases, if the RD is not the appropriate place, to be taken into account in the development of the technical guide of the *Final third provision. Application measures.*	R. The current text already establishes what is the necessary reserve when determining what are the conditions of flow and time required.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		system for their fire protection systems, it must comply with the provisions of the previous paragraphs, and also be designed for the case of more demanding demand, being able to consider alternative and exclusionary fire scenarios. In addition, its correct maintenance and accessibility must be guaranteed at all times by the owners of the different establishments sharing it.		
511	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex III to the RSCIEI, section 2.3 (b) 'b) For the calculation of the flow, pressure and water reserve of water, it is not mandatory to provide for the coincidence of more than one fire source in the establishment, since the protection systems are designed to control and extinguish a fire in a single location and that it does not expand to other areas.'	Because not all active protection systems are designed to control and extinguish a fire (the function of detection, for example, is to give the alarm signal) and taking into account that passive protection elements are also prescribed, the following alternative wording is proposed: 'b) For calculating the flow, pressure and water reserve, it is not mandatory to provide for the coincidence of more than one fire source in the establishment, since active and passive fire protection measures are designed, inter alia, to limit the risk of spreading the fire to other areas.'	R. The current text is correct and clear enough. Adding more considerations to this paragraph would not make them more understandable, but would make it difficult. In addition, it is obvious that certain systems such as fire detectors do not need water to operate (and therefore this section does not apply to them) and that their function is another one than the one you put here, so there is no need to clarify it.
512	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex III to the RSCIEI, section 2.3 (c) 'c) Where there are several areas to be protected with several protection systems in each, it is generally sufficient to calculate the flow, pressure and reserve to satisfy the systems of the area with the most demanding demand, understanding that, in this way, this calculation will be sufficient to operate the protection systems each of the areas to be protected, against a fire in those areas.'	A 'de' is missing. Where it says 'los sistemas de protección cada una de las zonas a proteger', replace with 'los sistemas de protección de cada una de las zonas a proteger'	A. Typo has been corrected.
513	Official College of Industrial Engineers of the Valencian Commu-	Annex III, point 2.3.e	Annex III, page 4. It does not specify, leaving it to the project executor to consider different alternative or exclusionary scenarios without defined criteria.	R. Paragraph 2.3.e should be read alongside the other paragraphs above, where this matter is clear. What is indicated for point (e) is a very specific case.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	nity			
514	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX III. Point 2.3 (a)	'The flow, pressure and water reserve must be sufficient for all protection systems to operate simultaneously in the event of a localised fire. This implies that, in the event of protection systems co-existing and needing to operate at the same time to act on a fire in a single location, it must be calculated so that those systems can operate simultaneously. For example, if in the same sector there are sprinklers and firefighting fixtures to protect that place, the supply system (flow, pressure and water reserve) must be calculated so that both operate simultaneously. At present, all existing water supply systems (private and public) have been calculated for a water pressure, flow and reserve according to the current RD2267/2004, which included a simultaneity between the different services. In the case of logistics department stores, the calculation flow was marked by 100 % of the flow of sprinklers, plus 50 % of the flow of hydrants. This consideration alone already leaves the compliance range of the new RSCIEI out of compliance with most of today's existing pressure groups and tanks. In addition, with High NRI 8 (most establishments as revealed thus far), the flow of hydrants should be calculated with 2 000 l/min and 3 units in operation. The same for the flow rate of BIES (three firefighting fixtures of 45 working simultaneously) and autonomy of 90 minutes. Under the current wording, any establishment that is renovated, extended or varies its fire load must justify its supply in accordance with this new criterion and, therefore, will not be able to comply. IT IS PROPOSED: that the requirement of simultaneous flow rates be taken into account in new buildings exclusively or new polygons, in the case of Community supply networks. Or else, reconsider the water flows and reserves of the current RSCIEI RD 2267/2004.	PA. The new text includes a new clearer methodology differentiating on a case-by-case basis. For older buildings, the articles already contemplate the steps to follow in the event that reforms have to be made. It should also be noted that the new text does not call for the simultaneous provision of three hydrants and three firefighting fixtures, and that the corresponding sections have been restructured and updated. On the other hand, on the comment of NRI 8, this issue has already been addressed in previous submissions. In addition, several cases of frequent simultaneity have been added to the text of this paragraph, in response to the submissions received.
515	APICI	Annex III, Part 2. Fire-water supply systems. Section a.	Section 'a) The flow, pressure and reserve will be sufficient for ALL protection systems to operate simultaneously in the event of a localised fire' as it does not establish which systems should act simultaneously. It is proposed to add the following additional example to the	PA. The proposal for an example appeared to contradict the initial paragraph, meaning it need not be used as an example of that paragraph.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			one already included: For example, if in the same sector there are sprinklers and firefighting fixtures to protect that place, the supply system must be calculated so that both operate simultaneously. Or if in the same sector there are sprinklers, firefighting fixtures and hydrants, the supply system will be sufficient to be calculated to operate simultaneously the sprinkler system and the hydrant system, excluding that of firefighting fixtures.	On the subject of studying the different simultaneities, several cases of frequent simultaneity have been added to the text of this paragraph, in response to the submissions received.
516	APICI	Annex III, Part 2. Fire-water supply systems. Section c.	It is indicated that it is sufficient to calculate the system of the area with the most demanding requirement, however, to reach this conclusion, the rest of the systems in the area have been calculated, unless the critical system is clearly one or the rest of the systems are very similar. It is proposed to specify the paragraph as follows: C - When there are several areas to be protected with several protection systems in each, ~~in general~~ it is sufficient to calculate the flow, pressure and reserve to satisfy the systems in the area with the most demanding demand, understanding that in this way, this calculation will be sufficient for the protection systems of each of the areas to be protected, against a fire in these areas, to work, provided that it is justified that the calculated scenario is clearly the critical among the existing ones or similar to the other existing systems (meaning 'similar' systems with the same design criterion, in other areas, in which case it will be worth calculating the most hydraulically unfavourable scenario when it is feasible to justify it without requiring additional calculations).	R. The current text is correct and clear enough. The proposal made in the comment does not improve the current wording, but makes it more complex.
517	KREAN S.COOP	Annex III Part 2 Fire-water supply	The considerations of simultaneity in the various active protection systems have been eliminated, thus increasing the required water reserves and pressure groups. These simultaneities are taken into account in other prestigious regulations, such as NFPA or FM, since in the event of fire not all systems work simultaneously. Study.	A. Several cases of frequent simultaneity have been added to the text of this section, in response to the submissions received.
518	SFPE Spain	Annex III, 2.3 a) the flow, pressure and water reserve must be sufficient for all protection systems to operate simulta-	In the case of sectors with hydrants, sprinklers and firefighting fixtures, should the simultaneous flow rate of hydrants be considered according to Table 3.3.3, firefighting fixtures according to RIPCI and sprinklers according to UNE 12.845?	A. Several cases of frequent simultaneity have been added to the text of this section, in response to the submissions received.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		neously in the event of a localised fire.		
519	FACEL	Page 95, Annex III, Chapter 2, *'2. Fire water supply systems'*.	Proposal: Insert a new section 2.4. with the following text: 2.4 The cables to be used in installing fire-water supply systems must comply with Annex II 4.2. Justification: The RIPCI does not provide any extra information. We understand that this type of installation must remain in operation for a certain time in the event of fire, so it should be explicit that the facilities must comply with those of Annex II 4.2.	R. Minimum envelopes should be fixed in Annex III to the RSCIEI. Requirements for FP facilities and products should be laid down in European product legislation, or in the absence thereof, in the RIPCI. Moreover, Annex II to the RSCIEI already set a number of general requirements for cables, which general rules lay down. There is no need to repeat this here.
520	THE COMMUNITY OF MADRID FIRE BRIGADE	Annex III **3. Fire-hydrant systems**	Annex III 3. Fire-hydrant systems The section on 'Fire hydrant systems' in Annex III has many changes compared to the current RSCIEI. With the introduction of the concept of 'hydrant for truck filling', the requirements for 'direct impulsion hydrants' system in establishments type A (v and h) and B are reduced and tightened for Types D and E. The justification for this is that in Types A and B there are other FP measures. Example: – A industrial unit of type A_H of 599m^2 with medium risk will not have any type of hydrant and can operate with a truck filling hydrant on public roads up to 3,499 m^2, only from 3,500 m^2 would be forced to direct impulsion hydrant. Interestingly, this type of installation A_H only requires sprinkler system from 1,500 m^2, and not 500 m^2, as currently required in production activities. – A type B industrial unit of 3,499m^2, with an average risk, will only have one hydrant for truck filling, which can be the one located on the public road at 100m. For this type B installation, only from 2,500 m^2, a sprinkler system will be required in production activities.	C. The proposed new text has increased the level of detail on the provision requirements for these systems compared to what was established in the previous regulations of 2004. The new requirements are intended to be more proportionate to the features of the site. No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
521	European Fire Sprinkler Network	Annex III Table 3.3.1. HYDRANTS FOR TRUCK FILLING DEPENDING ON THE LAYOUT, SURFACE AREA AND LEVEL OF INTRINSIC RISK OF SECTORS OR FIRE AREAS	This is incongruous since at low risk Type D is necessary from 5,000m²; however, we could have the same or greater load of fire within this type of establishments. Proposal for amendment: Correct the table to show the need for hydrant above 5,000m² in Low Risk.	A. The current wording already considers below this table, in point 3.2.2, that from 5,000m² always install hydrant of this type. In any event, the wording of the table is clarified by adding new rows that will avoid confusion in its reading.
522	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex III, Table 3.3.1 Note 1: 'Not necessary when the risk is low 1'	Also make Note 1 applicable **layout D**	R. It does not apply because for type D, in the table it is requested from 5,000m², and in the next paragraph it says that in all cases when the surface area is greater than 5,000m², it is always necessary to have hydrant. Therefore, even if that note was placed for type D, they should continue to have hydrants anyway because of the following paragraph.
523	THE COMMUNITY OF MADRID FIRE BRIGADE	Annex III Table 3.3.1. HYDRANTS FOR TRUCK FILLING DEPENDING ON THE LAYOUT, SURFACE AREA AND LEVEL OF INTRINSIC RISK OF SECTORS OR FIRE AREAS Note to the table 3.2.2. In any event, at least one hydrant will be installed for truck filling **if the total area of the industrial establishment (including the area built in buildings and that of the open spaces) is equal to or greater than 5,000m².**	Annex III Table 3.3.1 Regarding the note to Table 3.2.2: It seems that it concerns only one owner, since only the total area of the industrial establishment is mentioned. Would the grouping of industries type Ah, which individually do not require hydrant, but in sum exceed 5,000 m²c, therefore be excluded? If we consider, for example, a cluster of buildings A_H, in order to minimise the risk of fire, it should indicate 'establishment or grouping of establishments'	R. The regulations govern only individual establishments. Industrial estates as a whole fall outside the scope of the regulation, and there would be no simple way to require in this annex an isolated owner a requirement that extends beyond his proposed establishment.
524	THE COMMUNITY OF MADRID FIRE BRIGADE	Annex III Table 3.3.1. HYDRANTS FOR TRUCK FILLING DEPENDING ON THE LAYOUT, SURFACE AREA AND LEVEL OF INTRINSIC RISK OF SECTORS OR FIRE	Annex III Table 3.3.1 Hydrant-network system: Proposal: AH ≥ 300 NO YES YES ≥ 1,000 YES (1) YES YES It is proposed to equate the surface area limits for truck fill-	R. The requirement for Av establishments is different from Ah because the risk is estimated to be higher. It is therefore believed that different limits should be maintained.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		AREAS Hydrant-network system AH ≥ 600 NO YES YES ≥ 1,000 YES (1) YES YES	ing to the Av and AH type all of this, in particular with regard to the gravity that a fire of an industrial nature and in line with the previous section can entail.	
525	THE COMMUNITY OF MADRID FIRE BRIGADE	Annex III 3.2 hydrants for trucks The main role of these hydrants is the filling of the tankers of the Fire and Rescue Extinction Services. When hydrants of this type are required, they must be located outside the building or open space to be protected, less than 100 m from the main entrances or accessible façades of the aforementioned buildings and areas, so that their accessibility to the Fire Extinction and Rescue Services is allowed.	Due to the huge potential of an industrial fire, RSCIEI is deemed to be more demanding in hydrant network sites, especially in higher risk layouts, A and B, even when it comes to hydrants for truck filling. For this reason, the distance envisaged by analogy with a fire from the scope of the CTE is deemed insufficient for an industrial fire and therefore suggests the following: If the mandatory systems cannot be increased, at least the proximity of the hydrant to the industry could be increased, reducing that distance from 100m to 40m. This proposal would be a way to strengthen the hydrant network, at least in a newly created industrial estate, which could not only rely on municipal hydrants, but also with hydrants from the industrial estate, which might be able to source from a centralised water supply system, without penalising particular the plant.	R. That the distance between the hydrants located on public roads is greater or lesser will not affect the flow, pressure or reserve of these, so in practice the requested change will only affect that the truck has to travel more or less metres, which should not be an impediment. Given that in the CTE DB-SI, the distance currently considered is 100m to this type of hydrants, including different distances for the cases of industries would hinder their application, as well as urban planning.
526	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex III to the RSCIEI, section 3.2.4(b) 'b) The minimum required pressure of the hydrant will be 100 kPa (1 kg/cm^2) at the outlet mouth. The minimum flow rate will be 500 l/min and the autonomy time will be at least 60 minutes. (Note: The indicated flow rate and range time correspond to the total to be supplied to the hydrant network, regardless of the number of hydrants installed). Such hydrants installed may be connected to the public water supply network, without the need for a tank or pump-	The minimum flow rate of 500 l/min is deemed insufficient to be able to perform the intervention by the Fire and Rescue Extinction Services in the event of fire in an industrial establishment. It is proposed to increase the requirement to a minimum of 1,000 l/min. Where 'The minimum flow rate will be 500 l/min' replace with 'The minimum flow rate will be 1,000 l/min'	R. The flow rate for this type of hydrants is the one currently included in the RIPCI in its Annex I. In any event, it is a minimum flow rate, being able to the municipalities in the public hydrants of their municipality to put a higher value.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ing equipment, when it is capable of providing the required pressure and flow.'		
527	European Fire Sprinkler Network	Annex III 3. Hydrants for truck filling Table 3.3.2. HYDRANTS FOR TRUCK FILLING DEPENDING ON THE LAYOUT, SURFACE AREA AND LEVEL OF INTRINSIC RISK OF SECTORS OR FIRE AREAS	in the scenario of an establishment of 12,000m^2 Type C, Low Risk 2 Only one hydrant will withstand the filling the fire engine with a flow rate of 500l/min. The defence of the establishment is based on this provision and the water available in the truck. If we take into account similar situations, these buildings could contain a significant warehouse but would be deemed low risk 2. This level of water supply for the intervention of firefighters proves to be insufficient. Proposal for amendment: *Correct the table to show the need for that hydrant from 5,000m^2 and Low Risk with a note that you specify applies to Low Risk 2 only.*	R. Regarding Table 3.3.2, this covers direct-drive hydrants (not exchange fillers, which are in Table 3.3.1). It is understood that due to their characteristics and distribution, direct-pumping hydrants hydrants should not be mandatory for low-risk sectors. With regard to truck filling hydrants (Table 3.3.1), in such cases this type of hydrants is requested.
528	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex III, Table 3.3.2 Note 1: 'In case there are several adjacent areas, the joint surface of **all of them must be calculated, and those that are de low risk can be excluded from the sum**.'	Amend *Note 1: 'If there are several adjacent areas, the joint* **surface of all areas of medium or high risk should be calculated.** (Given that Note 1 clarifies Table 3.3.2 showing only medium and high risks)	R. There are no significant changes between the two possible newsrooms.
529	CEPREVEN	Annex III, section 3.3.2 3.3.2. The main function of these hydrants is directly pumping water to the areas to be protected by means of hoses or lances, can also be used for the filling of trucks of the Fire Extinction and Rescue Services. When according to the table above, a sector or area requires such a system of hydrants, these must be located in the outer perimeter of the buildings and open spaces, the installation must protect the perimeter of all buildings of the industrial establishment, as well as all fire areas. How-	It is suggested to incorporate the following correction/clarification: 3.3.2. The main function of these hydrants is directly pumping water to the areas to be protected by means of hoses or lances, can also be used for the filling of trucks of the Fire Extinction and Rescue Services. *When according to the table above, a sector or area requires such a system of hydrants, these must be located in the outer perimeter of the buildings and open spaces, the installation must protect the perimeter of all buildings of the industrial establishment, as well as all fire areas. However, in the event that the industrial establishment consists of several separate buildings or open spaces, separated ~~among them~~* ***from the sector or fire area that according to Table 3.3.2. requires the installation of hydrants****, more than 10 m*	R. The initial wording is more precise. The aim is to allow separate consideration of buildings at a distance from each other.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ever, in the event that the industrial establishment consists of several separate buildings or open spaces, separated between them more than 10 m (or at least a distance of at least the height of the fuel materials stored, if this is more than 10 m in open spaces) free of combustible goods, these may be considered separately for the purpose of assessing the need to put such hydrants to each building or open space.	*(or a distance of at least the height of the fuel materials stored, if this is greater than 10 m in open spaces) free of combustible goods, these may be considered separately for the purpose of assessing the need to put hydrants of this type to each building or open space.*	
530	Subdirectorate-General for Industry, Government of Valencia	ANNEX III – ACTIVE PROTECTION FACILITIES 3.3 Direct-pumping hydrants 3.4. The direct-pumping hydrants installed according to section 3.3 can also be used to meet the requirements of having hydrants for truck filling referred to in section 3.2, always complying with the above.	There is an error: point 3.4 should be 3.3.4	R. There is no error in the numbering. Point 3.4 is intended to be separate from 3.3.
531	Subdirectorate-General for Industry, Government of Valencia	ANNEX III – ACTIVE PROTECTION FACILITIES 3.3 Direct-pumping hydrants 3.4. ... 3.5. ...	There is an error: point 3.4 should be 3.3.5	R. There is no error in the numbering.
532	Official College of Industrial Engineers of the Valencian Community	Annex III, point 3.5	Annex III, page 7. It does not specify, leaving it to the project executor to consider different alternative or exclusionary scenarios without defined criteria.	R. The current text is clear enough. No changes are necessary.
533	particular	Section 4. 'Fire extinguishers' of RSCIEI Annex III, in the text *'Portable fire extinguishers will be installed in all fire sectors of industrial establishments'*.	It could be understood that establishments intended for 'Warehouse Use' that do not qualify as an industrial establishment in accordance with the RSCIEI – whose endowment requirements are set out in Annex III to RSCIEI – do not require the installation of portable extinguishers. I understand that, as a minimum, portable extinguishers should be available, as set out in Table 1.1. of Part SI 4 'Fire	R. Annex III applies to all establishments that are required to comply with the RSCIEI.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			Protection facilities' of the Basic Document DB-SI.	
534	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex III, section 4. Fire extinguishers	It would be good to introduce a Table of equivalence between efficiencies of extinguishers	R. This type of table is not deemed necessary in the regulatory text. That in any case, that could be put (in an informative way) in the guide of the RIPCI, which is where extinguishers are regulated.
535	Subdirectorate-General for Industry, Government of Valencia	ANNEX III – ACTIVE PROTECTION FACILITIES 4. Fire extinguishers	It should be indicated that these are the fire classes A/B/C/D. It could be put, according to standard UNE-EN 2, ...	R. The standard governing extinguishers is cited in the RIPCI. It is not appropriate to cite it here.
536	Subdirectorate-General for Industry, Government of Valencia	Table 3.4.2. DETERMINING THE PROVISION OF PORTABLE FIRE EXTINGUISHERS IN FIRE SECTORS WITH FIRE LOAD FROM CLASS B FUELS. NOTE	In the notes to Table 3.4.2, for Class B fires (fuel liquids), it should be indicated that the requirements cited in this are complementary to those of the specific sectoral regulations (Oil Plants Regulation, Chemical Storage Regulation, etc.) in the current RD 2267/2004.	R. This matter is already addressed by Rule 1.2 of the Regulation. No further detail is required.
537	CEPREVEN	Annex III, section 4.2 Note 2: Where the volume of liquid fuels in the sector or fire area (V) exceeds 200 litres, the number of portable extinguishers will be increased by adding mobile extinguishers on wheels of a minimum efficiency II B (e.g. 50 kg BC or ABC powder, or an equivalent of water with additives), for the following reasons: a) An extinguisher, if V is greater than 200 litres and less than or equal to 750 litres. b) Two fire extinguishers, if V is greater than 750 litres. c) In the case of sectoral regulations, the provisions therein will apply.	It is not clear whether the application of heading (c) is carried out replacing or in addition to to headings (a) or (b).	A. Make the phrase more detailed, so that it is clearer.
538	SFPE Spain	Annex III, 4.4 The location of the portable extinguishers will allow them to be easily visible and accessible, will be located close to the points where the fire is	In the case of warehouses of large volume products requiring the use of forklifts (e.g. paper coils), if extinguishers were installed on all trucks, could the maximum horizontal route be increased?	R. The distances are the ones set in the text. It does not matter the type of extinguishers that are installed. Changing the text is not appropriate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		most likely to start, and their distribution will be such that the maximum horizontal route, from any point in the fire sector to the extinguisher, does not exceed 15 m.		
539	particular	Annex III point 5. Equipped fire-hydrant systems. The following exception to the installation of firefighting fixtures is included: '*As an exception to the above, in automatically operated storage areas where the activity prevents people from accessing, the non-installation of equipped fire hydrants may be justified*'	It is proposed to consider that a data processing centre has some type of exceptionality for installing firefighting fixtures inside in order to limit the risk in the operation of electronic equipment inside it. Or at least that it is allowed to be located outside the fire sector. provided that firefighting fixtures located in the accesses that allow to reach all fire areas with the maximum permitted length for the hoses and not to a maximum of 25 m.	A. Text has been added to address this matter.
540	particular	Section 5.2. 'Type of firefighting fixtures and water needs' in Annex III of RSCIEI.	In the case of buildings or establishments for use Warehouses intended for mini warehouses for communities of owners, when providing firefighting fixtures is required, these will be of type 45 mm. According to the current articulation of the CTE-DB-SI, in a fire sector for use Parking integrated in a residential building – which can have storage rooms that open directly to the same or storage areas – when the provision of firefighting fixtures is required, type 25 mm is allowed. It seems that the requirements relating to the firefighting fixtures requirement are more restrictive for an adaptation in a premises of an existing building for use as storage rooms, linked to a community of owners, than if it were a new floor building, intended for residential use housing, garage and storage rooms.	R. It is understood that the current wording of this section already correctly contemplates when to install each type of firefighting fixtures and, in certain cases, several alternatives are given. Making change sis not appropriate.
541	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	Annex III Fire Safety Regulation in industrial establishments. 5. Firefighting-fixture systems 5.2 Type of firefighting fixtures and water requirements Table 3.5.1	**An amendment is proposed:** It is proposed to amend Table 3.5.1 by prescribing that, for intrinsic risk level/medium risk 25 mm, firefighting fixtures should be installed. **Justification:** The practice of handling firefighting fixtures has shown that when 45mm firefighting fixtures reach a shelf, column, pallet, box or any other rigid obstacle with a 90º angle, this	A. The text of the table has been changed.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			leads to a strangulation of the flat hose in this firefighting fixture, and therefore a cut in the water supply. In the Regulation, the firefighting fixtures of 45 are reserved precisely for those places of greatest risk, which in a large number of cases will coincide with large logistic warehouses with a large number of shelves, packages, pallets etc. that make the use of 45 mm firefighting fixtures unfeasible. Use that must also be used by two people. It is proposed to change to 25 mm to be handled by staff without specific, training and avoid the collapse of the hose in these situations. If we add to this that at pressures between 4 and 8 bar, the range of the firefighting fixtures of 25 reaches up to 15 m is very suitable for this type of risk.	
542	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex III, 7. Fixed automatic extinguishing systems Section 7.1. Page 102.	Increase the minimum surface area for automatic sprinklers to A_H, both in storage activities (from 300m^2 now to 1,000m^2 at medium risk ,and there is no high risk to 600m^2) as manufacturing (500m^2 now 1,500 m^2 at medium risk and no high risk to 750m^2). This significantly increases the risk of this typology, since the requirements of sector size, enclosure resistance and structure are also reduced, and they are allowed to contain high-risk sectors. PROPOSAL: Leave the current requirements of 300 m^2 storage and 500 m^2 for manufacturing.	R. Type Ah is a new type whose requirements are at an intermediate point compared to the former 2004 Types A and B. The requirements placed on them are between the two. It is not appropriate to apply the same requirements to the new Av and Ah types, since their case studies are different.
543	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex III, 7. Fixed automatic extinguishing systems **Section 7.1. Page 102.**	CLARIFICATION: Why does it not include water mist that is collected in the RIPCI?	C. The submission is a comment that does not include specific proposals. On the other hand, section 7.1.2 already states that sprinklers can be replaced by other automatic extinguishing systems, so it is not necessary to list them all in Annex III.
544	European Fire Sprinkler Network	Annex III 7. Fixed automatic extinguishing systems 7.1.1 Note: Where there are both manufacturing and permanent storage ac-	As discussed above, the use of the term 'day store' is not consistent and should be included in calculating the fire load. This should therefore also be cancelled from the following section. Proposal for amendment: Annex III 7. Fixed automatic extinguishing systems	PA. With regard to the above-mentioned note, the current text is correct and appropriate with regard to the situation to be envisaged. That note does not need to be changed.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		tivities in a sector (without considering as such the 'day store'), the installation of these systems will be necessary where the sum of the ratios between the surface area intended for manufacture and that intended for storage, between the area from which the installation is mandatory in each case, is equal to or greater than 1, as follows: [(Manufacture surface area/surface area from which installation is mandatory for manufacturing) + (Storage surface area/surface area from which the storage facility is mandatory)] ≥ 1, and must be the sum of both areas equal to the area of the sector	7.1.1. Note: Where there are both manufacturing and storage activities in a sector, the installation of such systems will be necessary where the sum of the ratios between the area intended for manufacture and that intended for storage, between the area from which the installation is mandatory in each case, is equal to or greater than 1, as follows: [(Manufacture surface area/surface area from which installation is mandatory for manufacturing) + (Storage surface area/surface area from which the storage facility is mandatory)] ≥ 1, and must be the sum of both areas equal to the area of the sector	On the other hand, a new paragraph has been added to consider the cases of large low-risk sectors with unevenly distributed fire loads, where it is determined whether it is necessary to install such protection systems.
545	CEPREVEN	Annex III, section 7.3 Physical foam systems will be installed in those sectors and fire areas where installing them is mandatory in accordance with the provisions in force that regulate fire protection in industrial, sectoral or specific activities and, in general, where there are areas of a fire sector in which flammable liquids are handled that, in the event of fires, may spread to other sectors.	It is suggested to add the following clarification, in order to avoid the installation of inappropriate foam systems with regard to the risk to be protected: *Physical foam systems* ***will be installed appropriate to the risk to be protected according to the applicable technical standards,*** *in those sectors and fire areas where its installation is mandatory in accordance with the provisions in force that regulate fire protection in industrial, sectoral or specific activities and, in general, where there are areas of a fire sector in which flammable liquids are handled that, in the event of fires, can spread to other sectors.*	A. Text has been added on this matter.
546	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX III. Point 7.3	'Physical foam systems will be installed in those sectors and fire areas where their installation is mandatory in accordance with the provisions in force governing fire protection in industrial, sectoral or specific activities and, in general, where there are areas of a fire sector in which <u>flammable liquids</u> that, in the event of fires, may spread to other sectors.' **<u>Requested:</u>** objectively define what is deemed flammable	A. It is chosen to delete this part of the sentence, as the cases where they are required are already included in the specific regulations.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			liquids. For example, within the scope of the RAPQ, those liquids with a flashpoint below 55ºC, or referring to the risk phrases H. At this point, it can be said that there are household consumer products that do not have a safety sheet, and therefore nor risk phrases because they are outside the scope of the European CLP Regulation, being cosmetics, for example. And nevertheless, the alcoholic content or the non-miscibility in water make jet water an ineffective and counterproductive means of extinction.	
547	particular	Annex III Point '*7.5 Fixed gas extinguishing systems*' provides for the installation of gaseous extinguishing agents instead of water systems because they can damage electronic equipment.	It is not clarified whether firefighting fixtures are considered water systems. Even if the firefighting fixtures are operated manually, the installation of the fire hydrant together with the supply network to them within a calculation centre or a data processing centre already poses a risk to such equipment in the event of any breakage of pipes or elements of the fire hydrant.	R. Fire hydrants are considered separately in both RIPCI and RSCIEI. They are not an automatic extinction system.
548	CEPREVEN	Annex III, section 7.5. Gaseous extinguishing systems will be installed in the fire sectors of industrial establishments, where they constitute enclosures where electronic equipment, calculation centres, data banks, control or measurement centres and suchlike are located, and protection with water systems may damage such equipment. They will also be installed in those fire sectors where installing them mandatory in accordance with the provisions in force that regulate fire protection in sectoral or specific industrial activities.	It is indicated that gaseous extinguishing systems will be installed in the fire sectors of industrial establishments, when these constitute enclosures where electronic equipment is located. However, the concept of *electronic equipment* is very broad, thus it would range from a desktop computer or mobile phone to a large control room. We therefore suggest narrowing down the scope of application of gaseous agent extinction systems a slightly more.	A. The paragraph has been clarified. In any event, we understand that this depends on the specific case, and that it must be at the discretion of the project executor and the needs of the owner.
549	CEPREVEN	Annex III, section 7.5. In any event, this type of system can only be installed and used when the safety and evacuation of people is guaranteed. Otherwise, it should be opted to install a different fixed ex-	With the current wording, the question remains as to whether any process control room should have a fixed extinguishing system, by gaseous agents, when the safety and evacuation of people is guaranteed, or alternative when it is not. We therefore suggest revising the text in order to achieve greater concreteness.	A. The text has been clarified.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		tinguishing system.		
550	CEPREVEN	Annex III, section 7.5 Gaseous extinguishing systems will be installed in the fire sectors of industrial establishments, where they constitute enclosures where electronic equipment, calculation centres, data banks, control or measurement centres and suchlike are located, and protection with water systems may damage such equipment. They will also be installed in those fire sectors where installing them mandatory in accordance with the provisions in force that regulate fire protection in sectoral or specific industrial activities. In any event, this type of system can only be installed and used when the safety and evacuation of people is guaranteed. Otherwise, it should be opted to install a different fixed extinguishing system.	The following clarification is suggested, in order to interpret these systems as replacing other water-based regulations as an option, not as an obligation: *Gaseous extinguishing agents will be installed in the fire sectors of industrial establishments, when they constitute enclosures where electronic equipment, calculation centres, data banks, control or measurement centres and similar are located, and the protection with water systems* ***required in regulation*** *may damage such equipment. They will also be installed in those fire sectors where installing them mandatory in accordance with the provisions in force that regulate fire protection in sectoral or specific industrial activities.* *In any event, this type of system can only be installed and used,* ***voluntarily****, when the safety and evacuation of people is guaranteed. Otherwise, it should be opted to install a different fixed extinguishing system.*	A. The text has been clarified. (The wording proposed in the comment is not used, but another alternative that addresses the same subject.)
551	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex III, 8. Smoke and heat monitoring systems. Section 8.1. Page 105. Eliminating fumes and gases from combustion and with them from the heat generated, from the spaces occupied by fire sectors of industrial establishments, should be carried out in accordance with the typology of the building in relation to the characteristics that determine the movement of smoke.	In the Regulation, the typology of the building is defined by its relationship with the neighbours (Type A, B,...). This typology is not taken into account here, in order to define the requirement of SCTEH, it only affects the area of the sector and its risk. On the other hand, the system is required of a sector, not a building, and should be designed according to its risk, volumetry and other characteristics that determine the movement of smoke. PROPOSAL: **Modify the text to read as follows:** *'The removal of fumes and gases from combustion and with them from the heat generated, from the spaces occupied by fire sectors of industrial establishments, must be carried out in accordance with their volumetry, risk and other characteristics that determine the movement of smoke.'*	A. The has been amended.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
552	SFPE Spain	ANNEX III 8. Smoke and heat control systems	Note in paragraph 8.2 Typo. 'quotients' should be 'coefficient'	R. There is not error. The word 'quotient' means 'Result which, in the arithmetic operation of the division, is obtained by dividing one amount (dividend) by another (divisor)'.
553	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex III, 8. Smoke and heat monitoring systems. Section 8.3. Page 105.	The Regulation must clearly define the safety objectives it pursues, and require the protection systems it considers to enable those safety objectives to be met. In the case of the SCTEH they may be protecting the means of evacuation, facilitating the firefighting operations, controlling the temperature that affects the structure, etc. The application of the Regulation must be consistent with the objective of this system (increased travel or reduction of fire resistance) and with its mode of activation. The reference UNE standard does not establish criteria or calculation procedures for objectives other than evacuation objectives, so that the regulations must define them so as not to leave the project executor without exit. PROPOSAL: Define whether these systems are required for specific objectives, and define the criteria for systems whose objectives are different from the protection of means of evacuation.	A. A paragraph has been added defining the objectives of the system in each case.
554	European Fire Sprinkler Network	Annex III 8. Smoke and heat control systems. 8.3. The design and implementation of the systems referred to in section 8.2 will be carried out in accordance with the heading for those systems in Annex I to the RIPCI, in accordance with paragraph 13.1.a) of temperature control and smoke evacuation systems based on buoyancy strategies. In particular cases where the technical non-advisability of installing a system in accordance with section 13.1.(a is justified, it may be replaced with other systems referred to in the RIPCI (Annex I, paragraph	The intention and necessity of these systems is not clear in the regulation. This is the reason for confusion in the sector. Therefore, the original intention of the system aimed at supporting firefighters should be clarified; unless another intention is deemed by the project executor. Proposal for amendment: Annex III. 8. Smoke and heat control systems. 8.3. The design and implementation of the systems referred to in section 8.2 will be carried out in accordance with the heading for those systems in Annex I to the RIPCI, in accordance with paragraph 13.1.a) of temperature control and smoke evacuation systems based on buoyancy strategies. The basic design of the system should be intended for the intervention of firefighters, unless specified differently by the project executor. In particular cases where the technical non-advisability of installing a system in accordance with	A. A paragraph has been added defining the objectives. (The text differs from that of the submission proposal, although it addresses the same issue)

