

AmCham EU position on tourism accommodation safety in the EU

Calling for the adoption of EU regulation to set minimum requirements for tourism accommodation safety

Executive summary

The tourism sector represents 4% of the EU's gross domestic product (GDP) and directly employs around 20 million people. Every year, approximately 480 million tourists, of which half are non-EU residents, visit Europe. The EU counts some 200,000 hotels and tourist accommodations.

AmCham EU believes that the economically crucial EU tourism sector requires high-level safety regulation to ensure adequate protection for all travellers, tourists and workers. Tourists and visitors have the right to expect the same minimum standard of safety across the EU, regardless of the number of rooms, size or type of accommodation.

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Introduction

The current non-binding Council Recommendation 86/666/EC, on fire safety in existing hotels, and self-regulatory measures have proven insufficient in guaranteeing an adequate and consistent level of safety across the EU. Moreover, enforcement varies considerably across countries.

Tourism accommodation safety can cover many different areas from building safety, to safety rules for swimming pools. Due to its members involved in the fire safety and security sector, the American Chamber of Commerce to the European Union (AmCham EU) will focus specifically on fire safety aspects for buildings.

A harmonised EU-level regulation with regard to fire safety and security would ensure product requirement stability and standardisation, creating a better environment for product development and innovation.

Background – the situation today

National fire safety measures are inconsistent across the EU and lack harmonisation. The definitions for tourism accommodation are also inconsistent across the EU and the thresholds in terms of number of rooms, size and height of rooms, are different. These thresholds generally determine the level of fire protection required. For example, some countries require the installation of fire detectors inside bedrooms whereas others only require them in hotel corridors. The frequency of fire inspections also varies from country to country, and even city to city, even in the same region. Carbon monoxide-related risks in tourism accommodation are not covered in many EU countries.

What minimum safety requirements should include:

1. Common definitions to ensure minimum requirements for safety

AmCham EU believes that the definitions of accommodation type and room height and size, among others, should be harmonised across the EU for safety regulation purposes.

Hotel (new and old): The definition in the 86/666 Recommendation, ‘commercially operated establishments which occupy all or part of a building and which, under the name of hotel, boarding house, inn, tavern, motel or other equivalent designation, can offer accommodation to at least 20 temporary paying guests’, is appropriate.

Height of hotel: At a certain height, fire brigade ladders cannot reach the windows to rescue guests; at higher levels, firefighters must enter a building to establish a bridgehead. This takes time and additional fire safety measures, such as fire sprinklers, need to be present to reduce this risk. The definition should explain this and indicate what a high-rise hotel means. We suggest 20 to 22 meters, which is the maximum reach of most fire brigade ladders and is applied in several Member States.

2. Minimum levels of fire detection and suppression

AmCham EU believes that the EU tourism sector requires high-level safety regulation to ensure adequate protection for all. Visitors and tourism employees have the right to expect the same minimum standard of safety across the EU, regardless of the number of rooms, size or type of accommodation.

Uniform enforcement is vital. AmCham EU believes that any minimum requirements should be written into an EU Directive. A Directive would then allow the European Commission to mandate standards that can ensure a harmonised enforcement at the local and national levels, with oversight by the Commission. This would guarantee a consistent level of protection for tourists and employees across the EU.

AmCham EU does not support self-regulation when it comes to tourism accommodation safety but rather, calls for an EU Directive in order to ensure adequate level of safety in all tourism accommodations across the EU.

In 2004 the Commission published a Directive on tunnel fire safety. The proposal had been preceded by a number of tunnel fires with casualties. We believe we should not wait any further before adopting a Directive on tourism accommodation safety.

Additional considerations

Minimum EU rules for tourism accommodation safety should also consider specific provisions for the safety of persons with limited mobility and the elderly.

Specifically, the signalling of evacuation routes, multi-lingual voice and alarm messages and visual alarm devices for the hearing-impaired should be considered along with sound and intelligible-voice alarm devices. Fire sprinklers should be required for hotels of certain heights to help contain fires so that the elderly and those with mobility issues can safely evacuate the building.

In the US, all hotels higher than three floors are required to install fire sprinkler systems. Also in Europe, many countries have regulated high-rise hotels to fit additional fire safety measures. For example, fire sprinkler threshold requirements vary, with 9 meters being the threshold in Portugal and 200 meters in France. We believe this should be regulated across the EU.

3. Regular maintenance and inspections of fire safety equipment

In addition to minimum fire safety measures, AmCham EU believes that pertinent EU standards for installation and maintenance services are necessary.

AmCham EU also believes that a more consistent approach to the inspections of fire safety systems is needed. There should be regular third-party inspections by qualified persons of fire and other safety systems on site, checking the presence, correct installation and maintenance of equipment.

The number of fires in tourism accommodation, due to breaches in fire protection regulation, shows that market surveillance of fire safety systems is insufficient.

For example, in 2011, the fire protection authorities in the UK reported that 51% of inspected hotels offered a poor level of fire safety. Only 5 to 8% of hotels in the UK are inspected annually.

4. Carbon monoxide detection in key areas

AmCham EU believes that a harmonised EU Directive on tourism accommodation safety should include requirements for carbon monoxide (CO) detection. There have been many tragic incidents of CO leakage that could have been avoided with a minimum level detection.

We strongly support the adoption of European standards and a technical guidance document developed by experts guided by the European Committee for Standardization (CEN). CEN currently has work groups that can provide input, although we believe it would be best to create a new CEN committee focused on the creation of the technical guidance document. This would allow for experts that understand fire risk and the tourism accommodation industry to create standards for fire safety to ensure level equipment functioning in all European tourism accommodations. We recommend that strict timetables be established for CEN and the technical expert working group.

5. Centralised collection of statistics of fire incidents

AmCham EU supports the establishment of a European centralised collection of fire incident statistics. Accurate fire data and reporting by national authorities are very useful in developing the best prevention, detection and suppression systems, as well as responses. It is essential to understand the current level of fire risk in hotels and the degree of compliance with local, national and European regulations and guidelines.

National governments should collect and report fire incidents to a central administrator. The National Fire Protection Association in the US and the UK scheme are good sources of information and can provide a good example for collecting fire data. We would recommend a closer review of both systems.

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AmCham EU speaks for American companies committed to Europe on trade, investment and competitiveness issues. It aims to ensure a growth-orientated business and investment climate in Europe. AmCham EU facilitates the resolution of transatlantic issues that impact business and plays a role in creating better understanding of EU and US positions on business matters. Aggregate US investment in Europe totalled €2 trillion in 2014 and directly supports more than 4.3 million jobs in Europe.

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