



TECHNICAL AND INDUSTRY POSITION PAPER

Life safety and fire protection inspection is not a mere formality

It is a risk control for people's lives

ANRACI's observations on **Draft Agreement 874 of 2025** of the Bogotá City Council, *"Establishing guidelines to guide and strengthen the minimum conditions for the review of structural fire protection systems in Bogotá D.C. and issuing other provisions"* (text approved in first debate by the First Standing Committee on the Development Plan and Land-Use Planning, session of November 12, 2025).

Bogotá D.C., October 2026

LIFE SAFETY AND FIRE PROTECTION INSPECTION IS NOT A MERE FORMALITY

ANRACI's technical and industry position paper on Draft Agreement 874 of 2025 of the Bogotá City Council.

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Executive summary

Draft Agreement 874 of 2025 proposes that the Bogotá Official Fire Department (UAECOB) issue the life safety and fire protection technical certificate (concepto técnico) to buildings and establishments of **low and moderate risk** that complete a virtual **self-management** process, and leaves a subsequent random visit as optional —"may"— with no minimum percentage [1]. At the same time, the community is increasingly identifying the Fire Department's certificate as a "red-tape procedure" that should be streamlined or eliminated.

ANRACI shares the goal of expanding coverage, making use of technology and reducing unnecessary burdens on citizens. It does not agree, however, that the technical verification of the conditions on which people's lives depend should be left in the hands of those who have an interest in the outcome. This document supports that position with nine ideas:

1. **In substance, it is not a mere formality.** It may take the form of a procedure before a public entity, but its purpose is to verify physical conditions —exits, detection, suppression, installations— whose failure costs lives. What must be simplified is the procedure, not the verification.
2. **By analogy, vehicle roadworthiness inspection has already been upheld by the Constitutional Court.** In Ruling C-131 of 2004, the Court concluded that requiring roadworthiness inspection for private vehicles does not violate the principle of good faith, because it protects the general interest and reduces accidents [6]. The same reasoning applies to a building.
3. **Bogotá faces a real and measurable risk.** In 2025, 899 structural fires were recorded (11.19 per 100,000 inhabitants); 70.5% of structural fires in the 2014–2021 series occurred in residential buildings and 81.7% had accidental causes, meaning that most were preventable [2].
4. **The interested party is not a good inspector.** In general, they lack the technical competence to evaluate an engineered system and have an obvious conflict of interest: they want to open, operate and avoid costs. The tragedies of Grenfell (London, 72 deaths), the Kiss nightclub (Brazil, 242 deaths) and Wang Fuk Court (Hong Kong, 168 deaths) show the price of weak verification.
5. **The International Code Council (ICC) has already answered these questions.** Its family of codes —the International Fire Code (IFC), the International Existing Building Code (IEBC) and the International Property Maintenance Code (IPMC)— regulates safety throughout the entire life of a building: the owner maintains and keeps records, the authority inspects and only accepts reports from approved agencies, special risks require operational permits and inspectors have certified competencies. They are also the codes toward which Colombia is already moving.
6. **International good practices do not eliminate inspection: they prioritize it by risk and entrust it to competent, independent people.** This is what the OECD principles recommend and how the United States (NFPA 1730), Singapore, Hong Kong, Peru and Mexico City operate. Colombia already does this in cases such as residential gas and vehicle roadworthiness inspection.

7. **There is a better alternative than self-inspection:** a model based on risk levels, with third parties accredited by ONAC (the National Accreditation Body of Colombia), specialized teams that inspect the highest-risk sectors throughout the city, periodic inspection of electrical installations, specific attention to condominium buildings, and technical verification for all risk levels, without self-review: for low risk, through real-time remote verification conducted by a competent inspector and/or supported by properly validated and tested artificial intelligence tools. Chapter 10 analyzes the applicable legal framework and proposes a **short amendment to the articles**, within the Council's powers, together with an administrative and national roadmap in which ICC codes are the technical basis.
8. **The project focuses on paper, not on safety.** Its operational core is how to issue the "Fire Department Certificate" faster. When the goal is a document, the activity is managed as an administrative procedure and perceived as such. What matters is people's safety, the protection of property and businesses, and the continuity of operations.
9. **Mass coverage, yes, but with competence, and there are funds to pay for it.** Universal coverage is achieved with accredited third parties (as with gas) and with high-level remote inspection technology conducted by competent inspectors, supported by technological tools, not by transferring inspection to the interested party. Bogotá already has a fire surcharge (Agreement 927 of 2024) and the certificate is free of charge for users: those resources should fund the solution.