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		13.1), provided that the appropriateness of the system for the specific place and use is justified.	section 13.1.(a is justified, it may be replaced with other systems referred to in the RIPCI (Annex I, paragraph 13.1), provided that the appropriateness of the system for the specific place and use is justified.	
555	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX III. Point 8.3 Smoke and heat control systems	'8.3. The design and implementation of the systems referred to in section 8.2 will be carried out in accordance with the heading for those systems in Annex I to the RIPCI (...)'. **RIPCI-2017, ANNEX I, SECTION 13.1(a)** The ventilation systems for smoke and heat evacuation based on buoyancy strategies will be composed of a set of openings (natural aerators) or mechanical extraction equipment (mechanical aerators) for the smoke extraction and hot gases from fire combustion, by clean-air intake openings or mechanical clean air supply fans and, where applicable, by smoke control barriers, dimensioned **so as to generate a smoke-free layer above the floor level of the fire and maintain the average smoke temperature within acceptable levels**. The temperature control and smoke evacuation systems by buoyancy will be projected in accordance with **UNE 23585.** The design of the SCTEH according to UNE 23585 is not clear for warehouses of a great height. The contradictions of the aforementioned standard, with which these systems must be designed in a prescriptive manner, are explained below. For example, from point '6.2.2. Requirements', paragraph (e), for the assurance of **evacuation** of users, the smoke-free height is 2.50 m. However, point (i) obliges designing the smoke layer 0.50 m above the goods without clarifying the reason very well, which would correspond to the objective of protecting the goods. Thus, point (e) makes no sense if the smoke-free layer must always be more than 0.50 m above the merchandise, about 11 m high in logistic warehouses. Another unresolved issue in the text of the RSCIEI project is the SCTEH **activation**. Considering the existence of sprinklers in 100 % of logistics warehouses (point 7.1 of UNE 23585:2017). Therefore, if the main design objective of the SCTEH is evacuation protection, the activation should be **AUTOMATIC**,	PA. A paragraph has been added defining the objectives of the system in each case. It is understood that this largely covers what is requested in this submission (note that other related cases are addressed in other claims and in other sections of the RD). Regarding UNE standards, it should be noted that their content is studied and discussed in the Standardisation Committees (CTNs). If the current version of a standard has inaccuracies or lack of detail, improving its wording in updated versions can be requested in updated versions. In any event, it is understood that it is not necessary to elaborate further in the text of the DR on this matter.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			with the addition of a manual control system. On the contrary, if the main design objective is the protection of the property and the intervention of firefighters, the activation **ONLY MUST BE MANUAL**. **It is requested** that the legislator clarify which or what are the objectives of the SCTEH, and what the priority in the event they are multiple. Point 4(a) of UNE 23585:2017. In **ANNEX II. Part 3 Evacuation of occupants Table 2.3.1. Note 4. Point (c),** from which it appears that the existence of a SCTEH designed for the evacuation of the occupants would allow the extension of evacuation routes up to 100 %, but should be clarified. If protecting the evacuation were the main objective, the exemption of point 6.2.2. (i) is requested as normative, leaving the protection of the goods smoke-free at the discretion of the logistics operator. To end this matter, we will comment that depending on the design objective, the smoke layer temperatures have some values or others and, therefore, produce different aerodynamic surfaces areas, and so we insist on the **need to define the objective pursued by the existence of SCTEH in industrial establishments, especially in warehouses**.	
556	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX III. Point 8.3 Smoke and heat control systems	In **one-storey, high-rise (>12 m) warehouses and sector sizes of more than 4 000 m²**, the performance studies developed by APPUNLE members in the different Autonomous Communities show the following conclusions again and again: A SCTEH WITHOUT SMOKESCREENS, WITH MORE THAN 2 % AERODYNAMIC SURFACE OF OUTLETS ON ROOF AND FAÇADE OUTLETS FOR AIR INTAKE: – It is just as or more certain than the prescriptive design, as otherwise they would not be approved. – There is no risk of negative interaction of smokescreens with ESFR sprinklers, commonly used in these warehouses, ensuring their operation and early fire suppression. Therefore, by making the financial studies available to the legislator it deems appropriate to carry out the relevant verifications in this regard,	R. The proposal is too specific to be included in the rules of procedure. Specific cases can be solved with custom designs according to the options given in the articles. In addition, it is expected that this issue will be dealt with in the CTN within the scope of standardisation, and that future versions of the UNE standards for the design of these systems will reflect these particular cases.

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			IT IS REQUESTED: To include a simplified prescriptive section exclusively for warehouses of height greater than 12 m and an area greater than 4 000 m², protected by Early Suppression Fast Response (ESFR) sprinklers, where a SCTEH consisting of: –2.5 % aerodynamic surface area of roof outlets, placed according to UNE 23584, with MANUAL or AUTOMATIC activation. If this is the second case, it is proposed to set a delay of at least 10 minutes in opening, to allow the action of the fast response and early suppression sprinklers. – An aerodynamic area of 12 m²/2 000 m² of constructed area of the sector, for the inlet of air by means of façade outlets, the upper part of which cannot be more than 7 m from the level zero of the warehouse. – No smoke screens. We emphasise that there must be ESFR sprinklers, since the objective of the other type of sprinkler is to control the fire while calling on the extinguishing services, while the ESFR sprinklers, common in logistic warehouses, have as their mission to extinguish the fire completely in the first minutes of it. (See standard UNE 23585, normative annex J).	
557	SFPE Spain	ANNEX III 8. Smoke and heat control systems	Paragraph 8.3 It is not logical that smoke ventilation requirements and their objectives should not be defined in this paragraph. This highly important paragraph refers to the RIPCI (which refers directly to UNE 23585:2017). Here, it is essential that calculating the ventilation system can to be carried out based on regulations of recognised international prestige.	PA. The objectives of the system have been added. On the other hand, the systems cited must comply with what the RIPCI establishes. Several options are given in the RIPCI itself, and there is even the way to use equivalent solutions. This means it is not appropriate to state here that other regulations can be used.
558	SFPE Spain	ANNEX III 8. Smoke and heat control systems	Paragraph 8.3 It is not understood why a buoyancy-based strategy is preferred to a mechanical system. There is no scientific evidence to show that one system is better than another in any absolute way. This depends on each establishment. In the previous RSCIE, the possibility of mechanical/forced ventilation was left in.	R. The regulation section gives several options as to what types of systems can be used. In any event, the buoyancy strategy is not at odds with using mechanical ventilation.
559	particular	Annex III	Manually opening the vents is not useful if it is not accessi-	R. The current wording is sufficient. It is

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		8. Smoke and heat control systems ... 8.4 Final paragraph: Preferably, the gaps will be arranged evenly distributed in the upper part of the sector, either in high façade or roof areas. The openings can be opened manually, automatically or permanently.	ble to intervention firefighters. Proposal: 8.4 Final paragraph: Preferably, the gaps will be arranged evenly distributed in the upper part of the sector, either in high façade or roof areas. The ~~openings can be opened manually, automatically or permanently~~. they must be manually accessible to firefighters from their outside accesses, be opened automatically or be opened permanently.'	not deemed necessary to add further detail.
560	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex III, 8. Smoke and heat monitoring systems. Section 8.4. Page 105. In sectors of medium or high risk of less than that indicated in section 8.2, systems for the control of smoke and heat will be installed in accordance with section 8.3 or, alternatively, ventilation holes that facilitate smoke extraction (which will not count as systems for the control of smoke and heat, these being a simplified solution and falling outside the scope of the RIPCI), may be taken as a reference for its design the following hollow values, by reason of...	The requirement to install smoke and heat control systems in all medium or low risk sectors, regardless of their surface area, does not seem compatible with the sectoring interior rooms that do not have direct communication with the outside (not adjacent to the façade or they're not reaching roof). Through this requirement, it promotes the absence of sectorising small internal volumes with medium or high specific risks (such as technical rooms or storage tanks) located below ground or above ground without direct exit to the outside, since for the installation of smoke outlets to be compatible with the sectoring, the possible technical solutions (driving of smoke outlets) make the installation more expensive and complicate the installation without bringing a substantial improvement to safety. It will, in most cases, be more profitable to keep all fuels in an open space without sectoring, especially when the establishment is already at high risk and can support fuels without limit. In addition, according to the CTE DBSI, special risk premises (not counting as sectors) are not required to do so. This requirement is much more unfavourable in RSCIEI when the risk could be similar. PROPOSAL: **Establish a minimum area to make such smoke and heat control systems mandatory in medium or high-risk sectors and therefore does not prejudice the deployment of small-scale special risk rooms.**	A. A minimum area has been added to apply the requirement, so that this section is not disproportionate.
561	Catalonia Safety Cluster Against	**Annex III. Section 8.4(6). Page 106.**	We consider that without mechanical ventilation design criteria, the regulatory requirement of section 8.3 of Annex III	A. New text has been added reflecting the requirements for cases of forced

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	Fires (CLÚSIC)	In the following text: Preferably, the gaps will be arranged evenly distributed in the upper part of the sector, either in high façade or roof areas. The openings can be opened manually, automatically or permanently. In addition, gaps for air intake in the lower part of the sector must be available, in the same proportion of surface area required for smoke outlets, and the gaps in the access doors to the sector that communicate directly with the outside may be counted. Ventilation will be natural, unless the location of the sector prevents it; in such a case, it may be forced.	to have ventilation in sectors of medium risk or less than that indicated in section 8.2, in the particular case of low-level sectors, cannot be met. Or else, in these sectors it would be the only alternative to carry out the design according to section 8.2 and therefore according to section 13.1.a) of the RIPCI, since the other system of section 13.1 of the RIPCI that could be applied (13.1.d) does not indicate how to dimension the mechanical extraction system. The requirement of 12 renewals per hour of France's IT 246 was taken as a reference, equating this ratio to the most critical of the natural ventilation ratios required in section 8.4 of the RSCIEI and determined the ratios for the other two cases proportionally. **PROPOSAL:** Add the following text so as to resolve, with guarantees of operation, the ventilation of smoke in sectors below ground where it cannot be solved by the priority option of natural ventilation with the following considerations. i. It will be sized for an extraction flow corresponding to 6, 9 or 12 renewals per hour of the sector volume corresponding to the natural ventilation ratios referred to in sections (a), (b) and (c) above; ii. Extractors will have a classification F400120. If ducts are used for the extraction of smoke or for the supply of air that are immersed in the fire sector, they must be rated E60060 if they run through a single sector, or EI 120 if they pass through fire compartmentalising elements. iii. The air supply will be carried out naturally, unless the location of the sector prevents it, in which case it will be carried out mechanically in the lower part of the sector at a proportion of 80 % of the flow required for the smoke outlet and with only manual activation by the Extinction Services from an easily accessible and locatable control post.	ventilation in this section.
562	Prevention Service of the Directorate-General for Preventing, Extinguishing	Annex III to the RSCIEI, section 8.4, first and final paragraphs '8.4. In medium or high-risk sectors smaller than that referred to in section 8.2 above, smoke and heat con-	The installation of mechanical ventilation systems for smoke extraction that are outside the application of the RIPCI does not give guarantees for their use. On the other hand, the mechanical contribution of air to the fire sectors, if this is not part of a system designed and exe-	PA. Minimum surface area has been added. And new text has been added reflecting the requirements for cases of forced ventilation in this section.

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	Fires and Rescues, Government of Catalonia	trol systems will be installed in accordance with paragraph 8.3, or, alternatively, ventilation gaps may be available to facilitate the smoke extraction (which will not be counted as systems for the control of smoke and heat, these being a simplified solution and falling outside the scope of the RIPCI), and the following hollow values may be taken as a reference for its design, on the basis of:' 'Preferably, the gaps will be arranged evenly distributed in the upper part of the sector, either in high façade or roof areas. The openings can be opened manually, automatically or permanently. In addition, gaps for air intake in the lower part of the sector must be available, in the same proportion of surface area required for smoke outlets, and the gaps in the access doors to the sector that communicate directly with the outside may be counted. Ventilation will be natural, unless the location of the sector prevents it; in such a case, it may be forced.'	cuted with the aim of temperature control and the smoke extraction, can cause the revival of fire. Therefore, it is proposed to limit the option that ventilation by means of alternative gaps required in section 8.2 is forced, proposing that it can only be natural. Lastly, it is proposed that very small sectors (< 100 m^2) should not be required of any type of system for the control of smoke and heat, due to the relative risk assumed of their total combustion in the event of fire. In view of the above, it is proposed to replace the first paragraph with: '8.4. In medium or high risk sectors that have a constructed surface area greater than 100 m^2, but less than that referred to in section 8.2, systems for the control of smoke and heat as referred to in section 8.3 will be installed or, alternatively, natural ventilation holes may be available to facilitate the smoke extraction (which will not count as systems for the control of smoke and heat, these being a simplified solution and being outside the scope of the RIPCI), the following hollow values may be taken as reference for their design, for the purpose of:' And in the last paragraph, where it states 'Ventilation will be natural unless the location of the sector prevents it; in such a case, it may be forced' to replace with 'The ventilation by means of holes will be exclusively natural.'	
563	CEPREVEN	Annex III, section 8.4 Preferably, the gaps will be arranged evenly distributed in the upper part of the sector, either in high façade or roof areas. The openings can be opened manually, automatically or permanently. In addition, gaps for air intake in the lower part of the sector must be available, in the same proportion of surface area required for smoke outlets, and the gaps in the	The following clarification is suggested: *Preferably, the gaps will be arranged evenly distributed in the upper part of the sector, either in high façade or roof areas. The openings can be opened manually, automatically or permanently. In addition, gaps for air intake in the lower part of the sector must be available, in the same proportion of surface required for smoke outlets, and the gaps in the access doors to the sector that connect directly with the outside,* ***which may likewise be usable manually, automatically or be permanently open****. Ventilation will be natural, unless the location of the sector prevents it; in such a case, it*	R. There is no need for this clarification to the text, which is already clear enough. Moreover, the requirements for doors are already set out in Annex II.

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		access doors to the sector that communicate directly with the outside may be counted. Ventilation will be natural, unless the location of the sector prevents it; in such a case, it may be forced.	*may be forced.*	
564	KREAN S.COOP	Annex III Part 8 Smoke and heat control systems section 8.4	It is required to install smoke ventilation for medium and high risks with surface areas lower than those indicated in section 8.2. In this section, it states: *'8.4. In sectors of medium or high risk of less than that indicated in section 8.2, systems for the control of smoke and heat will be installed according to section 8.3, or alternatively to these, ventilation holes may be available to facilitate the smoke extraction (which will not be counted as systems for the control of smoke and heat, these being a simplified solution and falling outside the scope of the RIPCI), and the following hollow values may be taken as reference for their design, due to:* (...)" It is proposed to eliminate this obligation or, if not, to consider that installation carried does in fact count as a smoke evacuation system. Otherwise, what is it for?	R. This section allows, in intermediate situations, to use simplified systems. Therefore, it has special considerations. The section should not be deleted.
565	particular	Section 9. 'Emergency lighting' of RSCIEI Annex III, in the text *'9.1. The fire sectors will have an emergency lighting installation for the evacuation routes when [...]: b) They are located on any plant above ground, when the occupation, P, is equal to or greater than 10 people and is of an intrinsic medium or high risk'*.	In an establishment, located on the ground floor, intended for the 'storage use', intended entirely for mini-stores, it could be frequent be the case that the occupation is less than 10 people and, therefore, the installation of emergency lighting in the evacuation routes would not be required. I understand that the provision of emergency lighting should be required in this type of establishment, as prescribed in section 2.1(1-d) of section 4 of the basic document SUA 1JSecurity of use and accessibility', regardless of its occupa-	A. The emergency lighting section of Annex III has been rewritten. In this way, it is chosen to refer to the CTE DB SUA for all cases.

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			tion.	
566	CEPREVEN	Annex III, section 9.3 9.3. The installation of emergency lighting systems will comply with the following conditions: [...]	It is suggested that the following clarification be added: *9.3. Without prejudice to the basic requirement SUA 4 of the Basic Document 'DB-SUA Safety of use and accessibility', the installation of emergency lighting systems will comply with the following conditions:*	A. The emergency lighting section of Annex III has been rewritten. In this way, it is chosen to refer to the CTE DB SUA for all cases.
567	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	ANNEX IV. Punto1. Storage with storage systems on metal shelves	Instead of describing storage systems directly in the text of the article, it is requested since it is deemed more appropriate to refer to standard UNE-EN 15878:2011, because it includes many more terms regarding the storage systems that are currently being used and with a greater definition of them.	R. For the purpose sought with these descriptions, it is deemed more convenient for reading comprehension and the structure of the annex, to include the description in the text of the regulation and not to make references to external documents.
568	Superior Council of the Colleges of Architects of Spain	ANNEX IV. AREAS WITH PARTICULAR CONDITIONS	In sections 1 and 2 on storage with storage systems on metal shelves and raised walkways and mezzanines: Figure 4.1 with the classification of storage systems in metal racks, it seems that nothing else is considered in closed establishments type A, B and C, however, it is not clear whether in type D spaces could also be considered. If so, it would be advisable to clarify it by means of a note or graphic diagrams. The same applies to raised walkways and mezzanines, in Figure 4.2 on classification of raised walkways and mezzanines does not include open spaces type D. In section 3 on open spaces occupied by structures supporting enclosures formed by textile elements, no reference is made to storage systems on metal shelves or to raised walkways or mezzanines. In point 4 on storage of specific products, very specific situations and types of establishments are analysed, it should be clarified why these cases do not extend to more types of establishments, for example why it only poses tyres stored abroad or why the storage of cereals, flour and feed only applies in type-C establishments.	R. In D-type spaces (open spaces) the casuistry is different from that of other cases. The figures have been designed for buildings. The same applies to section 3. With regard to point 4, its aim is to address specific frequent situations. It is not intended to be applied generally.
569	Catalonia Safety	Annex IV, 1. Storage with storage sys-	The requirement of B-s1,d0 draws attention when com-	PA. The text on the coatings has been

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	Cluster Against Fires (CLÚSIC)	tems on metal shelves. Clause from 1.2b Page 109. Coatings (e.g. painted or coated) with thicknesses of less than 100 µm must be of at least the kind of fire response B-s3,d0. If this thickness exceeds 100 µm, it must be at least of Class B-s1,d0.	pared to that of 'Occupiable Areas, C-s2,d0'. B is the one that gives information on combustibility, the s on smoke production. It is understood that B is requested, but not s1. There is no requirement for the fire response of non-metallic floors (such as wooden floorboards). PROPOSAL: include a fire response requirement for non-metallic floors and leave B-s3,d0 for coatings.	changed. On grounds, a text has been added in the section on mezzanine. (It is understood that, where asking for requirements makes more sense is in that section, and not in this one.)
570	KREAN S.COOP	Annex IV Part 1 Section 1.2 1.2. General requirements for all storage systems on metal shelves. a) The materials of frames, long lines, metal panels, trusses, beams, metal floors and other metal elements and accessories that make up the system must be of fire response class A1.	Currently, they are also made with wooden flooring: what about these layouts?	PA. A text has been added in the mezzanine section. (It is understood that, where asking for requirements makes more sense is in that section, and not in this one.)
571	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Annex IV, 1. Storage with storage systems on metal shelves. Clause from 1.3b** Page 109. a) for the main structure of self-supporting storage systems with metal racks (operated manually or automatically), it will be permissible not to justify their fire resistance provided that they are protected by an automatic sprinkler system or other equivalent fixed automatic extinguishing system and, in addition, they are located in type-B or C buildings. In other cases of self-supporting storage systems (not protected by fixed automatic extinguishing systems, or	Due to the type of structural elements with which they are built, self-supporting storages cannot guarantee an R15 or R30. In order to compensate for this reduction in demand compared to the tables in Annex II, not to limit this type of construction and not to undermine safety, it should be required to justify that its deformation and eventual collapse does not damage the compartmentalisation, or fall onto the neighbours. This way, safety is also guaranteed during the intervention. However, if there is a collapse, it will be difficult for the spread to other buildings not to occur, especially if they can be installed in type-B buildings. PROPOSAL: **Modify the text to read as follows:** 'a) For the main structure of self-supporting storage systems with metal shelves (operated manually or automatically), it will be permissible not to justify their fire resistance provided that they are protected by an automatic sprinkler sys-	R. It is not deemed necessary to ask for further justifications from the calculation engineer. The requirements that have been established are sufficiently clear.

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		located in buildings of type A_H or A_V), the fire resistance of its main structure will be at least that required in Part 5 of Annex II for structures with a bearing function. b) In self-supporting storage systems of slim dimensions (higher than width) of more than 3 m high, it should be justified that, in the event of collapse, this does not occur towards the outside of the building.	tem or other equivalent fixed automatic extinguishing system and, in addition, are located in type-C buildings. b) In self-supporting storage systems in sectors of medium or high risk, it should be justified that the deformations caused by the fire do not damage the compartmentalisation. In addition, if their height is greater than the distance to other buildings or the boundary of the property, they must justify that, in the event of a collapse, it does not occur towards the outside of the building.'	
572	SFPE Spain	Annex IV, 1.3 (b) In self-supporting storage systems of slim dimensions (higher than width) of more than 3 m high, it should be justified that, in case of collapse, this does not occur towards the outside of the building.	In self-supporting storage systems of slim dimensions (higher than width) of more than 3 m high, it must be justified that, in the event of collapse, it does not occur towards the outside of the building.	R. It is not deemed necessary to ask for further justifications from the calculation engineer. The requirements that have been established are sufficiently clear.
573	APICI	Annex IV, Part 1. Storage with storage systems on metal shelves. Section 1.5.	It is not specified what corresponds to 'hand-operated metal shelving systems' in point 1.5. Does it include the mechanised storages mentioned in the previous Regulation? Does it include operation with forklifts and mechanised trolleys? It is proposed to include this term in the title of section 1.5: 1.5. Specific requirements for manually operated metal shelving systems **or machined (forklifts, trolleys, etc.)**	R. Point 1.5 sets out one of the cases defined above in point 1.1 and Figure 4.1. It thus defines what each thing means.
574	particular	ANNEX IV RSCIEI. Section 1.5 d. Cross passageways between shelves.	Cross passageways between shelves are required every 20 m. Previously, for manual mechanised operating warehouses (trolleys), if the occupancy was less than 25 p, this distance was allowed to be multiplied by two, i.e. 40 m. This is the case in logistic warehouses: low occupancy, use of elevating trolleys. I propose either restoring this exception, or formulating the requirement in greater detail. The new regulation lowers the requirements in terms of evacuation routes, since it allows increasing the routes under certain circumstances. Instead, in this case, it would in-	A. An option has been added to extend the passageways to 40 m, with additional requirements.

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			crease them. This was not understood. In any event, it could be limited to 20 m, for sections that were left without alternative, but keep to 40 m, for when there is an alternative in the longitudinal corridor, which is usual.	
575	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex IV, section 1 1.6 b) 'sufficient openings should be available in the **accessible façade** to ensure access for SEIS staff at the level of the flush'.	Specify if ***accessible façade*** is required, in any case	A. Clarification has been added.
576	particular	ANNEX IV RSCIEI. Section 2. Elevated walkways and mezzanines.	In my view, the proposal, as drafted, will result in these logistics systems, which are on the market, being inapplicable in practice. I have the impression it has not been analysed how the market is in terms of logistics options, which respond to the users' requirements. I believe it deserves a more developed regulation, in order to combine the safety requirements with the real needs and with the technical options available. I propose a comprehensive review of the approach taken.	C. The submission does not give specific proposals. In any event, the text that has been put up has been studied previously and is deemed to be appropriate, and gives different possible solutions to be able to implement it. No need to make changes.
577	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex IV, 2. Elevated walkways and mezzanines. Clause from 2.2d Page 112. d) as an alternative to the fire resistance required in paragraphs (a) and (b) above, it may be decided not to justify the fire resistance of the mezzanine or raised walkway bearing structure when they are located in type-B buildings or C (or A_H or A or A_V if such structure is independent from that of the building) and in addition the entire fire sector considered has a fixed automatic extinguishing system (which must protect all levels of fire). and it must be effective in achieving the cooling of the structure) and a system for the control of smoke and heat according to para-	This alternative nullifies the requirements and level of safety required in sections (a) and (b) above. While it is not feasible that the mezzanines being built can comply with sections (a) and (b), it should not be sufficient for them to have sprinklers and SCTEH. The current RSCIEI and SP123 limit the maximum length of travel to 25m, meaning that the mezzanine is very small, and therefore it seems reasonable that the safety objectives can be met. The philosophy of the RSCIEI and all regulations is that there is passive and active protection. With this paragraph, if there is active this is already sufficient, which goes against the entire previous document. It is normal that when they are large, these mezzanines are permanently occupied and can have several levels. In case of sprinkler failure, or if the fire has a rapid development and the flames affect weak elements, if the structural design of the mezzanine does not take into account the fire, it is very likely all of the safety objectives (evacuation, intervention, spreading of fire-destruction of the sectoring) will	R. The current text is appropriate. The requirements currently requested in point (d) are sufficient, and it is not deemed necessary to add other requirements to perform 'advanced calculation methods' as requested in the submission. The purpose of the current text is to ensure that the requirements put in place do not lead to collapsing, and ensure fire extinction and evacuation, etc. No changes need to be made to the text.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		graph 8.3 of Annex III. The adoption of these measures will be applicable only in passageways or mezzanines that are open (without enclosures).	be compromised. Taking fire into account in structural design is indispensable. Most current mezzanines do not have this. When these structures are subjected to fire, horizontal forces are immediately generated. These structures do not usually carry braces to support these forces. These braces can only be installed if they are taken into account in the design. We should encourage future mezzanines to be built correctly, as they are increasingly larger and have a higher degree of occupation. PROPOSAL: **Amending the text as follows:** d) as an alternative to the fire resistance required in paragraphs (a) and (b) above for mezzanine or raised walkway, when located in type-B buildings, C or A_H, if the entire mezzanine or raised walkway and the fire sector concerned has a fixed automatic extinguishing system (which must protect all levels and must be effective in achieving the cooling of the structure), advanced methods of structural calculation may be chosen to justify that: – collapse of the structure of the mezzanine or raised walkway occurs inwards and does not damage the sectoring or façades – that a localised failure does not cause a chain collapse and – that the pillars of the building can withstand the forces induced by structural collapse. This measure will only apply in passageways or mezzanines that are open (without enclosures).	
578	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex IV, 2. Elevated walkways and mezzanines Clause from 2.2e Page 112. e) In all cases (a), (b), (c) and (d), the surface areas of the crossings or mezzanines is calculated in conjunction with that of the fire sector in which they are located and, in addition, the fire protection facilities listed in Annex III should be equipped. In addition, in case (d) the	The surface of the passageways or mezzanines should not be counted together with that of the sector for the calculation of the level of risk. Otherwise, there will be a large discrepancy for the same fuel in a separate storage layout (rack type) and a layout with mezzanine or raised walkway. In the first case all the fuel is divided between the surface of the sector, in the second the surface of the mezzanines has been added only because it has a passable soil (which may be solid or not, and the fire can spread in the same way). As the text currently stands, it is possible to multiply the amount of fuel material by each level of mezzanine or raised	PA. The fact of asking it to count as a surface area is because, in a way, they are treated like normal floors, so it is logical in that case that it computes that surface and must be protected as such. Therefore, the text is not modified as regards that part of the comment, except in the case of point (c), which is removed from the paragraph. On the other hand, the proposal made in the submission on evacuation lengths is not

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		length of evacuation routes originating in those areas does not need to exceed that indicated in Table 2.3.1 of Annex II, with note 4 to that table not being applicable in this case note.	walkway without implying an increase in the level of risk. On the other hand, if paragraph d) is amended as proposed and if it is possible to carry out 'plant departures', as defined by the CTE DB SI, in establishments with mezzanines or multilevel and provided that evacuation is guaranteed at the same level, there would be no problem to double the evacuation routes. It is requested to clarify that the surface of the passageways or mezzanines cannot be counted together with that of the sector for calculating the level of risk. It is also requested to clarify whether a sector that has such a mezzanine is deemed as ground floor. PROPOSAL: **Amending the text as follows:** 'e) In all cases (a), (b), (c) and (d), the surface area of the walkways or mezzanines must be fitted with the fire protection facilities listed in Annex III. In addition, in case (d) the length of evacuation routes originating in those areas may be doubled as indicated in Table 2.3.1 of Annex II, where it is ensured that there is more than one plant outlet at the same level as the worker and the expected worker density on the mezzanine or corridor is less than 1p/100 m^2'	considered appropriate, the current wording being preferable and stricter. Lastly, on whether the sector is deemed ground floor or not, a new explanatory paragraph has been added to the text.
579	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex IV to the RSCIEI, section 2.2(d) 'd) As an alternative to the fire resistance required in paragraphs (a) and (b) above, it may be decided not to justify the fire resistance of the mezzanine or raised walkway bearing structure when they are located in type-B buildings or C (or AH or AV if that structure is independent of the building) and in addition the entire fire sector concerned has a fixed automatic extinguishing system (which must protect all levels and must be effective in achieving the cooling of the structure) and a system for the control of smoke and heat according	An alternative text is proposed for sections (d) and (e) with the aim of specifying the conditions that must be met by the enclosures of the mezzanines and raised walkways, if available, to ensure the proper functioning of the required protection systems, and by moving the measure of the reduction of evacuation routes provided for in paragraph (e) of this Article to section (d): Where it states 'The adoption of these measures will be applicable only in passageways or mezzanines that are open (without enclosures)', replace with 'The adoption of these measures will be applicable only in mezzanines or raised walkways whose layout allows a rapid dissipation of heat and smoke and the proper functioning of the extinction system. In addition, the length of evacuation routes originating in those areas must not exceed that indicated in Table 2.3.1 of Annex II, and note 4 to that table is not applicable in this	A. The text has been amended and reorganised, as the comment is clearer and more accurate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		to paragraph 8.3 of Annex III. The adoption of these measures will apply only in passageways or mezzanines that are open (without enclosures).'	case.'	
580	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex IV to the RSCIEI, section 2.2 (e) '(e) In all cases (a), (b), (c) and (d), the surface of the crossings or mezzanines is calculated together with that of the fire sector in which they are located and, in addition, the fire protection facilities listed in Annex III should be equipped. In addition, in case (d) the length of evacuation routes originating in those areas must not exceed that indicated in Table 2.3.1 of Annex II, and note 4 to that table is not applicable in this case.'	The alternative text for sections (d) and (e) is proposed by moving the measure of the reduction of evacuation routes provided for in section (e) of this article to section (d): Delete the phrase 'In addition, in case (d), the length of evacuation routes originating in those areas must not exceed that indicated in Table 2.3.1 of Annex II, not applicable in this case note 4 to that table.'	A. The has been amended, moving that sentence to the previous paragraph (in line with the submissions assessed above).
581	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex IV, Areas with Special Conditions Alternatively, it can be referred to in Annex II, Part II, External Spreading, section 2, 'Roofs'	PROPOSAL: In the event that the establishment – whether new or existing – is equipped with photovoltaic facilities for the generation of electrical power on the roof, it must be protected that on the entire surface of the plant, where the insulation used has a Euroclass worse than A2-s1, d0, for a layer that is at least 30.	PA. A section on roof facilities with details on roof has been added to Annex IV. It sets out different requirements depending on the specific case (which need not exactly coincide with the requirements proposed in this submission).
582	AFELMA, Association of Spanish Insulating Mineral Wool Manufacturers	Annex IV, Areas with Special Conditions Alternatively, it can be referred to in Annex II, Part II, External Spreading, section 2, 'Roofs'	Both the construction 'state of the art' and the European (and therefore Spanish) energy policies define the 'roofs of industrial establishments' as a passive subject receiving a large number of photovoltaic installations on the roof (or even on the façade). The inherent risks are already documented in recent studies from different countries (Italy, Germany, GB), with statistics that put in context the magnitude of the problem and the potential for risk. All this information can be found as part of a report made by the APICI association. In addition, we have recently been aware of the results of a doctoral thesis at the University of Edinburgh, carried out by Jens Steeman Kristensen, investigating fire	PA. A section on roof facilities with details on roof has been added to Annex IV. It sets out different requirements, depending on the specific case (which are not exactly the same as those proposed in this submission).

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			safety related to the installation of photovoltaic panels, reached the conclusion among other aspects that there were 29 fires/GW·year, which could lead us to Spain (if the forecasts of the PNIEC are met) to a figure of 3 fires/day in 2030. It is, therefore, a challenge to be addressed. Focusing on the roof, there are no standardised tests to evaluate the behaviour associated with a fire that is covered by the FV plate on its top – with the consequent retention of heat and bounce effect – by the plate. The sole roof test (B_{roof}) does not correctly assess fire behaviour under photovoltaic panels. It is no longer a question of whether or not the source of the fire is the photovoltaic plate, as these installations themselves seem safe. This fire can come from other causes and based on an unknown dynamic have a greater incidence under the panels affecting, and that depending on the composition of this in terms of combustibility, it can affect the interior and even the structure. Therefore, and after it is evident that the test B_{roof} does not identify the behaviour of construction solutions on roofs, and that in the event that the fire load of these solutions may be an uncontrolled risk (beyond the intrinsic risk of the sector on which it is found), we propose the following wording, which is also inspired by phrases already collected in the CTE and in this RSCIEI Project for solutions that do not have tests as a whole. Proposal: *In the event that the establishment – whether new or existing – is equipped with photovoltaic facilities for the generation of electrical power on the roof of the plant, it must ensure that the entire surface of the plant, and with respect to the fire response, will be used with Euroclass A2-s1, d0, or better in its response.* *For the end-use condition of the roof construction system, the B_{roof} test is not considered valid, and those materials that constitute layers contained in the façade solution will be protected by a layer that is at least EI 30.*	
583	CEPREVEN	Annex IV	It is proposed the inclusion in this annex of *zones with particular conditions* of the fire protection measures applicable to photovoltaic systems located on the roofs of buildings	A. A section on roof facilities with details on roof has been added to Annex IV.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			since, currently, the regulatory definition generates the following doubts: If the activity of photovoltaic systems constitutes an industrial activity, since it is a energy-production activity covered by the definition of industry in the Law on Industry, and, therefore, the development of this activity on the roofs would constitute a fire area of type D located on sector A, B or C that corresponds and roof of which should meet the fire resistance requirements required of the delimiting elements of one fire sector with respect to others. If, on the contrary, they can be understood as an element integrated in the roof of the building on which it is located, without constituting an independent fire area, but it is necessary to extend the fire protection measures applicable to the sector on which it is located – something that may be unfeasible or, at least strange (for example, if fire hydrant is intended to be placed on the roof). Or else, if they can be understood as an element integrated into the roof of the building on which it is located, without constituting an independent fire area and without major implications.	
584	IPUR – Association of the Rigid Polyurethane Industry	Annex IV, Areas with Special Conditions Alternatively, it can be referred to in Annex II, Part II, External Spreading, section 2, 'Roofs'	Roof systems with photovoltaic facilities have in most cases organic membranes, including those with A2 insulation. Unfortunately, to this day there is no harmonised test that evaluates photovoltaic panels on roofs. This is why work is under way concerning CEN. On the other hand, no technical evidence is provided to adequately justify the need to exclude insulations with a different Euroclass than A2 based on the horizontal spread of the fire or internal damage. Therefore, the only test available today, CEN/TS 1187, should be used to achieve Broof(t1) according to EN 13501-5.	PA. A section on roof facilities with details on roof has been added to Annex IV. It sets out different requirements depending on the specific case.
585	ASPEC	Annex IV RSCIEI, 3.1. Open spaces occupied by '**supporting enclosure structures formed by textile elements, such as awnings**', will comply with the same conditions as apply to	It should be clearly amended, and indicated that it applies only to textile enclosures installed on both the roof and perimeter enclosures of tents: '3.1 Open spaces occupied by enclosure supporting structures formed by textile elements **on both the roof and**	A. The proposed clarification has been added to the text.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		fire areas (type D layout) in Annexes II and III, taking into account the following particularities:	**perimeter enclosure**, such as tents, will comply with the same conditions as those applicable to fire areas (type D layout) in Annexes II and III, taking into account the following particularities:	
586	particular	Annex IV RSCIEI, Section 3.1(c), in the following text: 'c) For Annex III(8), 'Systems for smoke and heat control', such systems should be available when determined on the basis of the surface and level of risk. Alternatively, in place of these systems, it may be allowed that there are gaps or open areas (permanently open or manually or automatically opened) in the structure that allow the rapid smoke extraction in the event of a fire, it must be justified that the smoke is allowed to evacuate during the first stages of the fire.'	First, the gaps can not be made in the structure, but in the textile enclosures that are supported by the structures. Second, if section 8 of Annex III already determines on the basis of risk and surface area whether systems are to be installed in accordance with Annex I paragraph 13.1 of the RIPCI or whether they can be ventilation gaps according to ratios depending on the activity of the sector and its situation in relation to the building, it is not understood that an alternative of other types of gaps and justifications is proposed without relying on performance design or equivalent safety techniques, which give rise to permissiveness in the installation of corrective measures in the event of fire in this type of structures in relation to metal structures in conventional buildings, in which they are required to have ratios of ventilation and protection not required by fire-based elements of conventional buildings. It should say: *'c) With regard to Annex III(8), 'Systems for smoke and heat control', such systems should be available when determined on the basis of the surface area and level of risk.'*	R. This type of structure (awning) has different characteristics than conventional buildings, and that is why Annex IV has reflected what kind of requirements should apply to them. Certain requirements applicable to buildings (such as certain smoke extraction systems) do not fit the type of solutions that may be feasible for these structures, and this situation has therefore been reflected in the text.
587	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex IV, section 3 3.1 'Open spaces... **taking into account** the following particularities:'	Amend 3.1 'Open spaces... **must furthermore meet** *the following particularities*:'	R. The word 'furthermore' is not appropriate in the sentence quoted. What is sought in that sentence is quoting a number of specific particularities.
588	ASPEC	Annex IV RSCIEI, 3.2. In the case of structures with mixed enclosures, i.e. **'which are made up together of parts with textile enclosures and parts with rigid enclosures (non-textile construction elements)**, in general the provisions of this section will not apply', and the provisions of this	It should be clearly amended and indicated that Article 3.1(a) applies only to textile enclosures **installed on roof** and with rigid-awning **perimeter enclosures**: 3.2. In the case of structures with mixed enclosures, i.e. that are formed together of parts with textile enclosures **on roof and parts with rigid perimeter enclosures (non-textile construction elements), in general the consideration as layout D will not apply except for the application of Article 3.1(a)**,	PA. Section 3.2 has been rewritten to make possible cases clearer.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		section should be classified as type A, B or C layout as appropriate, and comply with the relevant requirements.	to be classified as type A, B or C layout as appropriate, and comply with the requirements applicable to them.	
589	ASPEC	Annex IV RSCIEI, 3.2. **'Only they may be deemed type D layout and benefit from section 3.1 if it is justified that the behaviour of these structures with mixed enclosures can be similar to that of an open space'**, that the requirements applicable to these are adequate and that compliance with the basic safety requirements in the event of fire of Article 6.1 of the Regulation is not adversely affected.	The amendments made to Part 6 of Article 4.2 of the DB-SI 'Safety in the event of fire' of the CTE in Article 3.1 of Annex IV of the RSCIEI **are to be considered for all structures with textile roofs according to that article, regardless of their perimeter enclosure.** 3.1(a) With regard to Annex II, Part 5 ('Structural fire resistance'), the supporting structures of enclosures formed by textile elements will be at least R 30, except where it is demonstrated that the textile element, in addition to being T2 level according to standard UNE-EN 15619 or C-s2,d0 according to UNE-EN 13501-1, has, in all its covering layers, a surface perforation equal to or greater than 20 cm after the test defined in standard UNE-EN 14115.	PA. Section 3.2 has been rewritten to make possible cases clearer.
590	particular	Annex IV RSCIEI, Section 3.2(c), in the following text: '3.2. In the case of structures with mixed enclosures, i.e. that are made up jointly of parts with textile enclosures and parts with rigid enclosures (non-textile construction elements), the provisions of this section generally do not apply, and must be classified as type A, B or C layout as appropriate, and comply with the relevant requirements. They may only be deemed type D layout and benefit from the provisions of section 3.1 if it is justified that the behaviour of such structures with mixed enclosures can be similar to that of an open space, while justifying that the requirements applicable to them are adequate and that compliance with the basic safety requirements in the event of fire in Ar-	This section is also allowing a laxity in the installation of corrective measures in the event of fire in this type of structures in relation to the metal structures of conventional buildings, when this type of construction with mixed enclosures are much more like a building than those that are completely formed by textile elements. In a conventional building, equivalent safety techniques or performance design alternative to the provisions of Annexes II and I of the RSCIEI are requested, while in structures formed with mixed enclosures (textiles and non-textiles) an open justification is allowed. In this way, competition is being impacted in two sectors that offer two solutions for storage, one being more favoured than the other at the level of demand in fire safety. It should say: *'3.2. In the case of structures with mixed enclosures, i.e. that are made up jointly of parts with textile enclosures and parts with rigid enclosures (non-textile construction elements), the provisions of this section generally do not apply, and must be classified as type A, B or C layout as appropriate, and comply with the relevant requirements.* *Only they may be deemed type D layout and benefit from*	R. The equivalent design techniques are open to use at all times, at the discretion of the owner and project executor. However, they are not mentioned in the annexes because the content of the annexes proposes a prescriptive solution to each individual case.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ticle 6.1 of the Regulation is not adversely affected.'	*section1 if it is justified that the behaviour of these structures with mixed enclosures can be similar to that of an open space justifying, in turn,* ***by applying equivalent safety techniques or performance design,*** *that the requirements applicable to these are adequate and that compliance with the basic safety requirements in the event of fire of Article 6.1 of the Regulation is not adversely affected.'*	
591	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Annex IV, section 3 3.2 'In the case of structures with mixed enclosures, that is to say that they are made up jointly of parts with textile enclosures and parts with rigid enclosures (non-textile construction elements), in general...'	Add 3.2 *'In the case of structures with mixed enclosures, i.e. that are formed together of parts with textile enclosures and parts with rigid enclosures (non-textile construction elements),* <u>as well as awnings arranged as extensions of warehouses without intermediate enclosures</u>*, in general...'*	R. It is deemed that there is no need to add further details, because the requirements for each case are already set out in Annex II.
592	CEPREVEN	Annex IV, section 3.2 3.2. In the case of structures with mixed enclosures, i.e. that are made up jointly of parts with textile enclosures and parts with rigid enclosures (non-textile construction elements), the provisions of this section generally do not apply, and must be classified as type A, B or C layout as appropriate, and comply with the relevant requirements.	Adding the following paragraph is recommended: *3.2. In the case of structures with mixed enclosures, i.e. that are made up jointly of parts with textile enclosures and parts with rigid enclosures (non-textile construction elements), the provisions of this section generally do not apply, and must be classified as type A, B or C layout as appropriate, and comply with the relevant requirements.* *The same criterion will apply to portable prefabricated booths, to be classified as type A, B or C as appropriate, and to comply with the requirements applicable to them with the exception of those relating to the load-bearing structure when they are directly supported on the ground floor or on concrete slabs on floors on the ground.*	R. A prefabricated shed is understood to meet the same requirements as any other building, as applied to it by what is set out in Annex I. It is not necessary to clarify that this paragraph does not apply to it.
593	Michelin Spain Portugal, S.A.	Annex 4 AREAS WITH SPECIAL CONDITIONS. 4. Storing specific products. 4.1 Tyres stored outside. a) Dimensions of each stack: i. Maximum height: 3 m.	a) Dimensions of each stack: i. Maximum height: 5 m. Justification: Some tyres have dimensions greater than 4.5 m in diameter, which are stored vertically so that they can be handled conveniently.	PA. The section on tyres has been deleted.
594	Michelin Spain Portugal, S.A.	Annex 4 AREAS WITH SPECIAL CONDITIONS. 4. Storing specific products. 4.1 Tyres stored outside. a) Dimensions of each stack:	a) Dimensions of each stack: ii. Surface area (maximum dimensions): 250 m², if height included between 3 and 5 m. 500 m², if height less than 3 m. Maximum length: 50 m.	PA. The section on tyres has been deleted.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ii. Surface area (maximum dimensions): 20 m long and 6 m wide. b) Minimum stack spacing: 20 m on its long side and 10 m on its wide side.	b) Minimum stack spacing: Distance between stacks by streets of 5 m. Surface areas of 3 000 m² areas 12 m away streets Justification: The state applied the Michelin Group storage in all the countries where it is established, included in the internal benchmarks that comply with NFPA standards and are endorsed by the rules of the insurers. Implementing the measures proposed in the draft would involve multiplying the surfaces and hindering the operation of the supply and disposal of the product, increasing energy consumption and hindering the technical feasibility of application.	
595	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex IV, 4. Storing specific products Section 4.1. Page 113. Tyres stored outside. a) Dimensions of each stack: i. Maximum height: 3 m. ii. Surface area (maximum dimensions): 20 m long and 6 m wide. b) Minimum stack spacing: 20 m on its long side and 10 m on its wide side. c) Minimum distance of the cells to limit the outer perimeter (plot limit), buildings of the establishment itself or other fuel zone: i. If there are no public roads and no combustible materials in any of the perimeter limits: 6 m, from either side. ii. If there are public roads or combustible materials at any perimeter limit: 20 m from the long side and 12 m from the short side.	The requirements indicated for tyre storage do not appear to be consistent with those of Royal Decree 1619/2005 of 30 December on the management of tyres out-of-use. This Royal Decree does not define maximum stack widths/lengths, but rather maximum volumes. Nor distances between stacks. In addition, the height can be 6m if in silos. It is requested that the RSCIEI does not conflict with the external storage requirements of Royal Decree 1619/2005 to avoid discrepancies, or to amend that Royal Decree to homogenise requirements.	A. The section on tyres has been deleted.
596	KREAN S.COOP	Annex IV Part 4 Section 4.1 Tyres stored outdoors For tyres stored in stacks in open	What about tire storage with a diameter greater than 3m? Due to the dimensions being stored on the outside, these	PA. The section on tyres has been deleted.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		spaces, the following considerations will apply: a) Dimensions of each stack: i. Maximum height: 3 m. ii. Surface area (maximum dimensions): 20 m long and 6 m wide.	articles limit this type of storage.	
597	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	RSCIEI ANNEX IV 4.2. Coal stored outside	When the amendment of the regulation was addressed, one of the issues raised was the real impossibility of complying with the regulations on port facilities and basic industries using coal as a raw material. It was proposed to include prescriptions adjusted to the reality of these types of facilities those that have been included not conforming to this reality, and are more restrictive than the direct application of the current regulation, then they do not solve any problem but it increases.	A. The section on coal has been deleted.
598	Subdirectorate-General for Industry, Government of Valencia	Annex IV – ZONES WITH PARTICULAR CONDITIONS 4. Storing specific products 4.3- Cereals, flours, feed and other products comparable to these.	Landfills and recycling plants for organic waste should be included in this section, as fires with characteristics similar to those indicated in this point occur; that is, slow-combustion fires, in which in addition the mechanisms of extinction with water can cause subsequent autoignition by fermentation of the products. It is not necessary to indicate in this section, in addition to the fact that water must not be used in extinction, that other extinguishing elements must be used that limit the entry of oxygen into the product stacks, such as sand.	R. Landfills are not industrial establishments. On the other hand, if it is deemed that the RSCIEI should be applied in recycling plants, the project executor should analyse the specific case in order to see the specific characteristics and the most viable solutions. The articles give several approaches for compliance.
599	Prevention Service of the Directorate-General for Preventing, Extinguishing	Annex IV to the RSCIEI, section 4.3, first paragraph 'Para los almacenamientos de que se indican, se aplicarán las consideraciones siguientes:'	Remove 'de'. Where is has 'Para los almacenamientos de que se indican', replace with 'Para los almacenamientos que se indican'	A. Typo has been corrected.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	Fires and Rescues, Government of Catalonia			
600	STATE AGENCY FOR RAILWAY SAFETY	Annex iv, 4.3.2, (e)	The final point in paragraph 2 is missing.	A. Typo has been corrected.
601	TECNIFUEGO	Annex IV point 4.3.2.e). first paragraph Automatic fire-detection systems (detectors): Detection systems will be available when provided for in Annex III. For this purpose, it is possible to opt for an automatic detection system appropriate to the type of establishment and activity carried out, proposing barrier or suction detection systems.	On the use of barriers or suction, in the special case of storage of cereals, flours, feed and other comparable products, the use of optical barriers or aspiration is mentioned. If the environment is clean, any type of detection (intermittent, barriers, aspiration, thermal cable, flame detection, etc.) can be used, but if it is not, the detection mentioned in the text does not seem to be the most efficient. In these latter cases, the use of thermal detection should be assessed (since the optics in unclean environments will give many false alarms and breakdowns), such as thermal cable or temperature probes, or alternatively flame detectors. In addition, the possible ATEX situation should be taken into account. Proposal: Automatic fire-detection systems (detectors): Detection systems will be available when provided for in Annex III. For this purpose, it is possible to opt for an automatic detection system appropriate to the type of establishment and activity carried out, proposing barrier or aspiration detection systems, although for certain cases such as the storage of flours, feed or other comparable products, the use of thermal cable or temperature probes, or alternatively flame detectors is recommended.	A. The proposed text has been added.
602	General Council of Official Colleges of Industrial Engineers	**ANNEX IV RSCIEI, Section 4, subsection 4.3.2., point (e)**, in the following text: e) Automatic fire detection systems (detectors): Detection systems will be available when provided for in Annex III. For this purpose, it is possible to opt for an automatic detection system appropriate to the type of establishment and activity carried out,	It is proposed to replace this text by extending it by: e) Automatic fire detection (detectors) and temperature measurement systems: Detection systems will be available when provided for in Annex III. For this purpose, it is possible to opt for an automatic detection system appropriate to the type of establishment and activity carried out, proposing barrier or suction detection systems. Alternatively to using of such systems, it may be decided to carry out weekly checks of the internal temperature of the stacks of the material to detect possible internal combus-	R. Fire detection systems are a type of system defined in the RIPCI which, in principle, does not measure temperature (or at least, that is not its official name, nor is that its role). On the proposal to measure humidity, it was deemed that it should be more of a recommendation than an obligation, so it was decided not to include it in the text.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		proposing barrier or suction detection systems. Alternatively to using of such systems, it may be decided to carry out weekly checks of the internal temperature of the stacks of the material to detect possible internal combustions. Temperature probes will be located uniformly throughout the storage area, to ensure representative data are recorded.	tions. Temperature probes will be located uniformly throughout the storage area, to ensure representative data are recorded. In addition, since the moisture content of agricultural products has a definite influence on the risk of spontaneous heating, moisture in the storage of seeds, grains and oily flours should be monitored at least weekly in order to avoid self-combustion. It has to be in an acceptable range that must be justified by a bibliography or specific essays (some authors set it 9 % – 14 %).	
603	particular	ANNEX IV. Delete point 4.3.2 (a)	Point 4.3.2(a) should be deleted, because there is no technical reason to limit the storage of these slow-burning raw materials to 6 000 m² when for logistical reasons they may need more surface area.	R. The regulation in each of its sections always sets maximum areas. If you want to opt for larger surface areas, you can go to the alternative routes considered in the articles, conducting a customised project.
604	particular	ANNEX IV Delete in the wording of point 4.3.2 (b) 'It will be necessary to have at least two doors in each sector'	COMMENT: they are storages that are bulk type, without intermediate corridors or shelves that manage to occupy up to 95 % of the surface of the building and supporting directly on the walls that are load walls. When these buildings are full of materials, the evacuation route is almost zero, since it is impossible to occupy personnel in the storage area. If an *'output is available so that the stored material can be removed in the event of fire'* this is only possible by pedestrian gates. These exits are not viable, because they do not serve as a retaining wall and make the building unfeasible for bulk storage. It is usual that there are sectors for the storage of these raw materials of a small and medium size (500, 1,000, 1,500m²), which do not make sense to oblige having a second outlet when they are completely occupied by the stored materials.	A. The requirement to have two exits has been eliminated.
605	Subdirectorate-General for Industry, Government of Valencia	Annex IV – ZONES WITH PARTICULAR CONDITIONS 4. Storing specific products	Add a special section for establishments manufacturing explosive products and pyrotechnics. 4.4. Manufacturing explosive and pyrotechnic products. In this section, due to the location of the same on non-urbanisable land, it should be considered the existence of perimeter strips in relation to forest land, and the obligation	R. This regulation does not specifically cover such products.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			or not, to adapt these distances to the changes made in the reclassification of the land, after this type of establishment has started up.	
606	SFPE Spain	ANNEX IV 5. Cold-store chambers	5.2 (b) should be added: iii. A smoke-extraction system will be installed so that the fumes from the fire generated within a chamber can be subsequently evacuated.	PA. The section on cold storage is restructured to be more detailed, although the amended text does not fully coincide with the proposal in this comment. The wording has sought to ensure that the requirements put in place are proportionate and appropriate to each individual case.
607	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex IV to the RSCIEI, section 5.1, first paragraph 'This paragraph applies to refrigeration rooms which are integrated within a sector of an industrial building, as an alternative in those cases where one of the following requirements cannot reasonably be applied.'	Where 'subsequent requirements' should be replaced by 'requirements provided for in Annex III'.	A. Typo has been corrected.
608	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex IV to the RSCIEI, section 5.1 (b) 'b) Cold-store chambers which are required by Annex III to a system for the control of smoke and heat and which justify the impossibility of their installation, will apply the following alternative measures: i) automatic detection and fire alarm will be installed in refrigerated enclosures from 100 m^2 surface area, regardless of the level of risk and size of the sector in which they are located. The alarm will also be audible from the outside of the camera. ii) Automatic sprinklers will be installed in refrigerated enclosures from 500 m^2 surface area, regardless of the level of risk and size of the sec-	In order to facilitate the interpretation of this paragraph, the following amendments are proposed: Where it reads 'The cold-store chambers to which according to Annex III' replace with 'Cold-store chambers located in sectors to which pursuant to Annex III' Where it says 'The sprinklers should cover both the chamber and the sector.' replace with 'The sprinklers must cover both the inside of the chamber and the sector in which they are framed.' Add sub-section iii): 'iii) A smoke and heat control system covering the sector in which the chamber is located (outside it) must be installed in accordance with section 8 of Annex III.'	A. Amendments to the text have been added. In this case, two cases can be distinguished: that the chambers partially occupy a sector, or that they fully occupy it.

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		tor in which they fall. Sprinklers should cover both the chamber and the sector. The type of sprinklers to be used should be appropriate so that they can operate at the temperature of the cold-store chamber. Alternatively to installing automatic sprinklers, the installation of an inertisation system inside the chamber, designed according to standard UNE-EN 16750, will also be allowed. iii) a smoke and heat control system covering the sector in which the chamber is located (outside it) must be installed in accordance with section 8 of Annex III.'		
609	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Annex IV to the RSCIEI, section 5.1(a) and (b)	It is proposed to add a third section (c) to specify how cameras integrated in sectors requiring a fixed automatic extinguishing system should be protected, in accordance with section 7 of Annex III to the Regulation: 'c) Refrigeration rooms located in sectors which are required by Annex III to a fixed automatic extinguishing system will cover both the interior of the chamber and the sector in which they are located. The type of system to be used should be appropriate so that it can operate at the temperature of the cold-store chamber. Alternatively, the installation of an inertisation system inside the chamber, designed according to standard UNE-EN 16750, will be permitted.'	A. The proposed text has been added.
610	Catalonia Safety Cluster Against Fires (CLÚSIC)	**Annex IV. Section 5.2, Heading b**. **Page 116** In the following text: b) Cold-store chambers which are required by Annex III for a smoke and heat control system and which justify the impossibility of their installation will apply the following alternative measures: i. Automatic detection and fire alarm	The major problem for cold-store chambers is the closed spaces within fire sectors that because of their size may require the installation of a SCTEH, but that can be difficult to implement in relation to the volume of the camera. In any event, the existence of a detection system and sprinklers will not prevent the generation and accumulation of smoke inside the chamber, which also due to the low temperatures inside it and the thermal inertia of it due to the low temperatures of the stored materials, and the enclosures and structure of the chamber itself, will produce a cooling and de-	PA. The section on cold storage is restructured to be more detailed, although the amended text does not fully coincide with the proposal in this comment. The wording has sought to ensure that the requirements put in place are proportionate and appropriate to each individual case.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		will be installed in refrigerated enclosures from 100 m^2 surface area, regardless of the level of risk and size of the sector in which they are located. The alarm will also be audible from the outside of the camera. ii. Automatic sprinklers will be installed in refrigerated enclosures from 500 m^2 surface area, regardless of the level of risk and size of the sector in which they are located. Sprinklers should cover both the chamber and the sector. The type of sprinklers to be used should be appropriate so that they can operate at the temperature of the cold-store chamber. Alternatively to installing automatic sprinklers, the installation of an inertisation system in the chamber, designed according to standard UNE-EN 16750, will also be supported.	stratification of the fumes. Therefore, it will always be necessary to perform at least one smoke extraction since it is a confined space and with fumes inside with low temperature and therefore little buoyancy. For determining ventilation ratios, reference was made to the requirement of 12 renewals per hour of French IT 246, equating that ratio to the most critical of the natural ventilation ratios required in section 8.4 of the RSCIEI and determined the ratios for the other two cases proportionally. **PROPOSAL:** Replace with the following text: *'b) Cold-store chambers which, due to the size and risk conditions of the sector in which it is located, would require a system for the control of smoke and heat in accordance with section 8.2 of Annex III, but whose interior surfaces are smaller than those indicated therein, may dispense with the installation of a smoke and heat control system in accordance with section 8.3 of Annex III, provided that they have the following alternative measures.* *i. Automatic detection and fire alarm will be installed in refrigerated enclosures from 100 m^2 surface area, regardless of the level of risk and size of the sector in which they are located. The alarm will also be audible from the outside of the camera.* *ii. Automatic sprinklers will be installed in refrigerated enclosures from 500 m^2 surface area, regardless of the level of risk and size of the sector in which they are located. Sprinklers should cover both the chamber and the sector. The type of sprinklers to be used should be appropriate so that they can operate at the temperature of the cold-store chamber. Alternatively to installing automatic sprinklers, the installation of an inertisation system in the chamber, designed according to standard UNE-EN 16750, will also be supported.* In addition, it is necessary to add the following paragraph to be able to have at least one system that allows fumes to be extracted from the inside of the chamber, which will inevitably occur and affect above all the access of firefighters	

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			and can affect the evacuation. *iii. A smoke extraction system will be installed in accordance with paragraph 13.1.d) of the RIPCI, dimensioned for a recommended capacity equivalent to between 2 and 10 renewals/hour.* *Extractors must have a F400120 rating and must be activated automatically through the detection system, with the additional possibility of manual activation and shut down by the extinguishing services from an easily accessible and locatable control post. If ducts are used for the extraction of smoke or for the supply of air that are immersed in the fire sector, they must be rated E60060 if they run through a single sector, or EI 120 if they pass through fire compartmentalising elements.* *The air supply will be carried out naturally, unless the location of the sector prevents it, in which case it will be carried out mechanically in the lower part of the sector at a proportion of 80 % of the flow required for the smoke outlet and with only manual activation by the Extinction Services from an easily accessible and locatable control post.*	
611	Catalonia Safety Cluster Against Fires (CLÚSIC)	Annex IV, 5. Cold-store rooms. Section 5.2 b.ii. Alternatively to installing automatic sprinklers, the installation of an inertisation system in the chamber, designed according to standard UNE-EN 16750, will also be supported.	These systems are outside the RIPCI and the alteration that this RD proposes for him. If they are to be accepted, they should be included in the amendment of the RIPCI and Annex III, so that these systems are placed on the market, installed and maintained correctly. If it is accepted for sold-store chambers, why is it not accepted for other types of establishments? PROPOSAL: Include these systems in the RIPCI, in Annex III and allow their use to other establishments	R. Given its very specific and uncommon use, it is opted for the moment not to include it in the RIPCI as its own system. The current wording is sufficient.
612	TECNIFUEGO	Annex IV. Section 5.2.(b) b) Cold-store chambers requiring a smoke and heat control system under Annex III and justifying the impossibility of their installation will apply the following alternative measures:	Replace the first paragraph with the following text, since the major problem for cold-store chambers is the closed spaces within fire sectors that, due to their size, may require the installation of a SCTEH, but that can be difficult to implement in relation to the volume of the chamber. *b) Cold-store chambers which, due to the size and risk conditions of the sector in which it is located, would require a system for the control of smoke and heat in accordance with*	PA. The section on cold storage is restructured to be more detailed, although the amended text does not fully coincide with the proposal in this comment. The wording has sought to ensure that the requirements put in place are proportionate and appropriate to each individual case.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		i. Automatic detection and fire alarm will be installed in refrigerated enclosures from 100 m² of surface area, regardless of the level of risk and size of the sector in which they are located. The alarm will also be audible from the outside of the camera. ii. Automatic sprinklers will be installed in refrigerated enclosures from 500 m^2 surface area, regardless of the level of risk and size of the sector in which they are located. Sprinklers should cover both the chamber and the sector. The type of sprinklers to be used should be appropriate so that they can operate at the temperature of the cold-store chamber. Alternatively to installing automatic sprinklers, the installation of an inertisation system in the chamber, designed according to standard UNE-EN 16750, will also be supported.	*section 8.2 of Annex III, but whose interior surfaces are smaller than those indicated therein, may dispense with the installation of a smoke and heat control system in accordance with section 8.3 of Annex III, provided that they have the following alternative measures.* *i. Automatic detection and fire alarm will be installed in refrigerated enclosures from 100 m^2 surface area, regardless of the level of risk and size of the sector in which they are located. The alarm will also be audible from the outside of the camera.* *ii. Automatic sprinklers will be installed in refrigerated enclosures from 500 m^2 surface area, regardless of the level of risk and size of the sector in which they are located. Sprinklers should cover both the chamber and the sector. The type of sprinklers to be used should be appropriate so that they can operate at the temperature of the cold-store chamber. Alternatively to installing automatic sprinklers, the installation of an inertisation system in the chamber, designed according to standard UNE-EN 16750, will also be supported.* *In addition, it is necessary to add the following paragraph to be able to have at least one system that allows fumes to be extracted from the inside of the chamber, which will inevitably occur and affect above all the access of firefighters and can affect the evacuation.* *iii. A smoke extraction system will be installed with the following characteristics:* *It will be sized for an extraction flow equivalent to:* *– 6 renewals per hour of the volume of the chamber in manufacturing activities and other similar processes located in any plant above ground level.* *– 9 renovations per hour of the volume of the chamber, in manufacturing activities and other similar processes located on the ground floor, and also in fire sectors with storage activities located in any plant above ground level.* *– 12 renovations per hour of the volume of the chamber, in storage activities located on the ground floor.* *Extractors must have a $F_{400}120$ rating and must be activated automatically through the detection system, with the addi-*	

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			tional possibility of manual activation and shutdown by extinguishing services from an easily accessible and locatable control post. If ducts are used for the extraction of smoke or for the supply of air that are immersed in the fire sector, they must be rated $E_{600}60$ if they run through a single sector, or EI 120 if they pass through fire compartmentalising elements. *The air supply will be carried out naturally, unless the location of the sector prevents it, in which case it will be carried out mechanically in the lower part of the sector at a proportion of 80 % of the flow required for the smoke outlet and with only manual activation by the Extinction Services from an easily accessible and locatable control post.*	
613	CEPREVEN	Annex IV	It is proposed the inclusion in this annex of landfill cells (landfill cells), where the application of the RSCIEI is technically unfeasible, as we have already argued extensively at the public consultation stage. Therefore, we propose the inclusion in this annex, as an alternative, of fire protection measures aligned with those provided for by the specific sectoral regulations, in particular, by the *Royal Decree 646/2020, of 7 July, regulating the disposal of waste by landfilling*.	R. Landfills are not industrial establishments. On the other hand, if there is already specific legislation, it makes no sense to add these to it.
614	particular	ANNEX IV RSCIEI. Other	Chemical (or analogous) production plants, based on open exterior structures, usually with several levels do not fit into any of the available characterisations. They are usually assimilated to type D layout, but the fitting is not good. It is a very common type of layout, with many casuistry, that will remain unregulated and that will lead to all kinds of conflicts of interpretation. Similarly, storage-tank parks in fixed tanks, when they are not covered by the RAPQ, will also be deregulated.	R. The annexes to this regulation focus on specifying generic solutions. The solutions of such particular cases usually fall into specific regulations, or in their absence, for particular cases the articles also establish a way to make custom designs. (In the regulation, where they fit best is as type D layout, as stated in the submission.)
615	Eurisko Consulting	Annex IV. Areas with particular conditions	It is understood that much of the changes of the RSCIEI are motivated to accommodate the new modern logistic warehouses, with larger sector sizes and extended evacuation routes, which are mostly being processed *through equivalent safety techniques*. We agree that the new regulations to be adopted make it possible to address the safety of these establishments. with-	R. The draft proposed regulation may apply to all types of establishments, including those mentioned in this comment. No different requirements or other annexes addressing this issue are required.