The right question

The question is not whether the Fire Department certificate is an annoying procedure. The question is: **who verifies, with what knowledge and with what independence, that a building occupied by people can protect them in the event of a fire?** If the answer is "the interested party, by filling out a form", the State will have transferred to citizens a risk they are not equipped to assess.

1. The draft agreement and what is at stake

1.1 What the text approved in first debate provides

The text approved on November 12, 2025 has five articles [1]:

Article	Content
Art. 1. Purpose	To establish guidelines to guide and strengthen the minimum conditions for the review of fire protection systems and to improve life safety against structural fires and hazardous materials in buildings and commercial establishments, within the framework of Law 1575 of 2012.
Art. 2. Responsible entity	UAECOB "may define" the review procedures.
Art. 3. Guidelines	Mass coverage, self-management (by owners and managers, as "shared responsibility for risk management"), virtualization and training.
Art. 4. Fire Department Certificate	UAECOB shall issue a technical certificate to low- and moderate-risk buildings and establishments that carry out their self-management "virtually and/or visually", provided they meet the minimum measures.
Art. 4, paragraph	UAECOB "may" randomly carry out a verification visit to those who received a favorable certificate virtually. No minimum percentage or frequency is set.
Art. 5. Entry into force	Upon publication.

Source: Bogotá City Council, text approved in first debate, DA 874 of 2025 [1].

1.2 What changed from previous versions

The initiative is not new. Under the same title, it was filed as Draft Agreements 156, 522 and 650 of 2023 and 028, 256 and 545 of 2024 [27]. Previous versions provided that UAECOB would **annually** carry out random visits to "at least 10%" of the establishments that had obtained a favorable certificate virtually [27]. The text approved in 2025 removes that minimum and turns verification into a discretionary power. As a result, the only safeguard of the self-management model is left without an enforceable floor.

ANRACI's observation

A self-declaration scheme without a mandatory minimum of verification ceases to be "self-management with subsequent control" and becomes, in practice, **self-certification**. The international experience summarized in chapters 6 and 7 shows that no benchmark system entrusts the life safety of moderate-risk buildings to the interested party's declaration alone.

1.3 The context: the "anti-red-tape" pressure

Law 2052 of 2020 requires public entities to streamline, automate and digitize their procedures, and requires new ones to be carried out entirely online [8]. That policy is necessary. In this context, several cities have simplified the Fire Department certificate: Medellín, for example, has enabled online self-management since May 2026 —with photographic records and no on-site inspection— for

establishments of up to 100 m² with low-risk activity [25]. In Bogotá, low-risk establishments already obtain the certificate through a virtual training course and a self-review form [24].

The risk of this trend is that the discussion shifts from **how to make verification more efficient** to **how to eliminate it**, and that a documentary record and an inspection on which the evacuation of hundreds of people depends are treated with the same logic.

1.4 ANRACI's concerns

- **Nature:** describing inspection as a mere administrative procedure ignores its function as a preventive control of a risk to life (chapter 2).
- **Technical competence:** fire protection is engineering; a form completed by a non-specialist cannot replace a technical assessment (chapter 4).
- **Conflict of interest:** someone who wants to open and operate their business is not an impartial evaluator of their own conditions (chapters 4 and 5).
- **Scope:** extending self-management to moderate risk and making verification optional runs contrary to international good practices (chapters 6 and 7).

1.5 The underlying problem: a certificate-centered project

Reading the project as a whole, it becomes clear that its central concern is the **certificate**. Article 4, its operational core, is titled "Fire Department Certificate", and the guidelines in Article 3 —mass coverage, self-management, virtualization and training— are in practice aimed at issuing more certificates, faster and with fewer visits.