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			out resorting to a financial approach that has high costs, deadlines and uncertainties. The particularity of modern logistic warehouses could be addressed directly in a new annex for RSCIEI 2004, with similar characteristics to this Annex IV, and thus not to reduce the level of protection of other types of industries. Note that, in order to justify extended evacuation routes and larger sector sizes, among other aspects, in the *equivalent safety studies* it has been necessary to provide additional security measures, which with the publication of the new RSCIEI will no longer be necessary. Some of the main measures that have been used in this type of study are summarised below: – As the first safety aspect lost in the event of fire is the visibility of evacuation routes and exits, it is possible to maintain safety conditions during evacuation for a longer time by providing signalling improvements, such as by using electroluminescent signalling of evacuation outlets. – The risks of external spreading of type B industrial units (even adjacent) are lower than those of TYPE C industrial units that do not have fire-resistant (or at least non-combustible) enclosures, and yet the requirements of TYPE B industrial units are more severe. They should have the same requirements, establishing in a common way what type of protection the façade should have according to the separation between the buildings, along the lines of other European countries. – UNE 23585 smoke control systems are expensive and unsafe in case of manual activation when all smoke tanks are flooded, because air enters directly into the smoke layer, worsening conditions. A more coherent solution could be similar to that of the German industrial regulation, which calls for providing a roof vent and low-level air intake through the usual openings of the warehouses. A large majority of the equivalent safety studies that are approved in Spain show that with less than 2% of the geometric surface of the ventilation roof, without using smokescreens, it is sufficient to exceed the performance of the UNE 23585.	

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			By providing these measures, in logistic warehouses protected with sprinklers suitable for the risk to be protected (the ESFR sprinklers are not valid for everything), larger sector sizes and evacuation routes of up to 90 m could be available without impairing the level of safety and without having to process 90 % of the *equivalent safety studies* that are currently presented.	
616	European Fire Sprinkler Network	Regulatory Body List of UNE and other internationally recognised standards	Only UNE standards are indicated The internationally recognised ones should be included or removed from the title of the table. Proposal for amendment: Includes RUNE-prEN 12259-13 ESFR sprinklers on the table Include as internationally recognised CEA 4001, FM Global Data Sheets, VMS CEA 4001.	R. The list of rules of the RSCIEI refers only to the rules explicitly set out in the text of the regulation. Citing other references is not appropriate. For its part, product standards are cited in the European product regulations for their CE marking (CER), which prevails over national legislation, and in cases where there is no such legislation, these can be cited in the RIPCI when it considers it necessary to regulate such products. On the other hand, the final list should not mention rules that are still in the project stage (Pr-)
617	APICI	Regulatory Body List of UNE and other internationally recognised standards	It is proposed: Include reference to RUNE-prEN 12845	R. The RIPCI and its list already cite the current version of this standard: UNE-EN 12845:2016/A1:2021 In the RSCIEI it is not explicitly mentioned because for this equipment, reference is made to the RIPCI and to what is indicated in it. There is no point in quoting the same standard in the lists of two regulations. On the other hand, the final list should not mention rules that are still in the project stage (Pr-)
618	KREAN S.COOP	ANNEX V LIST OF UNE AND OTHER INTERNATIONALLY RECOGNISED AND STANDARDS	There is not a single mention of other internationally recognised standards. Include:	R. The list of rules mentions only the rules explicitly contained in the text of the regulation. Citing other references is not appropriate.
619	SFPE Spain	ANNEX V	All the regulations in the annexes are Spanish regulations.	R. The list of rules mentions only the

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		LIST OF UNE AND OTHER INTERNATIONALLY RECOGNISED AND STANDARDS	There is no other internationally recognised standard. Internationally recognised standards should be added, in particular: Standards National Fire Protection Association, NFPA 101 Life Safety Code, Quinsy: National Fire Protection Association, 2021. 2021 International Building Code (International Code Council Series) NFPA 13 Standard for the Installation of Sprinkler Systems NFPA 92 Standard for Smoke Control Systems Guides Society of Fire Protection Engineers, SFPE Engineering Guide to Performance-Based Design Fire Protection, New York: Springer, 2007. Society of Fire Protection Engineers, SFPE Handbook of Fire Protection Engineering, New York: Sprinkler-Overlay, 2016. British Standards Institution, 'PD 7974-6:2019 Application of fire safety engineering principles to the design of buildings. Part 6: Human factors: Life safety strategies – Occupant evacuation, behaviour and condition (Sub-system 6),' BSI Standards Limited, London, 2019.	rules explicitly contained in the text of the regulation. Citing other references is not appropriate.
620	SFPE Spain	*Annex V, List of UNE and other internationally recognised standards*	It should be considered to add more international standards and guidelines of recognised prestige. The examples listed below are internationally recognised standards and guides and are used (directly or indirectly) in most global fire safety studies. For example. SFPE Standards and Guidelines, Society of Fire Protection Engineers (SFPE Standards and Guidelines) NFPA Standards, National Fire Protection Association (NFPA Standards) New Zealand Building Code (C – Protection from Fire) England standards related to fire safety (British Standards, Fire Related) In addition, it should be added that scientific studies and articles containing the latest technical/scientific developments	R. The list of rules mentions only the rules explicitly contained in the text of the regulation. Citing other references is not appropriate.

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			in relation to fire safety can be used.	
621	GENERAL COUNCIL OF THE TECHNICAL ARCHITECTURE OF SPAIN, CGATE	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.	It still avoids regulating passive protection products and systems	C. The submission is a comment that does not include specific proposals. In any event, the RIPCI currently regulates active protection. Passive protection is provided for in its applicable law (e.g. RSCIEI), and it is understood that this way of functioning is appropriate. No changes are necessary.
622	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. One. In Article 5, 'Accreditation of compliance with the safety requirements of fire protection products', the following new sections 5 and 6 have been added: 6. With regard to [...]. In addition, an independent third-party report must be attached to the project, issued by a supervisory body authorised for these tasks in accordance with Royal Decree 2200/1995 of 28 December, which positively validates the effectiveness and adequacy of these technical solutions.'	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. One. In Article 5, 'Accreditation... In line with the proposed amendment to Article 10(3), it is proposed that the following text be deleted: 6. With regard to [...]. ~~In addition, an independent third-party report must be attached to the project, issued by a supervisory body authorised for these tasks in accordance with Royal Decree 2200/1995 of 28 December, which positively validates the effectiveness and adequacy of these technical solutions.~~'	R. The independent third-party report is deemed necessary to ensure the adequacy of the chosen solutions in cases where this route is chosen. In the case of not wanting to use this route, the project executor can apply the general requirements of the regulation, which should always be the preferred route of compliance.
623	ITEC – Catalonia Institute of Construction Technology	Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.* With regard to new points 5 and 6 proposed to be added to Article 5, 'Accreditation of compliance with the	The distinction made in the text of the new section 5 between requirements relating to products and requirements relating to the design of facilities (such as two independent and unrelated realities) and the consequent approach to justifying those requirements resulting from that distinction should, in our view, be qualified, for the following reasons: The products are necessarily associated with an intended	R. It should be remembered that they are different things: products and their certification (e.g.: CE marking of product) with the design of a complex system/installation consisting of several components (products) and which are designed and installed following other requirements that go beyond the mere

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		safety requirements of fire protection products' of the RIPCI: "5. The requirements set out in Annex I to the Regulation, which are not related to products but address aspects relating to the design of facilities, must justify compliance with what is indicated therein by means of their respective projects, technical documentation and certificates of the installation undertaking. 6. With regard to compliance with the design requirements referred to in section 5 above, the use of alternative technical solutions to those referred to in the UNE, EN, ISO standards referred to in Annex I will be permitted provided that the minimum requirements set out in the text of that Annex and in the other applicable specific regulations are met. The application of these alternative solutions will be carried out under the responsibility of the project executor and subject to the agreement of the operator, justifying documentary evidence that the solutions adopted have a level of safety, at least equivalent to that obtained by the application of the applicable requirements. In addition, an independent third-party report must be attached to the project, issued by a supervisory body authorised for these tasks in accordance with Royal Decree 2200/1995 of 28 December, which positively validates the effec-	use (and to conditions and limits of use for which they are assessed according to their product reference standards). In certain cases, it may therefore happen that deviations in the design criteria of a given installation from the requirements, criteria and standard conditions contained, for example, in design standards cited in the Regulation, and deviations from the conditions of use for which the products forming such installation are evaluated, entail the need for an additional evaluation of the product under such alternative conditions of use. We therefore understand that the need to re-evaluate a product according to the alternative design conditions should be open – and explicitly mentioned – in the text of the new RSCIEI, when it is deemed that the available evaluation of the product does not cover those conditions of use that increase the risk. Such a reassessment could be resolved by means of a technical assessment of suitability, in accordance with Article 5(3) of the RIPCI.	certification of the product separately. With regard to Article 5.5, what is cited in it is the usual way of working already contained in other articles of the current RIPCI, and the reason for including the new text is only to serve as an explanation for the text of Article 5.6. The suitability assessments in Article 5.3 are different from what is mentioned in Article 5.6 and respond to different needs. One talks about products (and therefore something similar to a product certification, although this may become as complex as you want); and the other one discusses the design of the facilities. Therefore, the paths to be followed in each case have different particularities. A new Article 5.6 has therefore been introduced which sets out how alternative technical solutions can be resolved.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		tiveness and adequacy of these technical solutions.'		
624	particular	RIPCI two. Article 6 'a project signed by a qualified expert will be made available prior to the commissioning of the equipment or system'	Do you consider yourself a qualified expert to a TECHNICAL ARCHITECT? Could a list of enabling qualifications be drawn up in the interpreting guide?	C. The submission is a comment that does not include specific proposals. The Regulation does not define specific qualifications.
625	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	Fifth final provision, POINT TWO, amendment of Article 6 of the IPCR	'Together with the project, an independent third-party report must be attached, issued by a supervisory body authorised for those tasks in accordance with Royal Decree 2200/1995 of 28 December, which positively validates the effectiveness and adequacy of those characteristics.' Adaptation to what? One of the problems RIPCI has is that it doesn't really incorporate requirements. Against which technical document would you assess compliance and supervisory body?	C. The submission is a comment that does not include specific proposals. In response to the comment, it should be noted that the report must be validated by an independent entity that meets the requirements set out in that section.
626	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Two. Article 6 has been edited as follows: "The trade mark will not be necessary... Along with the project, an independent third-party report must be attached, issued by a supervisory body authorised for these tasks in accordance with Royal Decree 2200/1995, of 28 December, which positively validates the effectiveness and adequacy of these characteristics.'	Two. Article 6 has been edited as follows: It is proposed that the following text be deleted: "The trade mark will not be necessary... ~~Along with the project, an independent third-party report must be attached, issued by a supervisory body authorised for these tasks in accordance with Royal Decree 2200/1995, of 28 December, which positively validates the effectiveness and adequacy of these characteristics.~~' JUSTIFICATION The same one was argued in the previous proposal on the Second Transitional Provision.	R. The independent third-party report is deemed necessary to ensure the adequacy of the chosen solutions in cases where this route is chosen. In the case of not wanting to use this route, the project executor can apply the general requirements of the regulation, which should always be the preferred route of compliance.
627	General Secretariat for Industry and Mines, Government of Andalucía	Fifth Final Provision, Two. Article 6 RIPCI	Consideration should also be given to applying, for single models, equivalent safety in the same terms as in the new Article 5.6 RIPCI.	R. The new wording of this article as it stands now already includes this type of casuistry. No changes are necessary.
628	INDUSTRY	Fifth final provision, POINT THREE,	'The hydrants located on the public road of municipal prop-	A. The text is restructured, and moved

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	amendment of Article 9.2 of the IPCR	erty, in which case their requirements for installation, commissioning, maintenance, inspections, etc. will be those fixed by the municipality or competent public administration' Section 9 of the RIPCI is entitled 'Scope of action of installation companies'. It is not a good legislative practice to exempt municipal hydrants from a number of issues under a heading that is regulating other issues. It is deemed very important to know whether such facilities are exempt from any regulatory verification of those laid down in the regulation but should be indicated in Article or point specifically established for this purpose.	to the section on hydrants in Annex I.
629	Spanish Association of Water Supply and Sanitation	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Section three, in the following text: *'Article 9(2) will read as follows: 2. Except for the provisions of the previous section: (...) d) The hydrants located on the municipally owned public road, in which case their requirements for installation, commissioning, maintenance, inspections, etc. They will be those determined by the competent municipality or public administration.';*	Proposal for amendment: *'Article 9(2) will read as follows: 2. Except for the provisions of the previous section: (...) d) The hydrants located on the public ~~owned municipally~~, in which case their installation requirements (location, distances to façades and curbs, buried type or surface, model and characteristics), ~~commissioned~~, its maintenance plan and the periodicity of it, ~~inspections, etc.~~, will be those fixed by the municipality or competent public administration, on proposal, where appropriate, of the managing body of the water supply service'.* This proposal for amendment is introduced in order to exclude from the scope of application all hydrants located on public roads, as well as to reflect the requirements that are required in practice for this type of fire protection facilities, and which will be set by the competent administration, but which should have the considerations of the managing body of the water supply service, in cases where these entities are responsible for the installation or maintenance of this type of hydrants.	R. The current wording is clearer to understand and precise than the proposal of the submission, so it is opted not to change the text in this regard. On the other hand, it should be noted that this paragraph has moved to Annex I in response to another submission.
630	Naturgy Renovables SLU	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Three. Article 9(2) will read as follows: "2. Except for the provisions of the	It is not clear whether **the maintenance** associated with the mobile extinguishers and photo luminescent signalling within each wind turbine, are covered by the operations indicated in Annex II of Royal Decree 513/2017, with the periodicities indicated therein, or they take advantage of the periodicities and operations collected by the manufacturer of each wind turbine, since this may not include the periodical	PA. A comment has been added to clarify the minimum maintenance of extinguishers in these situations. All other cases are deemed to be covered by the existing wording.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		previous section: e) Fire protection systems that are part of machines such as wind turbines, covered by Royal Decree 1644/2008, of 10 October, establishing the standards for the marketing and commissioning of machines, by which, they must be designed and manufactured in such a way as to avoid any risk of fire or overheating. Due to the above, the fire protection systems of these machines fall within their conformity assessment and CE marking as a machine, under the responsibility of the manufacturer, and the conditions of installation, commissioning and **maintenance** are also established there."	re-trigger of the mobile extinguishers or the periodical review of the photo luminescent signalling, understanding as fire protection systems, the facilities associated with the detection/extinction of fires, which could be considered by a different fire extinguisher to be a fire extinguisher and the fire extinguisher could be used as fire protection systems.	
631	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Three. Point (d) of Article 9(2) indicates d) The hydrants located on the municipally owned public road, in which case their requirements for installation, commissioning, maintenance, inspections, etc. They will be those established by the competent municipality or public administration.	It is proposed to amend: 'The hydrants located on the public road of municipal property, in which case their requirements for installation, commissioning, maintenance, inspections, etc. will be those fixed by the municipality or competent public administration.' Replace by: (d) The hydrants located on the public road of municipal property, in which case their installation requirements, and commissioning, will be those fixed by the competent municipality or public administration. Maintenance work and inspections of the equipment must be carried out in accordance with the provisions of Table II of the Regulation, with regard to maintenance per qualified company. **Justification:** What we understand is that if the municipalities or competent public administration decide NOT to carry out maintenance are exempt, we consider that it is a step backwards in the safety of citizens, given the importance it has for the fire department that are in perfect working con-	R. Requiring the maintenance of such equipment as set out in Annex II could be disproportionate, given the large number of units that may exist in a city. That is why it is important that the municipality can analyse its specific case and establish a tailor-made plan on these aspects.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			dition and can fill the trucks to carry out their work.	
632	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Three. Article 9(2)(e)(e) e) Fire protection systems that are part of machines such as wind turbines, covered by Royal Decree 1644/2008, of 10 October, establishing the standards for the marketing and commissioning of machines, by which, they must be designed and manufactured in such a way as to avoid any risk of fire or overheating. Due to the above, the fire protection systems of these machines fall within their conformity assessment and CE marking as a machine, under the responsibility of the manufacturer, and the conditions of installation, commissioning and maintenance are also established there.'	It is proposed to amend: 'under the responsibility of the manufacturer, the conditions of installation, commissioning and maintenance are also established there.' Replace with: 'under the responsibility of the manufacturer, the installation, commissioning and maintenance requirements laid down in this Regulation are fulfilled.' **Justification:** Within the conditions that may be established by the manufacturer, at least those required by the regulations applicable to each equipment or system made by companies qualified for each operation should appear.	PA. A comment has been added to clarify the minimum maintenance of extinguishers in these situations. The rest of the text remains as it is. It should be noted that the general installation and commissioning requirements set by the RIPCI are not intended for this casuistry, and it is the equipment manufacturer who must address these issues in compliance with the applicable legislation of the product as a whole (the Machinery Directive). Regarding maintenance, this equipment may have specific considerations which the RIPCI does not contemplate.
633	General Secretariat for Industry and Mines, Government of Andalucía	Fifth Final Provision, Three. Article 9. 2 RIPCI	We consider it appropriate to maintain the possibility that such equipment can also be placed by the manufacturer, thus increasing the options for the user.	R. We understand that in the manufacturer it is always installer, this figure being already contemplated.
634	General Secretariat for Industry and Mines, Government of Andalucía	Fifth Final Provision, Three. Article 9. 2.e) of the RIPCI	Assess the appropriateness of extending this heading to all products covered by harmonised Community legislation covering the risk of fire.	R. Community legislation normally regulates products, not facilities. The only case in which it makes sense to apply what is said in paragraph (e) is in the situations already mentioned in it.
635	Superior Council of the Colleges of Architects of Spain	Fifth Final Provision, which refers to the Amendment of Regulation of Fire Protection Facilities, approved by Royal Decree 513/2017 of 22 May	a) in section Three, which refers to Article 9(2) of that Royal Decree, and concerning exceptions to the scope of action of installation companies, we believe that the case of single-family dwellings in buildings of collective housing should be extended. Thus, it says 'The extinguishers, which must be	R. Regarding the first part of the proposal, it is not necessary to make changes, since in multi-family homes the extinguishers are placed in the common area. With regard to the second com-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			placed by installation companies of fire protection systems or by companies maintaining fire extinguishers. Where the area of the establishment is not more than 100 m² or it is a single-family home, it may also be placed by the user', it should say 'The extinguishers, which must be placed by installation companies of fire protection systems or by companies maintaining fire extinguishers. Where the area of the establishment is not more than 100 m² or is a single-family home, or the interior of a single dwelling in a multi-family residential building, it may also be placed by the user.' b) In section 27, which refers to paragraph 2(c) of Annex III to that Royal Decree, and on minimum human means in companies installing and maintaining fire protection equipment and systems, we believe that it should not be modified. The Ministry proposes that where it reads '1:9 Have a university degree the curriculum of which covers the subjects covered by this Regulation, for which it accredits its qualification', after amendment, read '1' Having a university degree whose field of competence, legal attributions to the curriculum covers the subjects covered by this Rule, for which it accredits its qualification.	ment to the submission, it is understood that the current wording is correct and does not require changes.
636	CONAIF (National Confederation of Fitter and Fluid Associations)	**Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.** **Five. In Article 20, 'Commissioning', the following new section 2 has been added:** '2. It is not necessary to commissioned facilities consisting solely of the equipment referred to in Article 9(2).'	Five. In Article 20, 'Commissioning', the following new section 2 has been added: *'2. For the commissioning of facilities consisting solely of the equipment referred to in Article 9.2, a technical report prepared by the qualified operator of the qualified installation undertaking will be drawn up and the corresponding maintenance contract will be signed.* *Facilities with only flame retardant blankets will be governed by the maintenance operations indicated by the manufacturer of such blankets. The evacuation plans will be subjected to maintenance operations similar to the signalling systems verifying their general condition.* *It is not necessary to draw up the technical report where the elements are installed by the user himself or the systems integrated into machines covered by Royal Decree 1644/2008.'*	R. The commissioning section contains nothing about maintenance because the latter is already regulated in its own section. On the other hand, it is not intended to modify the wording as regards the documentation applicable to the commissioning or who carries it out.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			From CONAIF, we understand that all facilities within the scope of the RIPCI must be accompanied by their technical documentation. We believe that for systems installed by the user, it would not be necessary the technical documentation, however, we consider it essential that there are maintenance contracts that ensure the perfect usability of these equipment in emergency situations. We also understand that the qualified operator has sufficient technical capacity to prepare the technical documentation assimilated to technical report.	
637	Spanish Association of Water Supply and Sanitation	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Section 5, in the following text: *'Five. In Article 20, 'Commissioning', the following new section 2 has been added: "2. The commissioning of facilities consisting solely of the equipment referred to in Article 9(2) will not be necessary."'*	Proposal for amendment: *"Five. In Article 20, 'Commissioning', the following new section 2 has been added:* *"2. It is not necessary to commissioned facilities consisting solely of the equipment referred to in Articles 9.2. and 14(3).'* This proposal for amendment is introduced in order to also include the exception of hydrants located on public roads, which is also proposed to be reflected in Article 14(3), concerning the scope of action of maintenance companies, for commissioning as well as for maintenance and conservation, since Article 22.2 refers to 20.2.	R. There is no need to make this clarification, as it is already explicitly stated in Article 9.
638	General Secretariat for Industry and Mines, Government of Andalucía	Fifth Final Provision, Five. Article 20.2 RIPCI	We believe it is more appropriate to refer to the fact that it will not be necessary to '**communicate** the commissioning'.	R. The proposal of the comment would raise doubts as to which parts of the article should be complied with and which parts of the article should not be complied with (e.g. whether everything that is required for commissioning except communication should be carried out). From the initial wording, it is clear that it does not apply any part of the article.
639	FEDAOC	DF5 RIPCI, point 6, inspections	This point should mention directly the equipment covered (fire extinguishers and flame retardant blankets), not to refer to point 20.2, which in turn refers to point 9.2. It is a mis-	R. It is preferred to make the reference so that it is clearer what the linkage is and the cause of what it says there. On

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			take to eliminate the need to carry out inspection by CB to establishments that only have extinguishers, which are usually old facilities with no passive protection and can be establishments with a very high fire risk that have not been adapted to the RSCIEI. Remember also that such an inspection brings to light other related problems in this type of establishment, such as surface extensions after 2004 that have not been communicated, active protection systems that have not been properly commissioned, in addition to checking the correct work of the maintenance company, the correct condition of the luminescent signalling system and emergency lighting. It is not just about checking the extinguishers.	the other hand, it should be recalled that the amendment introduced will not imply a major change from the current situation, but rather a clarification that will complement the exceptions that already exist in the current RIPCI (Article 22(2)). It should also be recalled that in RIPCI inspections, the passive protection part is not inspected because the RIPCI does not cover those requirements.
640	FEDAOC	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.	We detected the absence of standard UNE 192005-2 of the procedure for regulatory inspection, to homogenise the procedures of all CBs, as amended in other regulations of recent publication such as the regulation of refrigeration plants, in its amendment six of this document.	A. Reference to the UNE standard has been added in the article on inspections.
641	NEDGIA SA	Amendments to RD 513/2017 -RIPCI Six. In Article 22(2) on periodic inspections of buildings, the following paragraph has been added at the end of the current text: Such inspections will also not be mandatory for those places whose facilities consist solely of the equipment referred to in Article 20(2) or of the Emergency Lighting System, unless their specific regulations so require.	We believe that the new paragraph should also apply to facilities affected by Article 22.1 when they have only the equipment indicated in the new text. It is a unfair treatment. It is suggested that this paragraph should become a new Article 22.3.	R. In cases where this aspect is addressed in the specific regulation, that is where it is said in which cases it applies and what things should be inspected (which in many cases can be more things than those related to FP, the part of FP being only one more aspect to be inspected).
642	INDUSTRY SERVICE OF THE GENERAL DIRECTORATE OF INDUSTRY, PRINCIPALITY OF ASTURIAS	Fifth Final Provision, POINT SIX (possible typo)	'These inspections will not be mandatory for those places whose facilities consist solely of the equipment referred to in Article 20.2 or emergency lighting systems, unless their specific regulations so require.' It is understood that instead of 20.2 it is 9.2	R. There is no mistake. The proposed Article 20(2) addresses the equipment of Article 9.2, so it does not imply any change to cite one or the other. On the other hand, it is understood that by referring to Article 20(2) which refers to commissioning, it is clearer the reason for the exclusion of Article 22.2.

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643	CONAIF (National Confederation of Fitter and Fluid Associations)	**Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.** **Six. In Article 22(2) on periodic inspections, the following sub paragraph has been added at the end of the current text.** 'Such inspections will also not be mandatory for places whose facilities consist solely of the equipment referred to in Article 20(2) or emergency lighting systems, unless their specific regulations so require.'	*'Systems consisting only of the equipment described in Article 9(2) will be subject to periodic inspection with a minimum scope of verification of the execution of preventive maintenance. If there is a specific regulation on the inspection of these systems, the scope of such inspection will be determined by the implementing rules.'* From CONAIF, we understand that not all FP systems should have the same scope of inspection, but all must be inspected, although such inspection is the verification of the performance of the mandatory maintenance.	R. It should be recalled that in the current RIPCI there is already an exception very similar to the one that is intended to be added, which aims to complete the current wording. The wording of the comment in practice would mean that both the exception of the current wording and the proposal of the draft RD would be null and void. On the other hand, it should be recalled that the purpose of these exceptions is to make it possible not to carry out inspections in certain cases, however, the maintenance of equipment is always mandatory. With this wording, it is sought that the level of the requirements of the text is not disproportionate to the situation it seeks to regulate.
644	General Secretariat for Industry and Mines, Government of Andalucía	Fifth Final Provision, Six. Article 22.2 RIPCI	We consider it more appropriate to refer to the equipment referred to in Article **9.2**, since the 20.2 does not explicitly include equipment but refers to those in Article 9.2.	R. The proposed Article 20.2 addresses the teams of Article 9.2, and therefore does not imply any change to cite one or the other. On the other hand, it is understood that by referring to Article 20(2) which refers to commissioning, it is clearer the reason for the exclusion of Article 22.2.
645	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Eight. In Annex I, Part 1, heading 1 'Fire detection and alarm systems', the following sentence has been added at the end of section 1: 'The design, installation and commissioning of voice alarm systems will be in accordance with standard UNE 23007-32'. In addition, in section 6,	Standard UNE 23007-32 standard involves installing sirens with radius 6 m. of coverage or separations of 12 m. in corridors, which means an oversized.	A. Note has been added to the table of standards by adding a qualification to this requirement.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		the following sentence is deleted: 'The 9 electroacoustic systems for emergency services will be in accordance with the provisions of standard UNE-EN 60849		
646	Official College of Telecommunications Engineers (COIT)	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Eight.	*Eight. In Annex I, Part 1, heading 1 'Fire detection and alarm systems', the following sentence has been added at the end of section 1:* *'The design, installation and commissioning of voice alarm systems will be in accordance with standard UNE 23007-32* ***and all Euro-standards EN 54'.*** ~~*In addition, in section 6, the following sentence is deleted:*~~ *'Electroacoustic systems for emergency services will be in accordance with the provisions of standard UNE-EN 50849'.* Voice-evacuation systems and acoustic emergency warning systems are key technological components of safety systems for certain types of facilities. These systems are used in hazardous and emergency situations to help people evacuate an area quickly and efficiently by using voice-message announcements and acoustic alarm signals. In this evacuation objective, **must be taken into account the linking of fire protection systems for any installation (FP), with voice evacuation systems**. This is done in other European countries such as Germany where they carry out checks on the entire FP system and including test protocol for the voice evacuation subsystem and complying with all Euro-standards EN 54. The EN54 family of standards is the reference standard throughout Europe, for voice evacuation systems, its design, installation and subsequent control is deemed essential and mandatory. Since 2017 in Spain, compliance with standard EN 54 in all its sections is mandatory for public premises with a capacity of more than 500 people and hospitals. The same standard should apply for industrial establishments requiring voice-	R. The proposal to quote 'all Euro-standards EN 54' would not be appropriate. The rules to be applied on a case-by-case basis are set out in the Annex. For its part, the citation of UNE 23007-32 is made in place of UNE-EN 50849. With the new wording, as a whole, all systems should be compatible with each other.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			alarm systems. It is important to mention that the evacuation and voice alarm system is part of the fire protection facility of the building, since it is designed to guarantee the safety of people in the event of fire. **In summary, the verification should consist of checking that the prescription of the FP installation includes the voice alarm system.** Subsequently, in the execution of the Project it is necessary to verify that this installation complies with standard EN-54, in its different sections, following a test protocol that is defined.	
647	Official College of Telecommunications Engineers (COIT)	ripci- Eight. In Annex I, Part 1, heading 1 'Fire detection and alarm systems', the following sentence has been added at the end of section 1: ...	~~*In addition, in section 6, the following sentence is deleted:*~~ *'Electroacoustic systems for emergency services will be in accordance with the provisions of standard UNE-EN 50849'.* Standard EN 60849 will be replaced by EN 50849, it is proposed to update the standard and not delete the sentence.	R. The subpoena of UNE 23007-32 is made in place of UNE-EN 50849. On the other hand, it should be noted that standard EN 50849:2017 in its scope excludes evacuation in the event of fires and that is why it has been chosen not to mention it here.
648	EBARA PUMPS IBERIA S.A.	Fifth final provision. Ten. In Annex I, section 1, heading 3 "Fire hydrant systems", the following two new sections 4 and 5 have been added: "4. Hydrants whose only intended use is the filling of trucks (those not intended for direct pumping), may be connected to the public water supply network, without the need for tanks or pumping equipment, provided that it is capable of providing the required pressure and flow rate.	As drafted, it could be implied that a simple connection to the public network is sufficient, without guarantee or reliability of supply. Standard UNE 23500 clearly establishes the conditions to be met by the drive system with pressure in the public network The supply to this hydrant network can be connected to the public network <u>provided that it meets the requirements set out in UNE 23500</u> Add to text: "4. Hydrants whose only intended use is the filling of trucks (those not intended for direct pumping), may be connected to the public water supply network, without the need for tanks or pumping equipment, provided that it is capable of providing the pressure and flow required in accordance with UNE 23500	R. The purpose of the wording is precisely not to oblige in these cases to apply UNE 23500 in its entirety, since it is understood that this requirement could be disproportionate in some situations.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
649	GENERAL COUNCIL OF THE TECHNICAL ARCHITECTURE OF SPAIN, CGATE	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Ten. In Annex I, section 1, heading 3 "Fire hydrant systems", the following two new sections 4 and 5 have been added: "4. Hydrants whose only intended use is the filling of trucks (those not intended for direct pumping), may be connected to the public water supply network, without the need for tanks or pumping equipment, provided that it is capable of providing the required pressure and flow rate. Alternatively, in the case of tanks, their capacity will be sized to ensure an autonomy of at least 60 minutes, unless otherwise provided for in the specific legislation.	In this case it would be advisable to clearly identify in the hydrant itself whether it is intended for direct pumping or for the filling of trucks exclusively.	A. In practice, hydrants on public roads are designed for filling trucks. Direct pumping hydrants are usually installed only in the cases of industries where the RSCIEI so requires. For this case, a text indicating the subject of its signalling has been added to Annex III of the RSCIEI.
650	FEDAOC	DF5 RIPCI, point 10, hydrants	There are several articles that mention the possibility of supplying certain systems through the public water network 'when it is able to provide the required pressure and flow'. In such cases, and in all cases where the required pressure and flow rate are to be justified, it should be made clear who should draft such justification and how to do so in order to prevent systems connected to the public network from being commissioned without due assurance. There is also no periodic post-start-up check, other than CB inspection, to verify that this public network continues to provide the required pressure and flow rate, and water systems may not function properly for five years without a way to detect it.	R. The current text is correct and clear enough. In practice, hydrants of this type are municipal hydrants that are installed on public roads.
651	THE COMMUNITY OF MADRID FIRE BRIGADE	**Ten. In Annex I, section 1, heading 3 "Fire hydrant systems", the following two new sections 4 and 5 have**	**Ten. In Annex I, section 1, heading 3 "Fire hydrant systems", the following two new sections 4 and 5 have been added**:	R. The current text is correct and clear enough. In practice, hydrants of this type are municipal hydrants that are in-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		been added: 4. Hydrants whose sole intended use is the filling of trucks (...) 5. (...)	In relation to this section Ten, the following observations are made: Section 4 imposes a requirement on the use of a public water supply network capable of providing the required flow and pressure. It has not been foreseen in this Royal Decree, the way in which this requirement will be verified, that is, whether it is planned to issue a specific specific certificate for an appropriate technical control (Channel, City Council, Projector Executor, etc.) or if, on the contrary, to attend the provisions of standard UNE 23500 for this purpose. It is proposed to delete the word **preferably**, underlined in the second paragraph of paragraph 5, to make it clear that the position of these valves should be **open** (with the exception of further causes, such as network breakdowns) It is also proposed to delete the word **preferably,** underlined in the third paragraph of section 5, and request a single type of lid for quick identification, without any ambiguities, or different alternatives to avoid the dispersal of solutions. You can propose a red **painted cap (RAL 3001 or equivalent), and have the inscription 'BOMBEROS' [firefighters] moulded on the cap** (so that it is always readable even if the paint colour deteriorates). In addition, the hydrants will have to be signposted according to UNE 23033. All this, because the rapid identification of a hydrant is key to the development of an intervention.	stalled on public roads. In such cases, the details of these hydrants are always in the hands of the municipalities.
652	Spanish Association of Water Supply and Sanitation	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Section 10, it is proposed to amend point 3 of section 1 of Annex I, heading 3 'Fire hydrant systems', which currently provides as follows:	Proposal for amendment: *'3. To consider an area protected by fire hydrants, the following conditions will be met, unless other applicable legislation imposes different requirements:* *a) The actual travel distance, measured horizontally, to any hydrant, will be less than 100 m in urban areas and 40 m in the rest. The competent public administration will be responsible for fulfilling this condition.*	R. Annex I is not the place to establish responsibilities. In any event, we understand that it is not true that the responsibility lies with the Administration. It is the owner who has to make sure there are hydrants nearby, and otherwise, install them, in cases where the applicable legislation requires it (CTE DB-SI or

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		'3. To consider an area protected by fire hydrants, the following conditions will be met, unless other applicable legislation imposes different requirements: a) The actual travel distance, measured horizontally, to any hydrant, will be less than 100 m in urban areas and 40 m in the rest. (...)"	(...)" This proposal for amendment is introduced in order to make it clear who is responsible for fulfilling this condition of distance between hydrants, since in the current wording it is not explicitly stated, although the responsibility for fulfilling this condition rests logically with the competent public administration.	RSCIEI).
653	Professional Association of Fire Technicians (APTB)	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Ten. In Annex I, section 1, heading 3 "Fire hydrant systems", the following two new sections 4 and 5 have been added: 4. Hydrants whose only intended use is the filling of trucks (those not intended for direct pumping), may be connected to the public water supply network, without the need for tanks or pumping equipment, provided that it is capable of providing the required pressure and flow rate. Alternatively, in the case of tanks, their capacity will be sized to ensure an autonomy of at least 60 minutes, unless otherwise provided for in the specific legislation.	In some fire interventions in some industries, firefighters lay hoses connected to **direct pumping hydrants**. After a while carrying out the extinguishing tasks, it is possible that the tank will empty, which would force us to modify the hose lines to connect them to our trucks. To solve the problem, we could supply water to the cistern at a faster rate that the public network provides by means of sockets for our trucks or for lines that come from the outside from hydrants of the public network. For this reason we request the possibility of including in the Regulation of Fire Protection facilities (RIPCI) that the tank, in addition to complying with UNE 23500, has the possibility of external supply through at least a 3" pipe and a 70 mm fitting, independent of filling the public network.	R. Although this possibility may be recommended (especially if it is done on a voluntary basis, in cases where it can be determined that it can be a benefit), it is not considered that it should be included as an obligation in all cases.
654	Professional Association of Fire Technicians (APTB)	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. 5. In the absence of any indication in the European standards setting the requirements for the hydrant drive mechanism, this mechanism will con-	With regard to the **identification of hydrants**, in some cities, they are signalling on the road itself by a symbol that coincides with the situation of the hydrant on the pavement, in this way when the firefighter vehicle is circulating it is seeing perfectly the situation of the hydrants. This type of signalling is giving very good result, for that reason we propose that you could consider the alternative of signalling them, either with a vertical signal on the pave-	R. While this possibility may be recommended, it is not considered that it should be included as an obligation in all cases. For hydrants located on the street, point out that this type of solution should be an initiative of the municipalities, once they evaluate their specific case. For hydrants located in estab-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		sist of a nut in which the upper part of the axle will be threaded which transmits the axial movement to the moving element of the closure. This mechanism will be operated by 25 mm x 25 mm square wrench for underground hydrants and 30 mm x 30 mm for column hydrants, rotating to close clockwise. In the case of intermediate valves in the hydrant branch (at the junction between the distribution network and the hydrant connection pipe), its opening mechanism must be capable of being operated by a 25x25 or 30x30 square wrench. These valves must preferably be in an open position to ensure that water reaches the hydrant, or otherwise, accessible and signposted in the same way as the hydrants themselves, in order to allow them to be opened quickly. **The lids of hydrants underground must be easily visible and preferably painted red (RAL 3001 or equivalent), or have the inscription 'fires' or an equivalent text allowing the hydrant to be quickly identified. The lids will also allow them to be opened by the Fire Extinction Services.'**	ment or with a signal on the road itself, or even with both signs.	lishments with the proposed current signage, this should be sufficient.
655	TECNIFUEGO	Eleven Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Referring to equipped firefighting fix-	R.D. 513/2017 Annex I Part 1 section 5 point 3 paragraph 4 reads: '...The distance from any point in the protected area to the nearest firefighting fixture will not exceed the radius of its action...' It is proposed that it be changed to: ' ...The distance from any point in the protected area to the nearest fire hydrant	R. The current text is correct and clear enough. No changes are necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		tures.	will not exceed 25 m...'	
656	Seguridad Ríos y Ortiz S.L	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. "4. For firefighting fixtures with semi-rigid hose or flat hose, the fire hydrant network will ensure, for at least one hour, the flow discharged by the two hydraulically most unfavourable (unless there is only one fire hydrant in the network, in which case it applies only to the network), complying with the following conditions: a) For firefighting fixtures with semi-rigid hose (25mm), this must provide a minimum flow rate of 85 litres/minute, which in the case of K=42 implies having a minimum pressure at the inlet of the firefighting fixtures of 4 bar (400kPa) measured in the manometer with the water flow completely open and spear tip in compact jet position. (Note: This type of firefighting fixture is designed to allow non-specialists immediate and effective intervention on the start of a fire, pending, if necessary, other more powerful measures). b) For firefighting fixtures with flat hose (45mm), it must provide a minimum flow rate of 160 litres/minute, which in the case of K=85 implies having a minimum pressure at the inlet of 3.5 bar (350kPa). (Note: This type of firefighting fixtures is capable	With respect to sections (a) and (b), maintainers are indicated that, at a certain pressure and K factor with the valve fully open, the flow rate is at least 85l/min in 25 mm hose and 160 l/min in 45mm firefighting fixtures. In these cases we are taking into account that the fully open valves are in ideal conditions, without being clogged like the pipes, in the same way that the lances comply with the K factor, without having malfunctions (which are usually very common in plastic lances). It is appropriate to clarify in this section that, in order for a maintainer to certify the operation of the system in the two most unfavourable firefighting fixtures, the pressure measurement is carried out with a calibrated pressure gauge and, in turn, a flow measurement is carried out with a flow meter Reliable flow and pressure data must be extracted in order to issue a maintenance certificate. What is intended to be avoided with this are practices where, based solely on the pressure values, can be theorised on the flow values and with this, valid a maintenance. It should be borne in mind that a valve that is clogged or does not open completely for whatever reason, or a lance that presents problems, can increase the value of the manometric pressure by having more resistance to the outlet of the water, causing in turn a decrease in flow in the outlet of the nozzle that would lose any correlation with the part exposed. Therefore, I consider it important to point out that, in order to certify a system, both measurements will be necessary, pressure with calibrated pressure gauge and flow rate with calibrated flowmeter. Another reason why to point out this is that different Supervisory Bodies have valid the theorisation of flow based on pressure, arriving to demonstrate with flowmeter the errors committed in the inspections. In point (d), it tells us that the pressure and flow data must be complied within all the system's firefighting fixtures. Does this mean that flow and pressure measurements must	R. The proposed text is exhaustive and makes clear the conditions for design and installation. This text does not enter into the operations of the maintenance technician, since these operations are defined in another annex, however, with the new wording the requirements should be perfectly clear.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		of providing a superior flow rate, but for its use greater training is required). c) With regard to the maximum pressure, it will be conditioned by the technical characteristics of the system (maximum service pressure) and by the manoeuvrability of the hoses during use. Consequently, the maximum pressure at the inlet of the firefighting fixtures with semi-rigid hose will not exceed 12 bar (1,200kPa) and with flat hose will not exceed 9 bar (900kPa), measured on the manometer with the water flow completely open and spear tip in compact jet position. the above pressure and flow requirements must be met in all system firefighting fixtures.'	be made on ALL firefighting fixtures of an installation? The text causes confusion, because at first it talks about making the measurement in the two hydraulically more unfavourable, implying that, if the two more unfavourable meet the minimum pressures of flow and pressure, the rest of the installation would also comply. However, point (d) mentions that ALL firefighting fixtures must comply, so I understand that if a maintainer has to certify the installation and operation of all firefighting fixtures under the above-mentioned pressure and flow conditions, they will have to perform the pressure and flow measurements throughout the firefighting fixture in order to be able to issue a valid maintenance certificate. If we only rely on the two most hydraulically unfavourable we would be theorising for the certification of the rest of firefighting fixtures, not being valid said certificate. Please clarify whether pressure and flow measurements must be performed on all Fire Mouths Equipped in order to issue a maintenance certificate.	
657	GENERAL COUNCIL OF THE TECHNICAL ARCHITECTURE OF SPAIN, CGATE	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Twelve. In Annex I, Part 1, heading 5 "Equipped firefighting fixtures", the first paragraph of section 4 is replaced by the following: "4. For firefighting fixtures with semi-rigid hose or flat hose, the fire hydrant network will ensure, for at least one hour, the flow discharged by the two hydraulically most unfavourable (unless there is only one fire hydrant in the network, in which case it applies only to the network), complying with the following condi-	b) For firefighting fixtures with flat hose (45mm), it must provide a minimum flow rate of 160 litres/minute, which in the case of K=85 implies having a minimum pressure at the inlet of 3.5 bar (350kPa). (Note: This type of fire hydrant is capable of providing a superior flow rate, but for its use it requires greater theoretical-practical training, as well as minimum annual training). (This contribution involves the need to prove a minimum of experience in the management of this system).	R. It is not intended to indicate requirements for users of these systems. The proposed note is only explanatory. The RIPCI does not intend to set requirements for users of equipment.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		tions: b) For firefighting fixtures with flat hose (45mm), it must provide a minimum flow rate of 160 litres/minute, which in the case of K=85 implies having a minimum pressure at the inlet of 3.5 bar (350kPa). (Note: This type of firefighting fixtures is capable of providing a superior flow rate, but for its use greater training is required).		
658	GENERAL COUNCIL OF THE TECHNICAL ARCHITECTURE OF SPAIN, CGATE	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Twelve. In Annex I, Part 1, heading 5 "Equipped firefighting fixtures" ...	*Firefighting fixture systems will consist of a network of water supply pipes and the necessary fire hydrant. The fire hydrant can be equipped with flat hose or semi-rigid hose. The additional 45 mm jack of the fire hydrant with semi-rigid hose, to be used by professional extinguishing services, will be equipped with valve, fitting and stopper for normal use.* This application of the additional 45 mm outlet should be clarified and an alternative text could be as follows: 'When it is mandatory to have 45 mm diameter fire hydrant, but it is not guaranteed that users have the minimum recommended training and training, 25 mm fire hydrant with semi-rigid hose can be available with an additional 45 mm socket to be used by professional extinguishing services, provided that the hydraulic dimensioning of the fire hydrant meets the requirements for a 45 mm fire hydrant'.	R. Where it should be said what type of fire hydrant to install is in the regulations that determine the endowments. In this case, it is in the RSCIEI that it is said when to put fire hydrant of 25 and when of 45. Therefore, it is not appropriate to change this wording in Annex I to the RIPCI.
659	Official College of Industrial Engineers of the Valencian Community	Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.*	Point Twelve, section C, page 10. The maximum pressures with maximum flow, of 12 bar for fire hydrant with semi-rigid hose and 9 bar for fire hydrant equipped with flat hose, are excessive, making it very difficult to handle the fire hydrant. **It is proposed:** Limit these values to, for example, 8 and 6 bar respectively, leaving the values of 12 and 9 as maximum static pressures, in any event. When it is intended for a system to limit maximum dynamic pressures, pressure reduction devices such as orifice plates or pressure reducing valves can be used.	PA. It is decided to set a maximum pressure of 9 bar in both cases. At this pressure, the hose is sufficiently manageable and the pipe network is far from its maximum pressure, in addition both maximum values are unified. On the concepts 'static' and 'dynamic', the proposed text already details how this should be measured.
660	AERME, Spanish	**Fifth final provision. *Amendment of***	It is proposed to amend:	A. The text is been changed.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	***the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Twelve. In Annex I, Part 1, heading 5 "Equipped firefighting fixtures", section 4 '4. For firefighting fixtures with semi-rigid hose or flat hose, the fire hydrant network will guarantee for at least one hour the flow discharged by the two hydraulically most unfavourable (unless there is only one firefighting fixture in the network, in which case it applies only to the network).'	'the fire hydrant network will guarantee during' Replace with: 'the fire hydrant network will ensure during' **Justification:** It is proposed to change the word guarantee to 'ensure' so that it is consistent with the wording of European standards that go in the sense of securing supply since nothing can be guaranteed.	
661	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Twelve. In Annex I, section 1, heading 5 "Equipped firefighting fixtures", section 4.b 4.b) For firefighting fixtures with flat hose (45mm), it must provide a minimum flow rate of 160 litres/minute, which in the case of K=85 implies having a minimum inlet pressure of 3.5 bar (350kPa)'	It is proposed to amend: ... minimum flow rate of 160 litres/minute, which in the case of K=85 implies having a minimum inlet pressure of 3.5 bar (350kPa)' Replace with: 'minimum flow rate of 170 litres/minute, which in the case of K=85 implies having a minimum inlet pressure of 4.0 bar (400kPa), measured in the manometer with the water flow completely open and spear tip in compact jet position.' **Justification:** It is proposed that all firefighting fixtures, whether semi-rigid hose as flat hose have the same minimum pressure at the inlet, specifying in both cases that it is with open flow and in a compact jet position, and thus simplify the regulation for a better understanding.	PA. The minimum pressure of 3.5 bar is maintained, since the 4 bar proposed in the comment would also meet the requirement in this type of fire hydrant, and in addition to this way it is allowed to go down to 3.5 in cases that the owner needs it and has only this type of fire hydrant. With this pressure, the flow they provide is sufficient. On the other hand, the second part of the sentence has been added, which says the same as in case 4(a) on how to perform the measurement.
662	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Twelve. In Annex I, section 1, heading 5 "Equipped firefighting fixtures", section 4.c 4.c) With regard to the maximum	It is proposed to amend: 4.c) With regard to the maximum pressure, it will be conditioned by the technical characteristics of the system (maximum service pressure) and by the manoeuvrability of the hoses during use. Consequently, the maximum pressure at the inlet of the firefighting fixtures with semi-rigid hose will not exceed 12 bar (1.200 kPa) and with flat hose will not exceed 9 bar (900 kPa), measured in the pressure gauge with the water flow completely open	PA. It is decided to set a maximum pressure of 9 bar in both cases. At this pressure, the hose is sufficiently manageable and the pipe network is far from its maximum pressure, in addition both maximum values are unified. It should be noted that it is important to put a sufficient range between the minimum

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		pressure, it will be conditioned by the technical characteristics of the system (maximum service pressure) and by the manoeuvrability of the hoses during use. Consequently, the maximum pressure at the inlet of the firefighting fixtures with semi-rigid hose will not exceed 12 bar (1.200 kPa) and with flat hose will not exceed 9 bar (900 kPa), measured in the pressure gauge with the water flow completely open and spear tip in compact jet position.	and spear tip in compact jet position. Replace with: 4.c) With regard to the maximum pressure, it will be conditioned by the technical characteristics of the system (maximum service pressure) and by the manoeuvrability of the hoses during use. Consequently, the maximum pressure at the inlet of the firefighting fixtures with semi-rigid hose or flat hose will not exceed 8 bar(800 kPa), measured in the pressure gauge with the water flow completely open and spear tip in compact jet position. **Justification:** The proposed text tries to achieve two things: 1.- That the pressure requirements are equal in the two types of firefighting fixtures to simplify the regulation and a better understanding of it. 2.- Reduce the pressure with open flow of the firefighting fixtures, since it has been proven that extinction with firefighting fixtures is not faster increasing the pressure, and yet the manoeuvrability of a firefighting fixture of 25 with 9 bar is very complex for a single person. In the case of firefighting fixture 45 although it must be used by two people it can also be very complicated. See test carried out on 10 and 11 October 2022 at the Metal Technology Centre (Murcia).	and maximum pressure value, so as not to over-restrict the design in an unjustified manner.
663	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Fifth Final Provision of the Royal Decree, point thirteen "3. Each building will have the number of dry columns sufficient so that the maximum route to them, following evacuation routes, is less than 60 m. Each column, ascending or descending, will have its independent outlet on the façade, or in an area easily accessible to Fire Extinction Services.'	Where it puts 'up to themselves' to replace with 'to the same'	A. Typo has been corrected.
664	TECNIFUEGO	Thirteen Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.	Correct the editing error (lack 'the") "3. Each building will have the number of dry columns enough so that the maximum route to them, following evacuation routes, is less than 60 m...	A. Typo has been corrected.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		Part 13, referring to Dry Column Systems.		
665	TECNIFUEGO	ripci- Thirteen and fourteen Annex I Part 1 Heading 6 Dry column	It is proposed to delete the crossed-out text. It is not appropriate to place an anti-return valve, as it prevents the spine from being emptied. 6. Dry column systems 1. The dry column system will consist of: a) Water supply on the façade or in an area easily accessible to the Fire Service, with the indication of 'USO EXCLUSIVE BOMBEROS"[FIREFIGHTER USE ONLY], ~~provided with anti-return valve~~, Siamese connection, with built-in keys and 70 mm fittings, with lid and 25 mm purge wrench.	A. The text is been changed.
666	Official College of Industrial Engineers of the Valencian Community	Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.*	Point Thirteen, page 10. Where it says: '*Each building will have the number of dry columns sufficient to ensure that the maximum route to them, following evacuation routes, is less than 60 m*' **It is proposed:** '*Each building will have the number of dry columns sufficient for* ***that the distance from any evacuation source to the nearest dry column****, following evacuation routes, is less than 60 m* '	R. The current text is correct and clear enough. No changes are necessary.
667	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Thirteen. In Annex I, part 1, heading 6 "Dry Column Systems", 3. Each building will have the number of dry columns sufficient so that the maximum route to them, following evacuation routes, is less than 60 m. (...)	Typo in the above sentence. Add 'las' between 'recorrido máximo hasta' and 'mismas,'.	A. Typo has been corrected.
668	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Fourteen. In Annex I, part 1, heading 6 "Dry Column Systems": In addition, in the inlet outlets, the floors or areas to which each water	It is proposed to amend: In addition, in the inlet outlets, the floors or areas to which each water intake is served will be identified, as well as the maximum service pressure. Replace with: In addition, in the inlet outlets, the floors or areas to which each water intake is served will be identified, as well as the	R. The proposed initial text is clearer than the comment proposal. If you want to elaborate more on how to calculate or check the maximum service pressure, perhaps a more appropriate place would be the guide of the regulation.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		intake is served will be identified, as well as the maximum service pressure.	pressure that has been carried out the tests of tightness and mechanical resistance. **Justification:** There is never a test of breakage of pipes or fittings, the tests carried out are those required in the RIPCI of 1 470 kPa (15 kg/cm²) in columns up to 30 m and 2.450 kPa (25 kg/cm²) in columns of more than 30 m in height, we understand that it refers to specifying this pressure, but it will not be the maximum of service, since it is not established in the regulation.	
669	Official College of Industrial Engineers of the Valencian Community	Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.*	Point Sixteen, page 10. Where it says: '*1. Automatic fixed firefighting systems in commercial kitchens will need, before installation, ...*' **It is proposed:** Indicate which type of kitchens this concerns, since they are not defined. For example, you can use the clarification in Standard UNE-EN 17446, where it explains that these are 'kitchens such as those used for example in restaurants, hotels and hospitals', so that the wording would be as follows: '*1. Automatic fixed firefighting systems in commercial kitchens **(such as those used for example in restaurants, hotels and hospitals)** will need, before installation, ...* '	A. Clarification has been added to allow for a better definition of these systems.
670	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Sixteen. In Annex I, Part 1(2) "16. Fixed extinguishing systems in commercial kitchens 2. The operation of these systems may be based on any of the following systems, depending on the technology and extinguishing agents that use: a) fixed automatic sprinkler extinguishing systems	It is proposed to remove: We believe it should be removed (a) Fixed automatic sprinkler extinguishing systems **Justification:** By indicating that for the purpose of justifying compliance with the provisions of standard UNE-EN 17446. If they are automatic sprinklers, the system would not have manual firing required by this UNE, this same standard indicates. Systems in which the extinguishing agent may be located in areas likely to be exposed to high temperatures (e.g. inside the hood) are not deemed adequate, provided that this situation can lead to degradation and, therefore, the loss of effectiveness of the extinguishing agent.	R. It is stated that they may be 'full or partially' based on these systems. The reference is not removed from the list because it is understood that it is a technology that can be used in these systems (even if it is partially) and therefore must appear.
671	TECNIFUEGO	ripci- Seventeen.	It is proposed that the percentage of space to be occupied	A. The value of the text has been

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		In Annex I, section 2 "LUMINESCENT SIGNALLING SYSTEM", the following has been added at the end of section 1: The signs must not contain symbols or inscriptions outside the message to be transmitted by the signal itself or which may make it difficult to read it, except those which are strictly necessary for the identification of the signal (as described in section 3 for photo luminescent signals), which in no case must invade the pictogram of the signal, having to be grouped in the margins of the signal and should not occupy more than 2 % of its total surface area.'	by the information outside the message to be transmitted should be increased to 3 %, since UNE 23035 for photo luminescent signals establishes the marking to be carried by these signals and it is desirable that it be visible and legible to facilitate future inspections and checks.	changed to putting 3 %.
672	TECNIFUEGO	ripci- Seventeen Annex I Part 2 First and second paragraphs "Signals should be placed in such a way that they are clearly visible (position, size and type of signal), taking into account the characteristics of the place where they are to be located. Signalling can also be reinforced by beacons and evacuation plans. Non-luminescent signals may be used when their visibility is not impaired, as well as on buildings and public roads. For signs inside buildings, if these are not luminescent, they must be illuminated externally, and must be visible even in the event of a failure in the supply of normal lighting. Where environmental conditions are not adequate to ensure the	The minimum luminosity is not indicated on the signal, at least it should be as indicated in the REBT for means of manual extinguishing. The following text is proposed: 'Non-luminescent signals may be used when their visibility is not impaired, as well as on buildings and public roads. Signs other than luminescent will be illuminated externally under the same conditions and luminous intensity as required by the regulations applicable to the medium, and must be visible even in the event of failure to supply normal lighting.'	R. The current text is correct and is sufficiently clear and detailed. It is understood that changing this is not necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		conservation status of the signal (e.g. in adverse climates), the appropriate supporting material and protections should be used.		
673	THE COMMUNITY OF MADRID FIRE BRIGADE	Seventeen. In Annex I, section 2 "LUMINESCENT SIGNALLING SYSTEMS", the following has been added at the end of section 1: "Signals should be placed in such a way that they are clearly visible (position, size and type of signal), taking into account the characteristics of the place where they are to be located. Signalling can also be reinforced by beacons and evacuation plans. Non-luminescent signals may be used when their visibility is not impaired, as well as on buildings and public roads. For signs inside buildings, if these are not luminescent, they must be illuminated externally, and must be visible even in the event of a failure in the supply of normal lighting. Where environmental conditions are not adequate to ensure the conservation status of the signal (e.g. in adverse climates), the appropriate supporting material and protections should be used	Seventeen. In Annex I, section 2 "LUMINESCENT SIGNALLING SYSTEM", the following has been added at the end of section 1: The proposed text: *'For signs located inside buildings, if they are not luminescent, they must be illuminated externally, must be visible even in case of failure in the supply to normal lighting"*, can lead to solutions of vinyl printed and glued by adhesive directly to the emergency lighting, which could lead to a loss of lighting in evacuation routes, so it is requested to review this section in order not to give rise to confusion.	R. Differentiate signalling from emergency lighting. Both requirements are regulated in different places and must be met simultaneously. The current wording is clear in what it intends to say. It is understood that changing this is not necessary. In any event, if further clarification were needed, they could be included in the guide to the regulation.
674	NATIONAL ASSOCIATION OF SIGNAL MANUFACTURERS	The signs must not contain symbols or inscriptions alien to the message to be transmitted by the signal itself...	It is proposed to cancel this paragraph, because we believe that it should be discussed. It is proposed to postpone this decision and open a forum for discussion. In the near future, UNE23035-4 will be reviewed, which is mandatory and where the information that must appear in the signs is detailed, in our opinion it is the appropriate forum for discussion to define and incorporate the new requirements raised in this alteration.	R. The proposed text does not contradict the above-mentioned standard, and in any case, even if it did, what the RIPCI says should prevail over what the technical standards say, the use of which depends on whether or not it is decided to cite them in it.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
675	NATIONAL ASSOCIATION OF SIGNAL MANUFACTURERS	...those which are strictly necessary for the identification of the signal (as described in paragraph 3 for photo luminescent signals), which in no case must invade the pictogram of the signal, 'should be grouped in the margins of the signal' and must not occupy more than 2 % of its total surface area.'	The final design of each signal, is conditioned by several norms and pictograms, so it is very restrictive at the same time that they do not hinder the reading of it, which the mandatory information is or not grouped. It is proposed to delete **'grouped'** thus leaving the text with the proposed amendment: The signals must not contain symbols or inscriptions outside the message to be transmitted by the signal itself or which may make it difficult to read it, except those that are strictly necessary for the identification of the signal (as described in section 3 for photo luminescent signals), which in no case must invade the pictogram of the signal, **'must be placed in the margins of the same'** and should not cover more than 2 % of its total surface.'	A. The word 'grouped' has been deleted. In any event, it should be noted that these inscriptions outside the message of the signal can confuse the occupants of the places and do not provide them with information, so they should be placed in a place where they do not bother.
676	EBARA PUMPS IBERIA S.A.	Fifth final provision. Twenty. "**Relation of UNE and other internationally recognised standards** FIXED EXTINGUISHING SYSTEMS BY AUTOMATIC SPRINKLERS AND SPRAYED WATER PNE-prEN 12259-12:	A PNE-prEn is a standard in the process of being developed, that is, without finalisation. That is why it contradicts the **fourth final provision** where it cites **These rules are identified by their titles and numbering, including the year of edition.**'. In addition, by the very evolutionary process of the formation of a standard, in a particular section today you can have a criterion 'A', after some time change to a different 'B' and finally end in a different 'C' It should be added to all the above that, since it is not finished, it is not available to the general public on the UNE/ AENOR standards acquisition portal. Remove this PNE prEn from the list	PA. The rules cited in the final wording must be finalised, and quoted with a date and year, or else they will be removed from the list. The draft RD sent to public hearing is an unfinished text published to receive submissions, and as such is not intended to be a final text. The UNE standards also have a similar processing process, which also includes a public consultation where everyone can access their full content and make comments.
677	EBARA PUMPS IBERIA S.A.	Fifth final provision. Twenty. "**Relation of UNE and other internationally recognised standards** REPORTS FOR THE REVIEW OF FIRE PROTECTION FACILITIES AND EQUIPMENT PNE23580-12 PNE23580-13 PNE23580-15	A PNE is a standard in the process of being developed, that is, without finalisation. That is why it contradicts the **fourth final provision** where it cites **These rules are identified by their titles and numbering, including the year of edition.**'. In addition, by the very evolutionary process of the formation of a standard, in a particular section today you can have a criterion 'A', after some time change to a different 'B' and finally end in a different 'C' It should be added to all the above that, since it is not fin-	PA. The rules cited in the final wording must be finalised, and quoted with a date and year, or else they will be removed from the list. The draft RD sent to public hearing is an unfinished text published to receive submissions, and as such is not intended to be a final text. The UNE standards also have a similar processing process, which also includes a public consultation where everyone

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		PNE23580-16	ished, it is not available to the general public on the UNE/ AENOR standards acquisition portal. Remove these PNEs from the list.	can access their full content and make comments.
678	FEDAOC	Fifth final provision, in which Royal Decree 513/2017 is amended, in the table 'Relationship of UNE and other internationally recognised standards'.	In the section on fixed gaseous agent extinguishing systems, standard UNE ISO 6183 (for CO2 systems) is not included. This standard is contemplated in the series of standards UNE-EN 15004 (Systems by gaseous extinguishing agents), and is included in the Technical Guide of Royal Decree 513/2017. Proposal: include standard UNE ISO 6183. NFPA standards are not mentioned in the list of internationally recognised UNE and other standards. It is proposed to explicitly include standard UNE ISO 6183, and recognise NFPA standards	R. Reference to the standard has been added in Annex I and in the table of standards.
679	TECNIFUEGO	Twenty In the fifth final disposition. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May, Section 20, in the subsection "SYSTEMS OF FIRE DETECTION AND ALARM" of the table of List of UNE and other internationally recognised standards (pages 12 to 19)	It is proposed to delete standards UNE EN 54-27, UNE EN 54-28, UNE EN 54-29, UNE EN 54-30 and UNE EN 54-31. All these rules are pending the CPR situation and their possible update when resolved, they are not currently cited in the OJEU and on the other hand they are included here without being cited in the section corresponding to the detection systems.	R. References are deleted, pending harmonisation in the CPR (CE marking).
680	TECNIFUEGO	Twenty In the fifth final disposition. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May, Section 20, in the subsection 'FIXED SYSTEMS OF EXTINCTION BY AUTOMATIC SPRINKLERS AND SPRAYED WATER' of the list of UNE and other internationally recognised standards (pages 12 to 19)	Include the following standard: UNE 23540-1:2022 Pipe prefabrication for fire protection facilities. Part 1: Non-alloy steel pipes.	R. This standard addresses a specific case (prefabricated pipes, understanding as such that a part of the work that is traditionally done in the work itself – welding, etc. – is done in other facilities outside it), and the use of which is not mandatory. In any event, the table of rules mentions only the rules that have been cited in the text of the standard, and this rule is not mentioned in the text, so it is not appropriate to cite it in the table.
681	TECNIFUEGO	Twenty Fifth final provision. Twenty. "**Relation of UNE and other**	A prEn that has been in the process of elaboration, for quite some time, without finalisation, contradicts the fourth final provision where it is quoted 'These rules are identified by	A. The reference has been deleted.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		internationally recognised standards FIXED EXTINGUISHING SYSTEMS BY AUTOMATIC SPRINKLERS AND SPRAYED WATER PNE-prEN 12259-12:	their titles and numbering, including the year of edition.' Remove this prEn from the list	
682	TECNIFUEGO	Twenty In the fifth final disposition. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May, Section 20.	Note that for CO_2 extinguishing systems standard UNE ISO 6183-2015 Fire Protection Equipment. Carbon dioxide extinguishing systems for use in buildings. Design and installation.	R. Reference to the standard has been added in Annex I and in the table of standards.
683	Official College of Industrial Engineers of the Valencian Community	Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.*	Point Twenty, page 12. When referring to the UNE standards for hoses, standard 'UNE-EN 694:2015, Fire-fighting Hoses' does not appear. Semi-rigid hoses for fixed systems'. Although this standard is referenced in the fire hydrant standard (UNE EN 671-1:2013). **It is proposed:** Specify this standard in the section on hoses.	R. Standard EN 671-2:2012 is a harmonised standard of the CPR and therefore for compulsory use (EC marking). Standard UNE-EN 694:2015 has not been harmonised by the CPR. (In the event of a standard referring in its content to another standard, it would not be required to appear explicitly in this list.) The wording is correct and complete as it is, and does not require changes.
684	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	Fifth final provision. Point 20	**Proposal**: Include NFPA standards in the list of design standards, at least in the chapter 'Fixed EXTINCTION SYSTEMS BY AUTOMATIC SPRINKLERS AND SPRAYED WATER'**.** Not including international standards in the list means sending a large part of the files directly to the route of equivalent security measures.	R. The standards listed are those referred to in the corresponding section of the regulation, which are UNE/EN standards for both products and systems. This is particularly relevant in the case of harmonised standards in European directives (CE marking), as well as standards that develop the design of facilities with the aforementioned products listed in the CE marking.
685	Professional Association of Fire Technicians (APTB)	Fifth final provision Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Twenty. The Appendix to Annex I 'Round of UNE and other internation-	It is related to other internationally recognised standards and they nevertheless do not appear in the list.	C. The rules on the list are those cited (with specific references) in the regulations. The list is correct and complete.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		ally recognised standards' is replaced		
686	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Twenty. The Appendix to Annex I 'Round of UNE and other internationally recognised standards' is replaced; FIRE WATER SUPPLY SYSTEM Note: 1 Where the required supply category is I, the combinations of water sources and drive systems in Figures 11,13,15 16 and 17 of Tables 4 and 4B of Section 5.3. of Supply Classes are accepted, provided that the installation does not require double supply in accordance with other regulations in force and the following conditions are not met: a) The length measured in a straight line from the point of supply and the system furthest from it exceeds 2 000 m. b) The total area protected by automatic sprinklers exceeds 250 000 m².	**It is proposed to delete**: note 1. *Note: 1 Where the required supply category is I, the combinations of water sources and drive systems in Figures 11,13,15 16 and 17 of Tables 4 and 4B of Section 5.3. of Supply Classes are accepted, provided that the installation does not require double supply in accordance with other regulations in force and the following conditions are not met:* *a) The length measured in a straight line from the point of supply and the system furthest from it exceeds 2 000 m.* *b) The total area protected by automatic sprinklers exceeds 250 000 m².* **Justification:** Standard 23500 itself determines that Category I supplies are double supply classes. Therefore, this note does not make sense.	R. The note is put to nuance what the standard says, since it has been felt that the proposed clarification was necessary.
687	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Twenty. The Appendix to Annex I 'Round of UNE and other internationally recognised standards' is replaced; FIRE WATER SUPPLY SYSTEM Note: 2 For combinations of water sources and drive systems and categories resulting from Tables 4A and	**It is proposed to delete**: note 2. *Note: 2 For combinations of water sources and drive systems and categories resulting from Tables 4A and 4B of section 5.3. of Supply Classes, the public use network 1 may be deemed superior supply class and may be used for category II supply.* **Justification:** The network for public use is deemed for all purposes a simple supply, in standard UNE 12845 of sprinklers it determines this supply as simple superior to equating it with a tank with two pumps. As can be seen this submission is very harmful to security because large water supply facilities can be carried out with a supply system that	R. The note is set to qualify what the standard says. The proposal is made because it is understood that the latest version of the standard has increased the requirements with respect to previous versions without taking into account certain cases, which may harm the viability of some types of facilities. When determining the requirements applicable to an installation, the safety and proper functioning of the installation and the proportionality of the require-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		4B of section 5.3. of Supply Classes, the public use network 1 may be deemed superior supply class and may be used for category II supply.	does not in any case ensure supply of flow and pressure.	ments should be combined.
688	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. Twenty-one. In Annex II, section 5, the phrase 'For the monitoring of fire protection equipment and systems maintenance programmes set out in Tables I, II and III, minutes will be drawn up in accordance with the UNE 23580 series of standards and containing at least the following information:', 'For the monitoring of the maintenance programmes for fire protection equipment and systems set out in Tables I, II and III, minutes will be drawn up consisting of a certificate containing general information and a checklist attached to the details of the operations in accordance with Article 17(e). For the preparation of these minutes, the formats referred to in the UNE 23580 series of standards may be used, or another equivalent format may be used. In any event, the minimum content of the minutes will be as follows:"	Twenty-one. In Annex II, section 5, the phrase 'For the monitoring of fire protection equipment and systems maintenance programmes set out in Tables I, II and III, minutes will be drawn up in accordance with the UNE 23580 series of standards and containing at least the following information:', 'For the monitoring of the maintenance programmes for fire protection equipment and systems, as set out in Tables I, II and III, minutes will be drawn up consisting of a certificate signed by the technical manager of the undertaking with the general information and checklists annexed to the details of the operations, in accordance with Article 17(e). For the preparation of these minutes, the formats referred to in the UNE 23580 series of standards may be used, or another equivalent format may be used. In any event, the minimum content of the minutes will be as follows:" JUSTIFICATION. These certificates must be signed by the technical manager of the company, as set out in the Technical Guide for the Application of the Fire Protection Facilities Regulation (Royal Decree 513/2017), revision 3 March 2022 (page 31/96) and this should be reflected in the amendment to the wording of Annex II, section 5.	A. The wording of the paragraph is amended.
689	AERME, Spanish Association of Companies Installing and Maintaining Fire Pro-	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Twenty-one. In Annex II, section 5,	It is proposed to amend: For the monitoring of the maintenance programmes for fire protection equipment and systems, as set out in Tables I, II and III, **reports must be drawn up, consisting of a certificate containing the general information and a checklist attached with the operational de-**	PA. The wording of the paragraph is amended so that it is better understood, however, Article 17(e) is still referred to.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	tection Equipment and Systems	the phrase 'For monitoring of maintenance programmes for fire protection equipment and systems is replaced; For the monitoring of the maintenance programmes for fire protection equipment and systems, as set out in Tables I, II and III, reports must be drawn up, consisting of a certificate containing the general information and a checklist attached with the operational details, in accordance with section 17(e). For the preparation of these minutes, the formats referred to in the UNE 23580 series of standards may be used, or another equivalent format may be used. In any event, the minimum content of the minutes will be as follows:'	**tails, in accordance with section 17(e)**. For the preparation of these minutes, the formats referred to in the UNE 23580 series of standards may be used, or another equivalent format may be used. In any event, the minimum content of the minutes will be as follows:' Replace with: For the monitoring of the maintenance programmes for fire protection equipment and systems, as set out in Tables I, II and III, **will be drawn up with a certificate attached to the general information and a checklist as set out in the UNE 23580 series of standards.** For the preparation of these minutes, the formats referred to in the UNE 23580 series of standards may be used, or another equivalent format may be used. In any event, the minimum content of the minutes will be as follows:' Justification: Facilitate the understanding of the section of the regulation.	
690	TECNIFUEGO	ripci- Twenty-three Annex II Part 1 Table II Detection system The service life of the fire detectors will be as established by the fire detector manufacturer. In the event that the manufacturer does not establish a service life, it will be considered to be 10 years from its commissioning. Once their service life is exceeded, they will be replaced, unless it is verified that their operating state (reliability, sensitivity, response time and status of internal components) remains fit for service. This verification will be carried out once its useful life is exceeded and every five years successively, taking a representative	The size or criterion of the test is not indicated, any scenario being possible even the annual test of Table II. Since the OCAs have the power to verify on-site facilities, which guarantees environmental conditions, EMCs, etc. of installation, it is proposed to carry out a selective activation test during the mandatory periodic inspection: The following text is proposed: 'In the event that the manufacturer does not establish a service life, it will be considered to be 10 years from its commissioning. Once their service life is exceeded, they will be replaced, unless it is verified that their operating condition is still fit for service. This verification will be carried out once its useful life has been exceeded, during the mandatory periodic inspections established by the applicable regulations, on a selective sample of equipment that the supervisory body has established for such verification (e.g. equipment under worse environmental conditions, of each type, plant and sector), recording its result in the corresponding report.	R. Regarding the proposal, it should be noted that the tables in this annex speak of maintenance, not inspections. It is not appropriate to make the tasks of the maintenance technician conditional on inspections.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		sample of units. In the case of detectors installed prior to the publication of Royal Decree 513/2017, of 22 May, and that have not fixed a useful life by their manufacturer, this verification will be carried out after they have been in operation for 10 or more years.		
691	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Twenty-three. In Annex II, Part 1, Table II 'Annual and five-year maintenance programme for active fire protection systems', the contents of the table are amended as follows: The row for 'Equipment or system: Fire detection and alarm systems. Detectors' will be worded as follows: The service life of the fire detectors will be as established by the fire detector manufacturer. In the event that the manufacturer does not establish a service life, this is deemed to be 10 years from commissioning, they will be replaced, unless it is verified that their operating state (reliability, sensitivity, response time and condition of the internal components) remains fit for service. This verification will be carried out once its useful life is exceeded and every five years successively, taking a representative sample of units. In the case of detectors installed prior to the publication of Royal Decree	It is proposed to amend: The service life of the fire detectors will be as established by the fire detector manufacturer. In the event that the manufacturer does not establish a service life, this is deemed to be 10 years from commissioning, they will be replaced, unless it is verified that their operating state (reliability, sensitivity, response time and condition of the internal components) remains fit for service. This verification will be carried out once its useful life is exceeded and every five years successively, taking a representative sample of units. In the case of detectors installed prior to the publication of Royal Decree 513/2017, of 22 May, and which do not have a service life set by their manufacturer, this verification will be carried out after they have been in operation for ten or more years. Replace with: The service life of the fire detectors will be as established by the fire detector manufacturer. In the event that the manufacturer does not establish a service life, it will be considered to be 10 years from its commissioning. Once their useful life is exceeded, they will be replaced, unless a verification of a representative sample of units is carried out, by an authorised laboratory or the manufacturer, in order to remain fit for service, at most every five years from its last verification. In the case of detectors installed prior to the publication of Royal Decree 513/2017, of 22 May, and which do not have a service life fixed by their manufacturer after they have been	R. It is understood that the current text is more detailed and appropriate for the activity to be described. Changing the text is not appropriate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		513/2017, of 22 May, and which do not have a service life set by their manufacturer, this verification will be carried out after they have been in operation for ten or more years.	in operation for 10 or more years. The required verification will be carried out to increase its useful life or its replacement. **Justification:** Nowadays, there is no procedure or tools for the maintainer to verify with real comparative data regarding the amount of smoke (gas) to check the sensitivity and response time, by providing the current equipment variable smoke amounts according to the expert who performs it, would be operations of collecting detectors sent to the laboratory or manufacturer. The text as it is written because there is no standardised pattern, can be very variable depending on the expert who excites the detector, however, every year the detectors are required to be checked, we suggest the following text:	
692	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** Twenty-four. In Annex II, Part 1, Table II 'Annual and five-year maintenance programme for active fire protection systems', in its row 'Equipment or system: Firefighting fixtures', 'Fire hoses will be replaced at least every 20 years from their commissioning, unless their manufacturer certifies for them longer durability'.	**It is proposed to amend:** 'Fire hoses will be replaced at least every 20 years from their commissioning, unless their manufacturer certifies for them longer durability'. **Replace with:** Fire hoses will be replaced at least every 20 years from the date of installation or manufacture, unless their manufacturer certifies for them longer durability **Justification:** Given the number of facilities that do not have registered commissioning in the administration, it is suggested to replace date of commissioning by date of installation or manufacture.	R. The current text is clear enough. There is no need to make changes. When the situation that is discussed happens, you usually go to the existing documentation to know what the date to apply. In practice, this is not a relevant problem.
693	General Secretariat for Industry and Mines, Government of Andalucía	Fifth Final Provision, Twenty-four. Annex II, part 1, table II of the RIPCI	The type of durability certification required of the hose manufacturer should be specified.	R. The current text is sufficiently detailed. It is not deemed necessary to extend it further.
694	Catalonia Safety Cluster Against Fires (CLÚSIC)	Provision. Fifth final. Page 21. paragraph 25 "For fixed total flooding systems of	There is no mention of the blower-door test, which makes it possible to check the level of tightness of the room much more accurately than the visual check and without the need	R. The proposed text seeks to differentiate when it is sufficient to carry out a visual inspection, and when more ad-

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		gaseous extinguishing agents, verify the watertightness of the protected room. To this end, it must be checked whether there have been penetrations or other changes in the enclosure that may affect leakage or the performance of the extinguishing agent. This verification may be carried out by means of a visual check, without the need to carry out a sealing test under unloading conditions, provided that no works or changes have been made in the room that may have affected its tightness since the last test carried out. During the visual check, it will be checked that the room has not been modified, and in the case of alterations, that they are documented and that they do not affect the tightness.'	for an actual discharge test. In tests carried out that according to the client was all airtight, significant leaks have been detected that after thorough investigation have turned out to be true, but that were hidden. Bodies such as CEPREVEN require that at the least, the blower-door test is performed. **PROPOSAL:** "For fixed total flooding systems of gaseous extinguishing agents, verify the watertightness of the protected room. To this end, it must be checked whether there have been penetrations or other changes in the enclosure that may affect leakage or the performance of the extinguishing agent. This verification may be carried out by means of a visual check, without the need to carry out a sealing test under unloading conditions, provided that no works or changes have been made in the room that may have affected its tightness since the last test carried out. In the visual check, it will be verified whether the room has not been modified, and in the case of alterations, that they are documented and that they do not affect the tightness. At least one actual discharge or door fan test (Annex E to standard UNE 15004-1) must be carried out during commissioning and every five years.'	vanced tests should be carried out. In this respect, what the text is intended to say is clear.
695	TECNIFUEGO	ripci- Twenty-five Annex II, Part 1, Table II 'Annual and five-year maintenance programme for active fire protection systems' "For fixed total flooding systems of gaseous extinguishing agents, verify the watertightness of the protected room. To do so, it must be verified whether there have been penetrations or other changes in the enclosure that may affect leakage or the extinguishing agent stations. This verification may be carried out by means of a visual check, without the need to carry out a sealing test under unloading conditions, provided that	It should be added, to make it explicit: 'In the absence of sufficient prior information or visual inspection impossibility, the leakage must be verified and certified by actual proof'. This submission is justified by being on the side of the safety of the user of the system, since there may have been undocumented changes that visually do not clarify the situation of tightness of the room (e.g. around electrical cabinets, decorations, etc.) and can be transmitted to the maintainer or user a responsibility to certify something (watertightness of the room) that may have been affected by multiple factors.	R. The text already states in which cases each type of check should be carried out. The maintenance technician must have historical information of what has been done. No further details need to be added to the text.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		no works or changes have been made in the room that may have affected its tightness since the last test carried out. During the visual check, it will be checked that the room has not been modified, and in the case of alterations, that they are documented and that they do not affect the tightness.'		
696	TECNIFUEGO	ripci- Twenty-six Annex II Part 2nd 'For photo luminescent signals, from the age of 20 years from their manufacture they must be replaced unless it is justified that the measurement on a representative sample, in accordance with standard UNE 23035-2, provides values not less than 80 % of those for which the signal was manufactured (according to UNE 23035-4). These measurements will then be repeated every 10 years."	**No sample size can be one or all**: The size or criterion of the sample or test is not indicated, one or all of which is possible, so since a standardised laboratory test is required here, **The following text is proposed**: 'For photo luminescent signals, from the age of 20 years from their manufacture they must be replaced unless it is justified that the measurement on a sample of 5 % or at least one signal per sector and plant, in accordance with standard UNE 23035-2, provides values not less than 80 % of those for which the signal was manufactured (according to UNE 23035-4). These measurements will then be repeated every 10 years.'	R. The current text is correct and clear enough. No changes are necessary.
697	Official College of Industrial Engineers of the Valencian Community	Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.*	Point 27, page 21. Where it says: "*1. Hold a university degree whose field of competence, legal powers or curriculum covers the subjects covered by this Regulation, for which it attests to its qualification."* **It is proposed:** "*1. Having a university degree **whose legal attributions** cover the subjects covered by this Regulation, for which it accredits their qualification*." Spain is a country with regulated professions, to which professional powers are legally assigned. A competence is not an attribution, it is a part of an attribution.	R. It is understood that the current text is correct, and that no changes are needed.
698	Levante Official College of Agricultural Engineers	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May.	Point 27, page 21. Where it says: "1. Hold a university degree whose field of competence, legal powers or curriculum covers the subjects covered by this Regulation, for which it attests to its qualification.'	R. It is understood that the current text is correct, and that no changes are needed.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			It is proposed: 'Have a university degree whose curriculum covers the subjects covered by this Regulation, for which it attests to its qualification.'	
699	particular	Ripci- Section 1.4 of Part 1 of Annex I to Royal Decree 513 of 2017 provides; '*The alarm buttons will be positioned so that the maximum distance to be travelled, from any point to be deemed the source of evacuation, until reaching a push button, does not exceed 25 m*'. It also states in section 4.4 of the same Part; '*...fire extinguishers...their distribution will be such that the maximum horizontal travel, from any point in the fire sector, which is to be deemed the source of evacuation, to the extinguisher, does not exceed 15 m*'. Similarly, section 5.3 of the same section provides; '*for firefighting fixtures with semi-rigid hose or flat hose, the maximum separation between each fire hydrant and its nearest fire hydrant will be 50 m*', i.e. 25 m from any point to be considered for use.	I consider that the distances of these three active fire protection elements (pullers, extinguishers and fire hydrant) should be defined at a single and equal distance of 25 m from any point of origin, thus unifying the distance of the fire extinguishers with their other two names. Unifying the three elements at the same distance, the means are concentrated at the same point, where emergency signalling and lighting would facilitate their location and installation.	R. The current text is correct and clear enough. Each system has its own particularities. No changes are necessary.
700	particular	Ripci- Section 5.3 of Part 1 of Annex I to Royal Decree 513 of 2017, establishes the obligation, if required, to install a fire hydrant system.	I consider that the obligation to install fire hydrant under the sole premises of the level of risk or surfaces is not entirely. The type of activity is another premise to consider. We have to start from the fact that the use of fire hydrant requires not only well trained personnel, but also that it has the individual protections necessary to protect itself from the by-products of smoke. A fire hydrant involves exposing users (workers), to fire, heat, smoke and gases at an exposure time that without means of individual protection, could pose a risk to their safety and health. Therefore, I understand that if this exposure were zero when replacing the fire hydrant with automatic sprinkler system, the performance	R. The endowments of this type of system are not made in the RIPCI but in its specific regulations (such as the CTE DB-SI or RSCIEI). That is where it is said in which cases you should install them.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			would be faster and safer. Likewise, in activities attended by the public, the internal emergency teams to the activity would devote their intervention to the evacuation of people outside the activity, and not reduce the number of participants, giving more importance to evacuation than to action against fire.	
701	particular	Ripci- In section 6.1.b.1 of Part 1 of Annex I to Royal Decree 513 of 2017, it states '*upstream dry column systems will consist of outputs on even floors up to the eighth and all thereafter, provided with Siamese connection, with built-in keys and 45 mm fittings with cap; every four floors, a sectioning valve will be installed, above the corresponding plant outlet*'.	I consider that the outlets from the dry column should not only be in the even floors (until the eighth), but in both even and odd floors, so that the intervention of the Firefighters is faster and more effective, eliminating the need to carry out from the even outlets to the odd intervention floors.	R. The current text is correct and does not require alterations. It is not considered that what is proposed in the submission should be a mandatory requirement.
702	Catalonia Safety Cluster Against Fires (CLÚSIC)	Provision. Fifth final. Page 7	Annexes IV and V mention the possibility of installing inertisation systems in cold-store chambers in accordance with standard UNE-EN 16750:2018, but this final provision does not include them, so they would be outside the RIPCI. **PROPOSAL:** Include in this provision the alteration of the RIPCI so that the inertisation systems can be placed on the market, installed and maintained in an appropriate way.	R. Given its very specific and uncommon use, it is opted for the moment not to include it in the RIPCI as its own system. The current wording within the RSCIEI is sufficient.
703	Spanish Association of Water Supply and Sanitation	Fifth final provision. Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May. It is proposed to add a new paragraph five, to amend Article 14(3), which currently provides: *'Article 14. Scope of action of maintenance companies.* *1. The maintenance of equipment and systems referred to in this Regu-*	Proposal for amendment: *'Article 14. Scope of action of maintenance companies.* *1. The maintenance of equipment and systems referred to in this Regulation will be carried out by maintenance companies, duly authorised before the competent body of the Autonomous Community in which they request registration as a maintenance company, in the equipment or systems they will maintain.* *(...)* *3. They are exempted from the provisions of section 1:* *a. Fireproof blankets.* *B. The hydrants located on public roads, in which case their installation requirements (location, distances to façades and*	R. For clarity, all the requirements applicable to this particular case have been introduced in the same place, and are therefore already covered by the text. There is no need to make any changes to this section.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		lation will be carried out by maintenance companies, duly authorised before the competent body of the Autonomous Community in which they request registration as a maintenance company, in the equipment or systems they will maintain. *(...)* *3. They are exempted from the provisions of section* *1 flame retardant blankets.'*	*curbs, buried type or surface, model and characteristics), of their maintenance plan and the periodicity thereof, will be those determined by the competent municipality or public administration, on a proposal, where appropriate, of the managing body of the water supply service'.* *This proposal for amendment is introduced in order to reflect the exception of hydrants located on public roads included in Article 9(2)(d) on the scope of action of installation companies, also in Article 14(3), concerning the scope of action of maintenance companies, since for this type of fire protection facilities it should also be the competent administration that sets the requirements of their maintenance plan and the periodicity of the maintenance plan.*	
704	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** In Annex II, Part 1, Table II 'Annual and five-year maintenance programme for active fire protection systems' The row for 'Equipment or system: Dry column systems Column: Maintenance every five years 'Proof of installation under reception conditions'	**It is proposed to change:** 'Proof of installation under reception conditions' **Replace with:** The test referred to in point 6 of Part 1 of Annex 1 Dry column systems section 4 will be carried out. **Justification:** The design requirements, installation of dry columns are specified in paragraph 6 of the first section of Annex 1, and does not specify at any time the tests to be carried out under system reception conditions and there is currently no UNE standard.	R. It is understood that the current text is sufficiently clear (receiving/commissioning is part of the installation process). The change of reference in the text would have no practical effect.
705	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** In Annex II, Part 1, Table II 'Annual and five-year maintenance programme for active fire protection systems' The row for 'Equipment or system: Fixed extinguishing systems:	**It is proposed to replace the phrase:** 'Proof of installation under receipt conditions' **Replace with:** In gaseous extinguishing agents, every 10 years, or when the room is observed to have been modified, leakage or leakage is observed during annual maintenance operations; the test indicated in Annex E of standard UNE-EN 15004-1 will be carried out. **Justification:** The high cost of carrying out this test prevents users from carrying out such tests, thus we deem it appropriate to perform them with the same periodicity of the pe-	PA. The wording is changed to be more precise and proportional about the operations to be performed. However, the wording changed does not entirely coincide with the proposal of the submission.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		Gaseous extinguishing agents Column: Maintenance every five years Proof of installation under the receipt conditions.	riodic inspections determined by the RIPCI, the rest of the operations indicated in reception conditions have been specified as quarterly or annual operations of 23580-8.	
706	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** In Annex II, Part 1, Table II 'Annual and five-year maintenance programme for active fire protection systems' The row for 'Equipment or system: Fixed extinguishing systems: **Physical foam** Column: Maintenance every five years In fixed foam extinguishing systems, determination of the coefficient of expansion, drainage time and concentration, according to the corresponding part of standard UNE-EN 1568, of a representative sample of the installation. The values obtained must be within the values allowed by the manufacturer	**It is proposed to amend:** In fixed foam extinguishing systems, determination of the coefficient of expansion, drainage time and concentration, according to the corresponding part of standard UNE-EN 1568, of a representative sample of the installation. The values obtained must be within the values allowed by the manufacturer Replace with: In fixed foam extinguishing systems, tests of foam condition will be carried out, in laboratory accredited or by the manufacturer, determination of the coefficient of expansion, ... **Justification:** The operations of determining the coefficient of expansion, drainage time and concentration are requirements of manufacture of the product according to standard UNE-EN 1568, according to the tests carried out by the manufacturer in accredited laboratories or in its own laboratories if it has them, therefore the only way to determine if the foam-generating substance these requirements is to analyse it in laboratories.	R. It is understood that the above text is sufficiently clear and does not require further details.
707	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** In Annex II, Part 1, Table II 'Annual and five-year maintenance programme for active fire protection systems' The row for 'Equipment or system: **Condensed aerosols** Column: Maintenance every five	**It is proposed to replace the phrase:** 'Proof of installation under receipt conditions' **Replace with:** In condensed aerosols, every 10 years, or when the room is found to have been modified, leakage or leakage is observed during annual maintenance operations; the test indicated in Annex E of standard UNE-EN 15004-1 will be carried out. **Justification:** The high cost of carrying out this test prevents users from carrying out such tests, thus we deem it appropriate to perform them with the same periodicity of the periodic inspections determined by the RIPCI, the rest of the	PA. The wording is changed to be more precise and proportional about the operations to be performed. However, the wording changed does not entirely coincide with the proposal of the submission.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		years	operations indicated in reception conditions have been specified as quarterly or annual operations of 23580-13.	
708	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** In Annex II, Part 1, Table II 'Annual and five-year maintenance programme for active fire protection systems' The row for 'Equipment or system: **Water mist** Column: Maintenance every five years	It is proposed to replace the phrase: 'Proof of installation under receipt conditions' Replace with: 'Water-mist systems will be subject to validation of the pressure and flow of water supply and free passage to all nebulising nozzles using alternative means (e.g. pump flow/pressure test and pipe blowing to demonstrate that all outlets are cleared. **Justification:** According to paragraph 8.2 of Standard UNE-EN 14972-1:2021, the test of the water-mist system must be carried out by means of a series of operations. Among which is the verification of the actual conditions of the installation. For which, we must perform a check of flow and pressure, in addition to ensuring the correct operation of the nebulising nozzles, as indicated by the standard. In view of this, we consider it important that the proposed text be included in Table II of the Regulation. The remaining transactions indicated under receipt conditions have been specified as quarterly or annual transactions of 23580-11.	PA. The wording is changed to be more precise and proportional about the operations to be performed. However, the wording changed does not entirely coincide with the proposal of the submission.
709	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	**Fifth final provision. *Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May*** In Annex II, Part 1, Table II 'Annual and five-year maintenance programme for active fire protection systems' The row corresponding to 'Equipment or system: automatic sprinklers Column: Annual maintenance. Note: systems incorporating pressure components falling within the scope of the Pressure Equipment Regulation, approved by Royal Decree 2060/2008, of 12 December, will be subjected to the tests established in	It is proposed to amend: Note: systems incorporating pressure components falling within the scope of the Pressure Equipment Regulation, approved by Royal Decree 2060/2008, of 12 December, will be subjected to the tests established in that regulation with the periodicity specified therein. **Replace with:** Note: systems incorporating pressure components falling within the scope of the Pressure Equipment Regulation approved by Royal Decree 809/2021, of 21 September, will be subjected to the tests established in that regulation with the periodicity specified therein. Justification: The text is proposed to modify the indicated row in such a way that reference is made to the current Pressure Equip-	R. Royal Decree 2060/2008 has been replaced with Royal Decree 809/2021 of 21 September. However, it is not necessary to explicitly change all references in other RDs already published in the Spanish Official State Gazette that refer to it, since the reference to the current RD should be considered automatically.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		that regulation with the periodicity specified therein.	ment Regulation.	
710	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	ripci- Annex II Part 1 Table II 'Annual and five-year maintenance programme of active fire protection systems' Row: Equipment or system: Fire extinguishers. Five-year operations ' Carry out a level C test (tipped), in accordance with the provisions of Annex III, of the Pressure Equipment Regulation approved by Royal Decree 2060/2008, of December 12. From the date of stamping of the extinguisher (and for three times) the extinguisher will be renamed in accordance with Annex III to the Pressure Equipment Regulations.'	It is proposed to change: ... of the Pressure Equipment Regulation approved by Royal Decree 2060/2008, of December 12. Replace with: Carry out a level C test (tipped), in accordance with the provisions of Annex III, of the Pressure Equipment Regulation approved by Royal Decree 809/2021, of 21 September **Justification:** The text is proposed to modify the indicated row in such a way that reference is made to the current Pressure Equipment Regulation.	R. Royal Decree 2060/2008 has been replaced with Royal Decree 809/2021 of 21 September. However, it is not necessary to explicitly change all references in other RDs already published in the Spanish Official State Gazette that refer to it, since the reference to the current RD should be considered automatically.
711	Superior Council of the Colleges of Architects of Spain	In the fifth final provision of the RSCIEI project, on 'Amendment of the Regulation on fire protection facilities, approved by Royal Decree 513/2017, of May 22.'	It is proposed to include in this Royal Decree the aspects indicated in the UNE standards that refer to: General criteria for the formal preparation of documents constituting a technical project indicated in Standard UNE 157001:2004. Aspects affecting the design of fire detection and alarm systems indicated in Standard UNE 23007, fire water supply systems in Standard UNE 23500, fire-hydrant systems in UNE-EN 14384 and UNE-EN 14339, hoses in Standard UNE 23091, Fittings in Standard UNE 23400, fire-hydrant system equipped in Standard UNE-EN 671, fixed automatic sprinkler extinguishing systems and sprayed water in Standards UNE-EN 12845 and UNE-EN 12259, UNE 23503, fixed water extinction systems in UNE-EN 14972, fixed physical foam extinguishing systems in UNE-EN 13565, fixed dust-extinguishing systems in UNE-EN 12416, fixed gaseous agent extinguishing systems in Standard UNE-EN 15004, fixed aerosol extinguishing systems condensed in the UNE-EN 15276 Standard, smoke and heat control systems in UNE-EN 23584 and UNE-EN 12101, fixed extinguishing systems in commercial kitchens in Standard UNE-EN 17446 and lumi-	R. The 2017 regulations, as it is written, have proven to work correctly and the citations to standards have been made when they have been deemed necessary. Changing this way of functioning would involve making major changes in this that evade the purpose of this RD and that, in any case, would not be necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			nescent signalling systems in Standard UNE-EN 23035. This way, all aspects relating to the design of the establishment could be established without having to resort to limited access rules.	
712	particular	CTE Section III 'General criteria of application' of the 'Introduction' of the Basic Document DB-SI 'Security in the event of fire', in the text *'In any event, buildings or establishments for use Warehouses intended for mini warehouses under rental or community of owners will be considered, for the purposes of the application of these conditions, establishments of average intrinsic risk, unless the storage height exceeds 3 m, in which case they are considered to be of high intrinsic risk'.*	The subclassification of their intrinsic risk level (3, 4 or 5 for medium risk, and 7 or 8 for high risk) is not specified for the purpose of determining construction and endowment requirements. I understand that the project executor must determine the fire load density, weighted and corrected, as set out in sections 3.2.1, 3.2.3 or 3.2.4. In case of opting for the calculation of Qs from the fire load density data of the storage areas, would it be possible to assign the QVI value specified in Table 1.5 for 'Storage (generic)' or 'Storage of household products'?	PA. The text has been changed. Below 3 m of storage height a medium intrinsic risk will be assigned. Above it, reference will be mace to the calculation in the table.
713	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Sixth Final Provision of the Royal Decree, point one 'One. In point I "Object" of the "Introduction", note (1) is deleted.'	It is requested to clarify whether the *parking use* of the CTE DB-SI includes the parking of vehicles intended for the transport of persons or goods, as well as the parking of all types of vehicles (ambulances, municipal brigades, caravans, heavy vehicles, etc.)	A. The use of DBSI parking covers car parking attached to a building except car parks attached to the building of an industrial establishment. In any event, the occupancy density of these car parks is specified within Table 2.1 of Part SI3 of DBSI
714	Professional Association of Fire Technicians (APTB)	Sixth final provision One. In point I 'Subject matter' of the 'introduction', note (1) is deleted.	Note (1) states the following: For these purposes, it should be borne in mind that areas of industrial use are also considered as areas of industrial use: a) Storages integrated in establishments of any non-industrial use, when the total, weighted and corrected fire load of such storages, calculated in accordance with Annex 1 to that Regulation, exceeds $3x10^6$ MJ. However, when the presence of the public is anticipated in these, the conditions that this CTE establishes for the corresponding use must also apply to them. ***b) Garages for vehicles intended for the transport of per-***	C. These car parking meet the definition of parking use in the annex of DBSI terminology. There is no need to make changes to the text.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			sons or goods. If section (b) is deleted, how will the fire protection conditions of an industrial building where the coaches of a passenger or goods transport company are stored? If it is no longer treated as an industrial storage use, should the use of CTE's DBSI parking be applied? I believe that you cannot compare a garage of a building for a commercial, administrative or housing use with a warehouse to store trucks intended for the transport of goods and people. The same would happen with an industrial building where vehicles are parked, in which only the operators of the establishment enter, for example a warehouse where rental vehicles are stored.	
715	Superior Council of the Colleges of Architects of Spain	Sixth final provision. *Amendment of the Basic Document DB-SI 'Security in the event of fire' of the Technical Building Code, approved by Royal Decree 314/2006, of March 17.* *'One. In point I "Object" of the "Introduction", note (1) is deleted.'*	With the deletion of that note, *'(1) For these purposes, it should be borne in mind that areas of industrial use are also considered as areas of industrial use:* a) Storages integrated in establishments of any non-industrial use, when the total, weighted and corrected fire load of such storages, calculated in accordance with Annex 1 to that Regulation, exceeds 3x106 MJ. However, when the presence of the public is anticipated in these, the conditions that this CTE establishes for the corresponding use must also apply to them. b) Garages for vehicles intended for the transport of persons or goods [(1) RD 1000/2010 *on compulsory collegiate visa* Article 2(a) Project for the execution of construction. For this purpose, 'building' will mean the provisions of Article 2.1 of Law 38/1999, of 5 November, on the Building Regulations. The visa requirement applies to works requiring a project in accordance with Article 2.2 of that law.] With regard to the deletion of section (a), the comments are further elaborated below. However, it is noted that the DB SI has recurring comments in relation to warehouses of more than $3x10^6$ MJ of fire load and the application of the	C. Notes in which establishments of more than 3 million MJ are sent to the RSCIEI are deleted. The definition of parking covers this type of garage, the only reason why they were not in the scope of DBSI until now is that they were explicitly within the scope of RSCIEI.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			RSCIEI which must all be deleted with the publication of this amendment. With regard to section (b), the regulation of safety regulations in the event of fires for such activities remains indefinite. Neither the amendment of the Technical Building Code contained in this sixth final provision, nor in the new wording of the RSCIEI clearly covers this situation, which can be said to be very recurrent. If these uses are covered by the use of parking, this should be indicated by amending the definition or if, on the contrary, the RSCIEI should still be more clearly defined in its scope. If this is the first case, it is understood that the comment of the CTE on the terminology in relation to these activities will be deleted, but due to the long history of its justification through the RSICIEI needs further clarification. It is also noted that after the deletion of this comment by introducing warehouse use, the treatment of storage spaces for commercial uses may be uncertain.	
716	IETcc	Sixth Final Provision, Two, point 5.	A definition of the term 'mini-warehouse' is missing. It should also be noted that the limitation to a height of 3 m of storage makes it impossible for these warehouses to be present in type A buildings, which is currently possible.	PA. The has been amended to be more precise with regard to the type of stabilisation being regulated. On the impossibility of installing this type of establishment in a building with other establishments vertically, this limitation is due to the level of intrinsic risk that is estimated in this type of establishment
717	IETcc	Sixth Final Provision, Two, point 6.	The wording is confusing, and does not identify the specific scenario that you want to regulate. First, the need to exclude industrial use from its application is not understood, as it is not within the scope of DB SI. The reference to the RSCIEI for the calculation of the fire load implies the necessary data will be found in that regulation. Instead, the fire load value table has undergone a major cut, and does not include much of the necessary data. A definition of the term 'non-free height' is missing. As regards the requirement itself, if the three conditions are	PA. The text is modified to solve the problems indicated.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			not met simultaneously: expected occupancy, fire load and non-free height, this point would not be applicable, resulting in a regulatory non-definition in the event that two of them are met, such as the fire load and the expected occupation. We understand that the critical parameters to take into account are the charge of fire with the presence of the public, as they are in the current version, so that the reference to the 'not free height' would remain.	
718	GENERAL COUNCIL OF THE TECHNICAL ARCHITECTURE OF SPAIN, CGATE	Sixth final provision. Amendment of the Basic Document DB-SI 'Security in the event of fire' of the Technical Building Code, approved by Royal Decree 314/2006, of March 17. Two. Section III 'General criteria of application' of the 'Introduction' is amended as follows: The following points 5 and 6 have been added after point 4: (...)	It would be useful to clarify the definition of non-free storage height, using the concept of net storage height (discounting the height not occupied by the stored materials). It should be clarified which regulations will apply, since affirming that the RSCIEI and DB-SI will be applicable will lead to contradictions and doubts in its resolution, because the RSCIEI provides solutions according to the level of intrinsic risk, while the DB-SI does so according to criteria less susceptible to subjective interpretation. Basically, points 5 and 6 refer to the same case: establishments other than industrial use with storage, specifying point 6 certain conditions depending on occupation.	PA. The term non-free storage height has been deleted, because it leads to confusion. Is replaced by 'storage height'. The text has been amended.
719	STATE AGENCY FOR RAILWAY SAFETY	The sixth final provision, number 2, it is proposed to amend the following text: *'6 In establishments other than industrial use (...)'*	The proposal is to refer to the dimensions of the premises according to Table 2.1., not to their occupation. Table 2.1 Classification of the premises and special risk areas integrated in buildings of the Basic Document DB-SI 3 refers to DIMENSIONS of the premises or area, to the S = constructed area or to the V = volume constructed, it is therefore not understood that the alteration refers to their occupation. Amending the paragraph as follows is proposed: *'6 In establishments for use other than industrial use* that *have storage areas whose total fire load, calculated according to RSCIEI Annex I, is equal to or greater than three million Megajoules, provided that its expected ~~its occupation~~* ***its dimension s*** *exceed the expected for files and stores in Table 2.1 of DB-SI 3... '*	PA. The definition of warehouse use has been amended, to make it compatible with special risk premises.
720	Service for Preventing and Extin-	Sixth final provision. Amendment of Basic Document DB-SI. Point Two	PROPOSAL: Define whether the car parks of caravans or motorhomes	C. Motorhome car parks are not buildings, therefore they are not within the

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
	guishing Fires and Rescue of the City of Vitoria-Gasteiz	New points 5 and 6 have been added to paragraph III, making it clear that mini-warehouses enter the RSCIEI	are 'warehouses' with respect to the RSCIEI or 'use parking' according to the DB-SI	scope of DBSI and are not within the scope of the RSCIEI. There is no need to make changes to the text.
721	Prevention Service of the Directorate-General for Preventing, Extinguishing Fires and Rescues, Government of Catalonia	Sixth Final Provision of the Royal Decree, point two, section 1 '1. The following points 5 and 6 have been added after point 4: "5. In establishments for *Warehouse use*, (...)	Considering that it is intended to sectorise certain subsidiary uses with respect to the new *Warehouse use*, considered as the main use of the establishment or building, an alternative wording for point 5 is proposed. It is also proposed to supplement point 6 to regulate the case of storage areas subsidiary to uses other than *Warehouse use* in which much fire load is accumulated. It is proposed to remove the reference to non-industrial uses as they do not fall under the CTE DB-SI regime. It is also proposed to remove the reference to the storage rooms of communities of owners so as not to confuse them with storage areas located in buildings or establishments of other uses than *Warehouse use*, which are treated as risk premises according to the CTE DB-SI. It is therefore proposed to replace sections 5 and 6 with: "5. In establishments of *Warehouse use*, compliance with the basic safety requirements in the event of fire will be carried out by applying Article 4(2) of the Regulation on Fire Safety in Industrial Establishments (RSCIEI) with regard to the compartmentalisation conditions in fire sectors of any area whose intended use is different and subsidiary from the *Warehouse use*, and the characterisation and constructive and endowment requirements set out in Annexes I, II, III, IV and V to that regulation. In any event, buildings or establishments of *use Warehouse* intended for rental mini-stores will be considered, for the purposes of the application of these conditions, establishments with sectors of average intrinsic risk, unless the height of the stored products exceeds 3 m, in which case they will be considered to be of high intrinsic risk. 6 In establishments for use other than *Warehouse use* that have storage areas whose height of the stored products exceeds 3.00 m and whose total fire load, calculated according to Annex I to the RSCIEI, is equal to or greater than three million Megajoules, these areas will constitute a different	PA. The wording of section 5 has been amended to address these problems. The mention of storage rooms of communities of owners has been deleted. The mention of establishments other than industrial use has been deleted. In any event, section 6 of the draft is corrected.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			fire sector and compliance with the basic safety requirements in the case of fire in them will be carried out by applying the characterisation and the constructive and endowment requirements set out in Annexes I, II, III, IV and V to that regulation. However, where the expected occupation in these areas exceeds that foreseen for archives and stores in Table 2.1 of DB-SI 3, the conditions laid down in the DB-SI will also apply to them.'	
722	CIVIL PROTECTION AND EMERGENCY SERVICE, GOVERNMENT OF NAVARRE	Sixth final provision. Two 1. Section 5.'In establishments other than industrial use...'	Clarify whether these establishments can also be applied to ***Article 5. Compliance with the requirements***	R. It is clear that they do not apply the requirements of the RSCIE to an establishment within the scope of DBSI unless specified by the DBSI, and in this case does not do so. There is no need to make changes to the text.
723	GENERAL COUNCIL OF OFFICIAL COLLEGES OF INDUSTRIAL TECHNICAL ENGINEERS AND INDUSTRIAL EXPERTS OF SPAIN	Sixth final provision. Amendment of the Basic Document DB-SI 'Security in the event of fire' of the Technical Building Code, approved by Royal Decree 314/2006, of March 17. Two. Section III 'General criteria of application' of the 'Introduction' is amended as follows:	In the sixth final Provision, point two, it makes it clear that any warehouse has to apply the new regulation (in Annexes I, II, III, IV and V), but that it is the case for the previous non-industrial warehouses that did not exceed the 3 million MJ which did not apply the annexes to Royal Decree 2267/2004, as this excluded them. The same goes for the 'mini-warehouse' or storage rooms, which have already been implanted and there is a alteration. It must be understood that the paper files are excluded from the regulation (provided that their expected occupancy is below that foreseen for files and stores in Table 2.1 of DB-SI 3, i.e. 40 m^2/person and their non-free storage height does not exceed 3.00 m), because they must be treated as risk premises, but the risk premises, are associated with an activity, so a logistic warehouse dedicated to the storage of paper, that its occupancy is less than 40 m^2/person and does not store in 3 m, perhaps, has a small office, if we apply Table 1.1. of the DBSI4, for administrative, active protection facilities, are scarce, for the office and its risk room, which would be the entire warehouse. Nothing talks about the CPDs that are currently being implemented as a single activity in the logistics industrial units (occupying the entire industrial unit).	C. The application of a regulation may not be retroactive, unless explicitly stated in it. On the other hand, on the following two paragraphs the text is deemed clear. CPDs (according to their specific case studies) are not within the scope of the RSCIEI either before or now. The location of a type of activity in a given building typology (the colloquially called 'industrial unit' in this case) does not determine whether or not it belongs to the scope of one regulation or another, the determining question is the activity for which it is intended.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
724	Civil Protection Service, Fire Prevention and Extinction, Barcelona City Council	Sixth Final Provision of the Royal Decree, point two, section 1 '1. The following points 5 and 6 have been added after point 4: (...)	Considering that it is intended to sectorise certain subsidiary uses with respect to the new *Warehouse use*, considered as the main use of the establishment or building, an alternative wording for point 5 is proposed. It is also proposed to supplement point 6 to regulate the case of storage areas subsidiary to uses other than *Warehouse use* in which much fire load is accumulated. It is proposed to remove the reference to non-industrial uses as they do not fall under the CTE DB-SI regime. It is also proposed to remove the reference to the storage rooms of communities of owners so as not to confuse them with storage areas located in buildings or establishments of other uses than *Warehouse use*, which are treated as risk premises according to the CTE DB-SI. It is therefore proposed to replace sections 5 and 6 with: "5. In establishments of *Warehouse use*, compliance with the basic safety requirements in the event of fire will be carried out by applying Article 4(2) of the Regulation on Fire Safety in Industrial Establishments (RSCIEI) with regard to the compartmentalisation conditions in fire sectors of any area whose intended use is different and subsidiary from the *Warehouse use*, and the characterisation and constructive and endowment requirements set out in Annexes I, II, III, IV and V to that regulation. In any event, buildings or establishments of *Warehouse use* intended for rental mini-stores will be considered, for the purposes of the application of these conditions, establishments with sectors of medium intrinsic risk, unless the storage height exceeds 3 m, in which case they will be considered to be of high intrinsic risk. 6 In establishments for use other than *Warehouse use* that have storage areas whose height of the stored products exceeds 3.00 m and whose total fire load, calculated according to Annex I to the RSCIEI, is equal to or greater than three million Megajoules, these areas will constitute a different fire sector and compliance with the basic safety requirements in the case of fire in them will be carried out by applying the characterisation and the constructive and endow-	PA. The first part of section 5 is accepted. The mention of storage rooms of communities of owners has been deleted. The mention of establishments other than industrial use has been deleted. In any event, section 6 of the draft is corrected.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			ment requirements set out in Annexes I, II, III, IV and V to that regulation. However, where the expected occupation in these areas exceeds that foreseen for archives and stores in Table 2.1 of DB-SI 3, the conditions laid down in the DB-SI will also apply to them.'	
725	Professional Association of Fire Technicians (APTB)	Sixth final provision. Amendment of the Basic Document DB-SI 'Security in the event of fire' of the Technical Building Code, approved by Royal Decree 314/2006, of March 17. Two. Section III 'General criteria of application' of the 'Introduction' is amended as follows: 5. In establishments for Warehouse use, (...)	To mini-warehouses under rental or community of owners that are classified as an average intrinsic risk should be added to the text if it is average 3, 4 or 5. This subclassification is essential to establish its maximum area of the sector. And for those with high intrinsic risk if they are 7 or 8.	A. Subclassification has been incorporated into the text.
726	Professional Association of Fire Technicians (APTB)	Sixth final provision. Amendment of the Basic Document DB-SI 'Security in the event of fire' of the Technical Building Code, approved by Royal Decree 314/2006, of March 17. Two. Section III 'General criteria of application' of the 'Introduction' is amended as follows: *In establishments other than for industrial use (...)*	By having the DBSI a new use, Warehouse use, we believe that the paragraph confuses. At the beginning of the paragraph,instead of saying: 'In establishments other than industrial use that have storage areas...' It should be said not to confuse: 'In establishments that are not for *Warehouse* use that have storage areas...' The term 'non-free storage height' should be defined We assume that it refers to storage height, so I think that, in order not to complicate it, 'storage height' should simply be indicated.	A. Both wordings have been amended. The term 'non-free storage height' is replaced by 'storage height'
727	particular	Sixth final provision. Amendment of Basic Document DB-SI. Two. New point 5 of Section III of the 'Introduction'	1) See submission prior to point Four. If, as proposed in it, the 'Warehouse Use' is not incorporated into the DB-SI, the details and details of its regulation in the RSCIEI are more in the DB-SI. Move to RSCIEI. 2) On the other hand, with the application of point 5 according to its current content, the reference to Article 4 of the RSCIEI of the regulation of the establishments of the new Warehouse Use of the DB-SI can 'fall into vacuum' when it is not the case referred to in Article 4, that is to say, when the Warehouse Use in question **does not coexist** in the same building with an industrial activity. In such a case, Article 4	1) R. It is deemed necessary to regulate a 'warehouse use' in DBSI to avoid regulatory loopholes. 2) PA. The wording of the section has been corrected. 3) R. It is deemed that establishments intended for this use do not have the nature of industrial establishments.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			of the RSCIEI would not apply and it is not known what should be done. 3) The details of what intrinsic risk to assign to mini-stores, including the very definition of what a 'mini-warehouse' is missing, is something that corresponds to the RSCIEI, not the DB-SI. In view of the above, it is proposed to delete the new point 5.	
728	particular	Sixth final provision. Amendment of Basic Document DB-SI. Two. New point 6 of Section III of the 'Introduction'	1. DB-SI's current referral to RSCIEI of those storage areas with $Q_F > 3x10^6$ MJ belonging to non-industrial establishments is replaced, with the new point 6, by a simultaneous application of both regulations when the occupation of these areas exceeds one person/40 m² (not when they have public presence, as now established by the DB-SI, which implies a greater occupancy) and when the storage height 'non-free' (?) exceeds 3 m. Apart from the fact that it is not clear what is meant by 'non-free' storage height, nor what happens when said height is 'free' (1), the result of the new point 6 is that, contrary to what is currently happening, if there is no occupancy indicated, that is, if there is the own of a warehouse (one person/40 m²) the regulation would no longer be referred to the RSCIEI but would remain in the DB-SI. By way of example, large warehouses of products (without public) attached to a 'Carrefour', a 'Alcampo', a 'Decathlon', etc. that were currently forwarded to the RSCIEI, would be regulated exclusively by the DB-SI. It is not clear whether such an objective is actually sought by the drafters of the Provision, or whether it is rather the result of somewhat uncontrolled wording. In any event, and given the doubt that it is the latter, the most prudent thing is to delete point 6 and leave things as they are. (1) Experience shows that making a regulatory requirement depend on two conditions, one positive and the other negative, usually leads to headaches at the time of application. Which one has to be positive and which one can be negative? If, as in this case, the conditions are not two but three (occupation, storage height, etc. and the free/not free char-	PA. The wording of the draft has been amended, which responds to both parts of this submission. With the new wording provided, it is understood that the text is adequate.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			acter of said height) the crossing of cases can already raise a whole sea of doubts. 2. The term *'expectable occupation'* is unsuitable from the regulatory point of view. If point 6 is maintained, it is proposed to delete the word *'expectable'* since the occupation is sufficiently precise as the *'predicted for files and warehouses in Table 2.1 of DB-SI3...'*	
729	particular	Sixth final provision. Amendment of Basic Document DB-SI. One.	See above submission. If, for the above reasons, the new point 6 is deleted, point One of the Provision should also be deleted and thereby retain the note (1) of paragraph I 'Subject' of the 'Introduction' of the DB-SI.	R. Not accepted. The proposed text is deemed appropriate.
730	General Secretariat for Industry and Mines, Government of Andalucía	Sixth Final Provision, Two. New points 5 and 6 of section III of the DB-SI.	The reference in both section to Article 4 of the RSCIEI appears to be an error in dealing with that article of regulatory compatibility.	PA. The reference to Article 4 is corrected.
731	Superior Council of the Colleges of Architects of Spain	two. 'Section III "General criteria of application" of the "Introduction" is amended as follows: 1. The following points 5 and 6 have been added after point 4: "***5*** In establishments for Warehouse use, (...)	In the new Point 5 section of *General criteria of application* does not mean the mention of communities of owners when reference is made to a specific type of warehouse 'mini warehouses under rental' for the purpose of establishing their level of risk. Storage rooms of owners of residential residential buildings should not be included in the 'Warehouse Use' which in the same definition in the Annex of Terminology only refers to complete buildings or establishments. The storage rooms of communities of owners do not have the status of establishment, and this same definition does not give rise to include them. They are a part of a building with a subsidiary use to residential housing and should continue to be treated as special risk premises as shown in *Table 2.1 Classification of premises and special risk areas integrated in building* of Part 1 of DB SI. Considering the storage rooms of communities as a warehouse use, and consequently granting them an average risk, would limit very common layouts involving storage rooms located on floors below the basement minus one. For the above **the mention of the communities of owners**	1. A. The reference to owner communities related to rental dealers is deleted. 2.A. The subclassification of the intrinsic level of risk is clarified. 3. C. Regarding the impossibility of installing this type of establishment in a building with other establishments vertically, this limitation is due to the level of intrinsic risk that is estimated in this type of establishment. 4. C. The DBSI defines in terminology precisely what is a low level sector. 5. A. The wording of section 6 has been amended.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			should be reconsidered. With a view to establishing the maximum constructed area of the sector in Table 2.1.1 MAXIMUM ADMISSIBLE CONSTRUCTED SURFACE AREA OF EVERY FIRE SECTOR It would be useful to clarify the numerical grade 1 to 6 (within medium or high), to which this medium or high risk allocation corresponds. ----- Table 2.1.2 FIRE RESISTANCE OF BUILDING ELEMENTS DELIMITING FIRE SECTORS) In line with the characterisation of warehouse use establishments, it turns out that an assiduous typology of warehouse rental establishments is usually Av, and in basement or semi-basement floors (in commercial premises). Does the ban on these establishments involve PB or P Basement premises? It would also be interesting to clarify from what level is deemed basement. There are cases of semi-basements that can lead to doubt of application. ----- Value or a new definition or clarification in comments on retail or wholesale commercial establishments, in which the sales area is the storage area itself. If only storage is considered in accordance with RSCIEI, or its requirements are defined by DB-SI As regards the point 6, the proposed wording is very difficult to understand. It is understood that in order for DB SI and additionally the RSCIEI to be applicable, three conditions must be met at the same time: total fire load exceeding three million Megajoules, occupancy density exceeding 40 m^2/person and non-free storage height exceeding 3 m. It is assumed that the last condition refers to storage areas with storage shelves with a height of more than 3m, since they present a higher risk than areas with lower storage volume and their characteristics are more typical of industrial use. However, this reading is an assumption and it is not apparent from the wording that rather seems to be linked to	

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			the free height of storage in relation to the total free height of the plant (between concrete slab and concrete slab/beam and roof, etc.). It appears from the overall reading of the application criteria, that regardless of the surface area and the fire load it may accumulate, a non-industrial warehouse will always apply the CTE if the occupancy limit set by table DB occupancy density SI warehouse is not exceeded. On the contrary, this same warehouse located in a separate building, would apply to it 'the use of warehouse' which refers in relation to fires to the Annexes of the RSCIEI referred to in point 5. If so, this change should not lead to substantial differences in the regulatory requirements applicable to the same warehouse. It can be assumed that the legislator has already carried out the appropriate verifications. Given the significant alteration represented by the fact that the warehouses of more than 3 million Mega Jules cease to be regulated by the RSCIEI and the inertia it has been implemented, it is reiterated that it would be necessary to add in the same point 6 as to proceed in the remaining cases. It could assist in the compression of the articles that point 6 starts by indicating that in general terms the storage areas of establishments of non-industrial use should be treated as special risk premises on the basis of the CTE, with the exception of warehouses that meet the above three considerations that the RSCIEI would also apply to them.	
732	Superior Council of the Colleges of Architects of Spain	In the sixth final provision of the RSCIEI project on 'Amendment of the Basic Document DB-SI 'Security in the event of fire' of the Technical Building Code, approved by Royal Decree 314/2006, of March 17.' In section Two.1, which reads as follows: '5 In establishments for use Warehouse, compliance with basic security requirements...'	This refers to Article 4 of the RSCIEI on regulatory compatibility, and it is not fully understood whether the warehouse use considers it industrial and whether the subsidiary activities mentioned in that article refer to the warehouse, treating the warehouse as industrial since in the terminology it introduces this new term: 'Warehouse Use: Building or establishment intended for the storage of materials or products and not regarded as an industrial establishment in accordance with the RSCIEI.'	A. The reference to Article 4 is corrected.
733	particular	Sixth final provision. Amendment of	Since this is DB-SI, it is obvious that the above-mentioned	1. A. The first part of the submission is

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		Basic Document DB-SI. Three. Points 1, 2 and 3.	Table 2.1 enclosures belong to establishments regulated by the DB-SI, i.e. DB-SI uses. If, as proposed in the submission to point Four, the inclusion of Warehouse Use in the DB SI is deleted, the repeated clarification *'in establishments for use other than Warehouse'* would be out of place, so points 1, 2 and 3 should be deleted.	accepted. The draft public hearing specified the requirements of special risk premises in uses other than the new Warehouse Use and that mention, as the submission indicates, is not necessary because the table of special risk premises will not be used to define the requirements of these areas of Warehouse Use since their requirements will be established, by reference from the DBSI, in the RSCIEI. 2. R. The second part of the submission is not accepted because it calls for the deletion of the new Warehouse Use in the alteration of DBSI and the inclusion of the new use is deemed correct.
734	FEDAOC	Sixth Final Provision and Article 3(b) of the Regulation. Definition of non-industrial warehouses.	Although Article 3(b) of the RSCIEI provides a very clear definition of industrial storage, the treatment given to storage in the sixth final provision amending the CTE DB-SI is very confusing. On the one hand, Annex A terminology states: 'Warehouse use: Building or establishment intended for the storage of materials or products and not regarded as an industrial establishment in accordance with the RSCIEI.' These establishments can be: deposits for works of art, documents of various kinds, buildings of archives of the administration... On the other hand, in point 5 of Section III of the general criteria for the application of the introduction, it states that in establishments of warehouse use the characterisation and construction requirements and endowments will be those laid down in Annexes I, II, III, IV and V to the RSCIEI. It is contradictory that in an establishment of non-industrial warehouse use, all the technical conditions of the RSCIEI have to be applied but do not have to be subject to periodic inspection. With regard to mini-warehouses, we understand that it can be very difficult to apply in communities of owners as they are usually storage areas located in basements of housing	1. A. The definition of warehouse use has been nuanced. 2. R. The requirements of establishments with similar risks are matched. As regards inspections of DBSI buildings, these are all subject to a different regime than industrial establishments, not just warehouses. 3. A. The reference to owner communities related to rental dealers is deleted. 4. A. The wording of section 6 has been amended.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			buildings (Av layout, the most unfavourable one and the one that can lead to the most technical difficulties). And in point 6, dedicated to warehouses in establishments other than industrial use, it leaves without adequate protection for a large number of such warehouses. In order to apply the technical conditions of the RSCIEI, all three conditions must be met simultaneously: Fire load exceeding 3 000 000 MJ Occupancy greater than one person/40 m² Storage height exceeding 3m This can lead to an adequate lack of protection of these warehouses (e.g.: a large reserve of diverse material without staff). In addition, warehouses meeting the above three requirements are required to comply simultaneously with the technical conditions of the RSCIEI and CTE DB-SI. Conflicting requirements may be required. It is proposed: Remove from point 5 the mention of mini-warehouses in communities of owners. Keep within the RSCIEI those warehouses of a fire load greater than 3 000 000 MJ without additional requirements	
735	particular	Sixth final provision. Amendment of Basic Document DB-SI. Four.	A new use, the 'Warehouse Use', is incorporated into the DB-SI, but by the new point 5 of section III, its regulation refers entirely to the RSCIEI, so that such incorporation into the DB-SI is apparent, rather than real, in addition to unnecessary and disconcerting. It is not known what this is for. It probably responds to the interests of the MICT, but certainly not those of the users. For this reason, it is proposed to delete point Four and thereby to incorporate it.	R. It is deemed necessary to regulate a warehouse use within the DBSI in order to avoid regulatory gaps and to match these requirements with those of establishments that involve similar risks, such as industrial storage.
736	Professional Association of Fire Technicians (APTB)	Sixth final provision. Text of DBSI: Floor exit It is one of the following elements, may be located either in the plant considered or on a different floor: ***The start of an unprotected stair-***	In the sixth fine provision, where the amendments to the DBSI of the CTE are proposed, the term 'Floor Exit' in Annex SI A should also be amended, since in these regulations it is envisaged that the start of a ladder that is not protected or sectorised is output from the floor and, however, in the new RSCIEI it is not allowed that a ladder that is not protected or compartmented is output from the floor. The requirement made in the new RSCIEI is very logical and	A. The definition has been amended.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		case *leading to an exit floor of the building, provided that the area of the forging gap does not exceed the floor surface area of the staircase by more than 1.30 m².* Text of the new RSCIEI: Point 3.3. Protection of stairs and corridors **In the event that between two floors there are unprotected stairs and that such stairs are not compartmentalised, <u>these will not be deemed floor exit</u> for the purpose of computing evacuation routes.**	reasonable, but that in the two regulations establishing the conditions of fire protection in buildings, this requirement is not very meaningful. **It is proposed, and since alterations will be made to the DBSI, to eliminate the possibility that a ladder that is not compartmentalised or protected can be deemed a floor exit.** This alteration, in addition to being much more consistent with the sense of fire protection in buildings, due to the enormous danger of an evacuation ladder of people who are not protected or compartmentalised, due to the chimney effect of smoke through them, would also eliminate many interpretation problems in the DBSI.	
737	particular	Sixth final provision. Amendment of Basic Document DB-SI.	The summary of all the above submissions to the various paragraphs of the Sixth Final Provision is that this provision should be deleted.	R. Not accepted. It is understood that the proposed text is appropriate.
738	Superior Council of the Colleges of Architects of Spain	Sixth final provision amending the Technical Construction Code *Section II 'Scope' of the 'Introduction'* note (1): '*In accordance with that regulation, in turn, the fire protection conditions of areas of industrial establishments intended for other use and exceeding certain limits will be those established by the basic building standard NBE-CPI/96. In that reference, that basic standard must be understood to be replaced by this DB SI of the CTE.'*	The wording of that note should be amended as regards consistency with the update of the RSCIEI, since it no longer required clarification regarding the basic building standard NBE-CPI/96	PA. It is not necessary to modify the note, but to delete it.
739	particular	Seventh final provision. Amendment of the Order of 27 July 1999 determining the conditions to be met by fire extinguishers installed in vehicles for the transport of persons or goods	Mandatory fire extinguishers in freight vehicles have not taken into account the amendment made by Order PRE/52/2010 of 21 January amending Annexes II, IX, XI, XII and XVIII to the General Vehicle Regulation, approved by Royal Decree 2822/1998 of 23 December. Annex XII to that order exempts vehicles of less than 3 500 kg from carrying extinguishers.	A. The wording of the Provision amending the Order of 27 July 1997 determining the conditions to be met by fire extinguishers installed in vehicles for the transport of persons or goods has been changed. The sections of section 2(b) are adapted.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			Was it an error, or is Order PRE/52/2010 of 21 January been repealed?	
740	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	Seventh final provision. *Amendment of the Order of 27 July 1999 determining the conditions to be met by fire extinguishers installed in vehicles for the transport of persons or goods* The classification of fire extinguishers is established in accordance with standard UNE-EN 3-7, according to the Fire Protection Facilities Regulation, of which extinguishers must comply with all product requirements. On the other hand, the requirements for installation, commissioning, inspection or maintenance will not apply to them, replacing the above, with the following requirements: Once placed, they must be monitored on a regular basis by the owner of the vehicle or another designated person, to verify their correct condition. In addition, every five years the fire extinguisher will be stamped (or renamed) as set out in Table II of Annex II to the Fire Protection Facility Regulation.	**Cancel paragraph:** ...the requirements for installation, commissioning, inspection or maintenance will not apply to them, replacing the above, with the following requirements: Once placed, they must be monitored on a regular basis by the owner of the vehicle or another designated person, to verify their correct condition. Replace with: ...the requirements for installation, commissioning and inspections will not apply to them. Regarding maintenance, the operations in Table I of the regulation can be carried out by the owner of the vehicle or another designated person, to verify its correct condition, being carried out the maintenance operations Table II per maintenance company qualified. **Justification:** We understand that he does not review the extinguishers per authorised company, goes against the safety of passengers users in passenger transport vehicles, as well as the safety of the transport of goods, in order to be able to review a extinguisher, a company is required to have a quality system, competent expert in staff, authorised operator, civil liability insurance and machinery and tools for this maintenance	PA. Part of the text is changed to make it more accurate. It should be noted that the maintenance tables of the RIPCI (especially Table I) are designed for fixed buildings and facilities, but not for vehicles, which have a different casuistry.
741	AERME, Spanish Association of Companies Installing and Maintaining Fire Protection Equipment and Systems	Seventh final provision. *Amendment of the Order of 27 July 1999 determining the conditions to be met by fire extinguishers installed in vehicles for the transport of persons or goods* "First. Without prejudice to what may be established in other specific regulations, extinguishers to be installed in newly registered vehicles, and those for replacement in other vehicles that are required by the	It is proposed to amend: "... being Your Burden Of Dry Dust» Replace with: "... , being the most suitable extinguishing agent for the fuel used and the components of the vehicle. **Justification:** Due to the wide variety of fuel types and vehicles on the market, we believe it is appropriate to point out that not all fires originating in such vehicles can be extinguished in the most effective manner by means of a dry dust extinguisher.	A. The wording is changed to include the use of other agents. However, it should be noted that the type of extinguishers cited (dry powder) is understood to be the most suitable and most widely used.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		General Vehicle Regulation to carry them, will be of a portable and manual type, being their load of dry dust. (...)		
742	AFEC (Association of Air Conditioning Equipment Manufacturers)	The following Supplementary Technical Instructions approved by Royal Decree 552/2019 of 27 September are amended as follows: One. The definition in Section 3.1.2 of Instruction IF-01, 'Terminology', is worded as follows: 'Semi-compact or split system: A cooling system comprising one or more factory-built indoor units in a factory-built space and one or more factory-built units located outside the space and connected on-site by refrigerant pipes in accordance with the manufacturer's instructions for factory-built units.'	Splitting the definition is proposed, since these are different equipment: 3. Definitions. 3.1. Refrigeration systems. 3.1.2. Semi-compact system. Refrigeration system built entirely in factory, on a metal bench or in a suitable cabin or enclosure; manufactured and transported in one or more parts, and in which no element containing refrigerant fluid is mounted on site, except interconnection valves and small sections of cold pipe. 3.1.2 (2) split or split system: Cooling, air conditioning or heat pump system, comprising one or more factory-built indoor units, in a factory-built space and one or more factory-built units located outside the space and connected on-site by refrigerant pipes in accordance with the manufacturer's instructions for factory-built units. Explanation: This new detachable definition already distinguishes between semi-compact and split and is included in the update of standard EN-378-1 2017+A1. This split is necessary to, among other things, separate the concept of split system (where, for example, the responsibility in the case of leaks in pipes is the installer, the construction is 'in-situ', etc.) and differentiates it from a semi-compact system (where the responsibility for leaks is the manufacturer, the construction is carried out entirely in the factory, etc.). The introduction has been added to the definition of split or split system in the standard: 'Cooling system, air conditioning or heat pumps,' for your better understanding.	PA. Given the impact on the regulation that splitting of the definitions might have, it is decided to maintain the current definition in Royal Decree 552/2019.
743	AEFYT	Eighth final provision. One. The definition in section 3.1.2 of Instruction IF- 01 "Terminology" is worded as follows: "Semi-compact or	According to this definition, it is not indicated whether they are several indoor units connected simultaneously to several external units which contribute to making the system more complex (risk of leakage) or several internal units indi-	PA. It returns to the current definition of the regulation.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		split system: Cooling system comprising one or more factory-built indoor units in one space and one or more factory-built units that are located outside the space and connected on-site by refrigerant pipes in accordance with the manufacturer's instructions for factory-built units"	vidually connected to their respective external units. It is proposed to use the definition of UNE EN 378-1:2017+A1:2021=**3.1.2 semi-compact system:** Refrigeration system built entirely in factory, on a metal bench or in a suitable cabin or enclosure; manufactured and transported in one or more parts and in which no refrigerant-containing element is mounted *in situ*, except insulation valves, such as interconnection valves.	
744	Fluid and Metrology Service, Ministry of Industry, Principality of Asturias	Eighth final provision, section three, paragraph 1b, in the text: '*Systems where the coolant load does not exceed 150 kg and does not exceed* ***1.5 m³*** *for refrigerants A2L*'	We understand that where it says *'1.5 m³' it should say '1.5 x m³'*	A. The proposal is accepted as a correction of a typographical error.
745	Fluid and Metrology Service, Ministry of Industry, Principality of Asturias	Eighth Final Provision, Part Three, Amending Appendix 4(1) of Instruction IF-04 'Use of Different Refrigerants'	It is proposed that the paragraph be redrafted: 1. General. Where the combination of classification and location access categories provided in Tables A and B of Appendix 1 of IF-04 allow for the use of alternative arrangements, the project executor may choose (for some of or all of the spaces occupied by the equipment) to calculate the permitted refrigerant charge by using the RCL, QLMV or QLAV values provided in Table A of this Appendix 4. All occupied spaces in which any part of the system containing coolant is located will be taken into account in calculating the permissible refrigerant load. These alternative provisions may be used only for occupied spaces, where all of the following conditions are met: a) The refrigerant of the systems is classified as safety class A1 or A2L according to Table A of Appendix 1 to IF-02. b) The refrigerant load of the systems does not exceed 150 kg or 1.5 × m_3 for A2L refrigerants. c) All system derivations (e.g. collectors or T-parts) and all changes in diameter (e.g. reducers) in pipes containing refrigerant in the occupied space are manufactured from factory-built fittings or collectors. d) If the systems are split, the design, dimensioning and selection of materials and components of pipes containing refrigerant installed on the ground, in the occupied space in	R. A translation of the content of standard UNE-EN378 is sought. The text does not need to be amended.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
			question, are in accordance with the instructions of the manufacturers of the factory-built units. e) The systems do not install valves (e.g. expansion, inversion or service valves) or service openings in the occupied space in question, with the exception of valves or service openings that are part of the factory-built units. f) The location of the system is type 2. g) The indoor unit-heat exchanger and system control are designed to prevent damage due to ice formation. h) Parts of the internal unit of the system containing coolant are protected against blower or the fan is designed to prevent it from breaking. i) In systems only permanent joints are used in the occupied space in question, except for joints performed 'in situ' to directly attach the inner unit to the pipe. j) The tubes that are installed in the systems and which contain the refrigerant in the occupied space in question are protected against accidental damage according to section 3.3 of IF-06 and section 3 of this Appendix. k) The alternative provisions provided in sections 2.2 and 2.3 of this Appendix are adopted to ensure safety. i) The doors of the occupied space are not airtight. the downstream effect is mitigated by applying section 2.4 of this appendix. Provided all the above conditions are met, the maximum leakage in the occupied space is assumed to be no greater than that resulting from a pore and the maximum charge is calculated on that basis.	
746	AFEC (Association of Air Conditioning Equipment Manufacturers)	The following Supplementary Technical Instructions approved by Royal Decree 552/2019 of 27 September are amended as follows: Three. Section 1 of Appendix 4 to Instruction IF-04, 'Use of different refrigerants', reads as follows: ... b) Systems where the refrigerant load does not exceed 150 kg and	Two changes are necessary in our opinion: 1.- Typo: The text should indicate 'do not exceed 1.5 x m^{3}' (an x must be added and the 3 should be subscripted when referring to 'm 3 = 130 m^3 x LII"). 2.- Two explanatory notes are required in section (e) ***e)*** *systems in which [1] valves are not installed (e.g. expansion, inversion or service valves) or service openings in the occupied space in question, with the exception of valves or service openings that are part of factory-built units[2].* ***1*** *except for cold circuit cut-off valves.*	PA. On the first comment, the text has been corrected. With regard to the text suggested in point (e), it is rejected as a clarification which, in any case, would be more appropriate to add it in a possible implementation guide if necessary.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		does not exceed 1.5 m^3 for A2L refrigerants. … e) Systems in which no valves (e.g. expansion, inversion or service valves) or service openings are installed in the occupied space in question, with the exception of valves or service openings forming part of the factory-built units	***2****including components that are part of the system provided by the manufacturer, e.g. expansion valves supplied by the manufacturer.* Explanation note 1: it is common practice to install cut-off valves to separate refrigerated circuits, either for sealing tests or to undertake the installation in stages, so cut-off valves (not to be confused with service valves) are common and necessary elements in refrigeration plants. Explanation note 2: although it is derived from the text, it is OK to clarify it just in case. There are factory-built units in which the expansion valve is 'outside the equipment' and is supplied by the same manufacturer, apart, for example, for areas of special demand in terms of the sound levels of the indoor units. (These same notes were in the original Excel we sent from AFEC, but they were not seen because they were at the end of the cell.)	
747	AFEC (Association of Air Conditioning Equipment Manufacturers)	INSTRUCTION IF-04 USE OF DIFFERENT REFRIGERANTS Appendix 4 Alternative for risk management in refrigeration systems in occupied spaces 3.3.2 Renewal openings (to dilute concentration) by natural convection. Air renewal openings will be provided at both the upper and lower levels. For these renewal openings, the sum of the areas at the upper level and the sum of the areas at the lower level will equal at least the determined area of the formula (7). This area can be divided into two or more openings in each high and low location, which in turn will be located close to the ceiling and floor respectively. If the ceiling is suspended and	Error in the coefficient of the formula. As indicated in **UNE-EN 378-3:2017+A1** 6.3.2 Renewal openings for dilution (air renewal openings for dilution for natural convection) A = **0.0032** × m/(QLMV × V) formula (2)	A. The proposal is accepted as a correction of a typographical error.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		the wall does not reach it in adjoining rooms, then the upper opening is not required. A = 0.032 × m/(QLMV × V) Formula (7)		
748	AEFYT	Eighth final provision. Three. Section 1 of Appendix 4 to Instruction IF-04, "Use of different refrigerants", reads as follows: safety conditions.' "1. General. ... b) Systems where the refrigerant load does not exceed 150 kg and does not exceed 1.5 m^3 for A2L refrigerants. c) Systems in which all bypasses (e.g. collectors or T-parts) and all changes in diameter (e.g. reducers) in pipes containing refrigerant in the space in question are manufactured from factory-built fittings or collectors. d) Systems that are split and in which the design, dimensioning and selection of materials and components of pipes containing refrigerant installed on the ground in the occupied space in question are in accordance with the instructions of the manufacturers of the factory-built units.	Cubic metres are indicated in the section and must indicate m sub three. b) Systems where the refrigerant load does not exceed 150 kg and does not exceed 1.5 x $m_3$for A2L refrigerants. In section (c) 'in factory' can be understood as if everything had to be prefabricated. It is proposed to change it to: systems in which all derivations (e.g. collectors or T-parts) and all changes in diameter (e.g. reducers) in pipes containing coolant in the occupied space in question are made of standard fittings or collectors, and grafts are not permitted in situ. On the other hand, as for the concept of 'occupied space', it does not seem appropriate, since we could find false ceilings or similar watertight structures outside the occupied space and watertight with very small volumes where the risk of gas accumulation was even greater. It should perhaps be changed at all points to 'occupied space or possible pipe passage areas through confined areas'.	PA. With regard to the first comment, the text has been corrected. For the rest of the submission, the content of standard UNE-EN 378 has been left.
749	AEFYT	Eighth final provision. Four. The following section 3.3 has been added to Instruction IF-14, 'Recurrent maintenance, reviews and inspections of refrigeration plants': '3.3. Inspections will be carried out in accordance with the procedures laid	Four. The following sections 3.3 and 3.4 have been added in Instruction IF-14, 'Recurrent maintenance, reviews and inspections of refrigeration plants': '3.3. Inspections will be carried out in accordance with the procedures laid down in standard UNE 192013 or other standards that provide an equivalent level of safety to this standard, in so far as it is not contrary to these regulations.'	R. It is not considered appropriate to add standard UNE 86013 revisions to the text. The wording of the initial proposal has been maintained.

No	PERSON/BODY	SECTION OF THE RD	COMMENTS	EVALUATION (A/PA/R/C)
		down in standard UNE 192013 or other standards that provide an equivalent level of safety to this standard, in so far as it is not contrary to these regulations.'	"3.4 The revisions will be carried out following the procedures established in standard UNE 86013 or other standards that provide an equivalent level of security to this, in everything that does not contradict these regulations."	
750	AEFYT	Eighth final provision Six. The list of standards in Instruction IF-21, "Relation of reference UNE standards", is amended as follows: 1. The following reference has been added to the table: "UNE 192013:2022, Procedure for regulatory inspection. Refrigeration plants."	Six. The list of standards in Instruction IF-21, "Relation of reference UNE standards", is amended as follows: 1. The following references have been added to the table: "UNE 192013:2022, Procedure for regulatory inspection. Refrigeration plants" "UNE 86013:2022, Procedure for regulatory revisions. Refrigeration plants	R. Standard UNE 86013 (seen in the previous submission) is not added, so it is not appropriate to add it to this list either.
751	AFEC (Association of Air Conditioning Equipment Manufacturers)	Text of the Royal Decree 552/2019 of 27 September: INSTRUCTION IF-07 SPECIAL MACHINE ROOM, DESIGN AND CONSTRUCTION 6. Special machinery rooms for refrigerants of the L2 group. 6.1. Emergency exits. At least one emergency exit must connect directly with the outside or otherwise lead to an emergency exit aisle. Doors leading to this emergency corridor will be capable of being opened manually from inside the machinery room (panic system). 7. Special machinery rooms for flammable refrigerants. 7.1. Engine rooms for refrigerants of safety classes A2L, A2, A3, B2L, B2 and B3. Special machinery rooms for refrigeration systems using Group L2 and L3 refrigerants will meet, at the least,	Proposal: deletion of point 7.1 in Royal Decree 552/2019 Explanation: The requirement for a direct exit to the outside or to an emergency exit has disappeared in the update of standard UNE-EN:378-3:2017+A1, for the engine rooms of the refrigerant groups A2L, A2, A3, B2L, B2 and B3 and remains only for the R-717	R. The proposal has been rejected, as it was not foreseen in the initial draft and could mean a reduction in safety conditions.

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		the requirements of paragraph 6.1. Text in UNE-EN 378-3:2016 5 Engine rooms 5.14 Engine rooms for refrigerant groups A2L, A2, A3, B2L, B2 and B3 5.14.5 Doors and openings In special machinery rooms where the refrigerant load is above the practical limit for the volume of the enclosure and the coolant is A2L, A2, A3, B2L, B2 or B3 it must have a door that gives access either directly to the outside or to a particular lobby, equipped with airtight doors and with automatic closure. Text in UNE-EN 378-3:2017+A1 5.14 Engine rooms for refrigerant safety classes A2L, A2, A3, B2L, B2 and B3 5.14.3 Additional requirements for the R-717 5.14.3.4 Doors and openings Machinery rooms, where the load of refrigerant is above the practical limit for the volume of the room must have a door that either opens directly to the outside, or with an antechamber equipped with watertight doors of automatic closing that gives to an exit corridor. 5.14.5 point removed		
752	AFEC (Association of Air Conditioning Equipment Manufacturers)	1. General requirements. 1.1. Fire protection. In addition to the requirements laid down in this Regulation, the specific national or local fire prevention, pro-	Drafting proposal: incorporate the text of the latest version of standard UNE-EN:378-3:2017+A1 1. General requirements. 1.1. Fire protection. In addition to the requirements laid down in this Regulation,	PA. Reference is made to the RIPCI. Moreover, since these systems must comply with the RIPCI, there is no need to copy here the requirements already mentioned in the implementing rules of

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		tection and control provisions applicable to them will be complied with in the design and implementation of refrigeration facilities. The extinguishing agents used must not freeze at the temperatures the facilities operate at. They must be compatible with the refrigerants used in the facilities and suitable for extinguishing fires derived from electrical and oil components whenever the installation uses oil-immersed switches. Fire extinguishing systems must be periodically serviced and maintained in proper working order at all times. In R-717 refrigerant system engine rooms, sprinkler devices (water) are not allowed for fire prevention unless the following conditions are met: – The sprinklers are individually operated at a temperature above 141 °C. – There is no manual override system. – The installation complies with the requirements of standard UNE-EN 12845.	the specific national or local fire prevention, protection and control provisions applicable to them will be complied with in the design and implementation of refrigeration facilities. The extinguishing agents used must not freeze at the temperatures the facilities operate at. They must be compatible with the refrigerants used in the facilities and suitable for extinguishing fires derived from electrical and oil components whenever the installation uses oil-immersed switches. Fire extinguishing systems must be periodically serviced and maintained in proper working order at all times. In R-717 refrigerant system engine rooms, sprinkler devices (water) are not allowed for fire prevention unless the following conditions are met: – the spray heads are activated individually at a temperature of 141 °C or higher (high temperature according to Standard EN 12845); – There is no manual priority control for manual activation of the sprinkler system. – The installation must comply with the requirements set out in the Regulation on fire protection facilities approved by Royal Decree 513/2017, of May 22.	that regulation.
753	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	MAIN 1. TIMELINESS OF THE PROPOSAL b) Objectives pursued In the summary: (...) is to achieve a sufficient degree of safety in the event of fire in establishments and facilities for industrial use... In the text: This proposal for a Royal Decree aims	*'to achieve a sufficient degree of security'* is named generically in the summary And the text mentions first 'prevent the appearance' and then 'limit its spread and enable its extinction, minimising the damage that the fire can cause to people, goods and the environment'. Of the proposed order, an order of priorities could be established and then not transferred to the articles. Thus in *Article 6. Basic safety requirements in the event of fire* , it is proposed: ... (see Article 6) Without setting priorities and without mentioning the 'environment'.	C. The submission is a comment that does not include specific proposals. In any event, Article 1, Object, of the regulation establishes a general objective, which is then reflected in its articles (and within it, in Article 6, which in turn is then developed in the annexes). The object does not mention priorities or set any order of preferences, but lists a series of generic objectives that then materialise specific requirements in the rest of the text. For its part, the MAIN is

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		to update the aforementioned technical regulations that better are adapted to the needs, possibilities and technical solutions currently available for industrial establishments. The new Regulation on fire safety in industrial establishments maintains the same approach as the previous one, seeking to prevent the occurrence of fires in industrial establishments, or if this is not possible, limit their spread and enable their extinction, minimising the damage that the fire can cause to people, goods and the environment. The ultimate objective is to achieve an adequate level of fire safety in industrial establishments.		a document that explains in a general way the purpose and content of the regulation, without going into detail, and the text that has been added to it is similar to that of Article 1 of the Regulation, as well as the text that appears in the recitals of the Royal Decree.
754	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	MAIN 1. TIMELINESS OF THE PROPOSAL c) Analysis of alternatives	APPUNLE in its 2020 submission advocated alternative b), and in view of the text delivered, despite the fact that "Of the alternatives studied, the option is chosen. a) *Development of a new regulation that repeals and replaces the previous one'* We consider that the text presented is very similar to the previous text, but with the differences in structure sufficient to 'discover' after more than 20 years of working with the structure of the previous Regulation (2004), without bringing anything more than concrete changes that could be made to the structure of the previous Regulation. On the changes, the relevant claims are made, but with regard to the alternative chosen, it is also considered that it would be better to maintain alternative (b), maintaining the previous structure and making any changes deemed appropriate following the submissions presented.	C. It has been decided to issue a new regulation rather than partially amend the previous one in 2004 because, given the changes that were intended to be made, they affected almost all of the regulations in force. The new text did not intend to make radical changes to the way the 2004 regulation works, as is normal, but only to complete and update it. However, there has been a complete reorganisation of the text and an almost complete rewrite of the text, updating the requirements and references that have become obsolete. The reordering of the sections of Annexes II and III was almost mandatory given the existence of other regulations (CTE DS-SI and RIPCI) with which the RSCIEI is intended to align. These changes would

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				not have been feasible if only a partial revision of the text had been chosen.
755	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	MAIN 1. TIMELINESS OF THE PROPOSAL d) Adaptation the principles of good regulation	We understand that this principle is not maintained when, in several points, it refers to the criterion of the industry department of the relevant Autonomous Community On the other hand, it establishes the very important role of bodies pending to set up, also referring to the criterion of the industry department of the relevant Autonomous Community until such bodies are established.	C. As is the case in all industrial and other safety regulations, the administration implementing the regulations has the final word for the interpretation of the regulation and its criteria. In addition, in the field of industrial safety, the Autonomous Communities have competence to develop the requirements laid down in state regulations. This is explained in the MAIN, detailing that 'The current Regulation on fire safety in industrial establishments, approved by Royal Decree 2267/2004, of 3 December, as well as the present Royal Decree that will replace it (...), all have their legal coverage in Law 21/1992, of July 16, whose Article 12.5 determines that the regulations on industrial safety, at state level, will be approved by the Government of the Nation, without prejudice to the fact that the Autonomous Communities, with legislative competence over industry, can introduce additional requirements, in the case of facilities located in their territory. "
756	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	MAIN 6. IMPACT ANALYSIS 6.1 Overall economic impact.	From the reading of the articles and its annexes, high cost impacts are detected for the logistics warehouse sector and negative impacts on both competition, on the market and budgetary unit. The fact of passing all the industrial units, practically, to High Risk 8 derives many and high increases of the new industrial units and even higher in the customer changes of the old industrial units. Concrete measures such as: The need to change pumping groups and deposits resulting from increased risk	C. It should be noted that the interested party has mentioned in an earlier submission that *"(...) We consider that the text presented is very similar to the previous one (...), without providing anything more than concrete changes that could be made to the structure of the previous Regulation'*. We understand that this is actually the case, and that the new text proposed does not make any radical changes to the 2004 text as

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			The need to increase outlets for the same reason. The need to maintain SCTEHs that harm ESFR sprinklers, and which should be increased by the increase in intrinsic risk. How to raise voice warnings. And all those raised in the submissions to the Regulation, imply cost increases of hundreds of thousands of euros in each logistics warehouse that is built or reformed, without having a positive impact on the increase of security and in some case negative impact in addition to implying the extra cost.	regards its requirements. Regarding the classification of establishments (Annex I), both in the 2004 text and in the current text, there are several ways to calculate the level of risk of an establishment, with the project executor being able to choose which one to use. It was not intended to change the functioning of this methodology, but to detail it better to avoid ambiguities or miscalculations. Of the other annexes, the requirements that have been changed have been minor and thoroughly studied. In addition, the provisions of the Regulation provide for measures to ensure that there is no need to adapt existing establishments that are currently operating to the new regulation. In any event, the specific claims on specific sections have been assessed in their respective locations and the appropriate changes have been made, so that the things mentioned here have already been specifically assessed and, where appropriate, modified.
757	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	MAIN 6.2 Impact on competition	If the new industrial units must have the extra costs mentioned in the previous point, they will not be able to compete with the old industrial units so that the possible movements of users due to the need for extension or updating of procedures will be stopped artificially. Allowing the competent body of the Autonomous Communities and the Autonomous Cities to require justifications additional to those of the regulation, without the regional rules establishing the requirements, will create legal uncertainty and a breakdown in the general principle of legitimate	C. The levels of requirements for new establishments are similar to those established in 2004, so the above situation should not be given. With regard to old industrial units that are already in operation, they are not asked to adapt to the new regulation as a general rule, establishing the different possible cases in the articles of the regulation. In any event, the specific comments that can be made to specific paragraphs have been as-

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			expectations about the result expected by those administered in each file. The regulation of the draft regulation will generate greater economic costs and increase the deadlines for the same project in some Communities compared to others. This will affect competition and, in many cases, the choice of the destination of economic investment to those Communities where there is a clear legal regime pre-established by the rules, and not by personal criteria or administrative bodies. Thus in Articles 4 and 5 of the draft regulation alleged.	sessed in their respective submissions and appropriate changes have been made. On the action of the competent bodies of the Autonomous Communities, this will be within the scope of the regulation, as it has been so far. In any event, it is recalled that the Autonomous Communities are competent to develop the requirements laid down. This is explained in the MAIN, detailing that 'The current Regulation on fire safety in industrial establishments, approved by Royal Decree 2267/2004, of 3 December, as well as the present Royal Decree that will replace it (...), all have their legal coverage in Law 21/1992, of July 16, whose Article 12.5 determines that the regulations on industrial safety, at state level, will be approved by the Government of the Nation, without prejudice to the fact that the Autonomous Communities, with legislative competence over industry, can introduce additional requirements, in the case of facilities located in their territory. "
758	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	MAIN 6.3 Impact on Market Unit Page 23 of 32.	By maintaining interpretative criteria on the part of the Regional Administrations, often divided into provincial units, it is not avoided the problem that the current Regulation has had that each province had a different form of application of the regulation, a problem increased by the profusion of performance studies that went off the prescriptive path. This problem has not been eliminated with the current draft. The impact is greatest when the interpretative criterion is attributed to administrative bodies of the Autonomous	C. The Autonomous Communities have competence to develop the established requirements. This has been explained in the MAIN, as indicated above.

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			Communities based on motivations such as 'if deemed appropriate'. A forecast that will generate discretion in the actions of the Administration and a fragmentation in the Spanish market, both because of the different rules between Communities in the requirements required for the same project and, consequently, their cost.	
759	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	MAIN 6.4 Impact on SMEs	There are SMEs, both among the developers and the users of logistic warehouses, that will be affected by all the economic impacts, on the competition and the market unit described.	C. It should be noted that the levels of requirements for new establishments are similar to those established in 2004. In addition, the regulation introduces certain considerations in favour of SMEs by, for example, derogating from small establishments (similar to what the 2004 Regulation did in Article 2.3) and in general, limiting the requirements according to the area of the establishment and its level of risk, so that the stricter requirements apply to places of greater size and greater risk.
760	ASSOCIATION OF DEVELOPERS, OWNERS AND USERS OF LOGISTIC WAREHOUSES OF SPAIN (APPUNLE)	MAIN 6.6. Budgetary impact due to increased administrative burdens.	The impact on administrative burdens will be increased due to the lack of a unified legal framework. The Regulation does not offer objective criteria to be used by the administrators and the acting Administration, to which it is assigned the responsibility of verifying in each file the adequacy of the project even if it meets the regulatory requirements.	C. The course of action is equivalent to that of 2004. No significant changes have been made to the way in which the establishments are commissioned. The principal change that has been made in relation to the documentation to be presented has been in the case of exceptions (particular cases), which is an optional route that is left open for those who want to carry out a tailor-made project without complying with the prescriptive technical solutions offered by the annexes of the regulation, and which should be a very little used route. In this case, prior explicit authorisation from the Autonomous Communities was previously required, and a post-clearance check has now been carried out, following verification of the require-

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				ments by an independent entity to replace the lack of prior review. This change, contrary to what the submission suggests, is made with the main objective of making it easier for planners and owners who want to use that route, to do so more quickly and flexibly, without the need for express authorisation from the administration. However, it should be recalled that the administration can always act if it detects hazardous establishments, as is the case both in the previous regulation of 2004 and in the other existing industrial safety regulations. Lastly, on the lack of a unified legal framework, it is recalled that the Autonomous Communities have competence to develop the requirements set, as is the case with other regulations.