That approach is the source of the problem. **When the goal is to obtain a piece of paper, the activity is managed as an administrative procedure; and when it is managed as an administrative procedure, it is perceived as such and ends up being attacked as such.** The perception that inspection is a bureaucratic burden does not arise from its nature, but from the way it has been administered.

The purpose of life safety and fire protection inspection is not to produce a document. It is to achieve four concrete results:

- **The safety of the people** who live, work, study in or visit the building, and of the firefighters who respond to the emergency.
- **The protection of the assets** of families and businesses.
- **The protection of businesses**, especially small ones, which often do not survive a fire.
- **The continuity of operations:** of employment, essential services and production chains.

If those are the goals, the policy's success indicators cannot be the number of certificates issued or the response time, but rather verification coverage by risk level, unsafe conditions detected and corrected, systems that work and, above all, the trend in fires, victims and losses.

Certificate-centered approach



Safety-centered approach

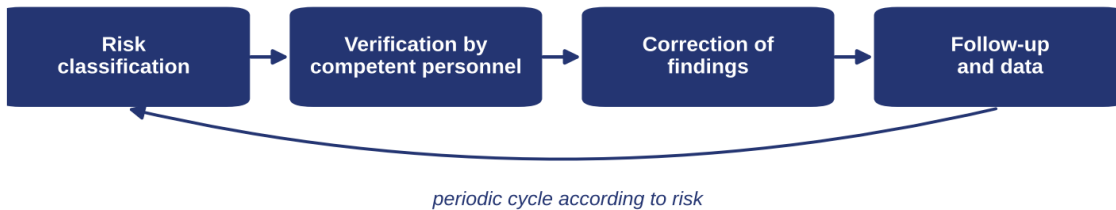


Figure 1. From the certificate to safety: two ways of understanding inspection. Prepared by ANRACI.

Paper does not put out fires

A certificate does not detect smoke, does not open a blocked exit and does not pressurize a fire protection network.

The technical certificate is the evidence of a verification, not its purpose. A model that optimizes the issuance of paper and weakens verification produces exactly the opposite of what the Agreement says it seeks in its Article 1: strengthening life safety conditions.

2. Why inspection is not a mere formality

2.1 What an administrative procedure (trámite) is

Colombia's Administrative Department of Public Service (Función Pública) defines an administrative procedure as the "set of requirements, steps or actions regulated by the State, within a mission process, that citizens must carry out [...] before an entity [...] to access a right, carry out an activity or fulfill an obligation, provided for or authorized by law" [7].

ANRACI recognizes that, in its **form**, the request for the Fire Department certificate fits that definition: it is a step that citizens take before an entity in order to carry out an activity. But that is a description of the procedure, not of its purpose. The policy of streamlining procedures seeks to eliminate requirements that add no value, duplications, documents the State already holds and unnecessary trips. It does not seek —and could not seek— for the State to stop verifying conditions on which people's physical integrity depends.

2.2 The fundamental difference

Aspect	Documentary procedure (e.g., a registration)	Life safety and fire protection inspection
Purpose	To verify or record information.	To verify the actual physical conditions of an occupied building.
What is reviewed	Documents, data, payments.	Exits and means of egress, occupant load, detection and alarm, suppression, electrical and gas installations, storage of hazardous materials, system maintenance.
Knowledge required	Administrative.	Engineering and certified competencies in fire protection and life safety.
Consequence of eliminating it	Lower administrative burden; low or no risk.	Undetected unsafe conditions; risk of injury and death to third parties who did not choose to assume it.
Who bears the risk	Mainly the applicant.	Workers, customers, residents, neighbors and firefighters responding to the emergency.
Analogy	Registration in a database.	Vehicle roadworthiness inspection; periodic inspection of the gas installation.

The last row of the table is the key. What makes a control indispensable is not its form, but that its failure exposes **third parties** to serious and irreversible harm. A vehicle with defective brakes does not only endanger its driver; a shop with a blocked exit or a fire protection network without pressure does not only endanger its owner.

2.3 Legal basis: a risk control, not a formal requirement

- **Political Constitution:** the authorities are established to protect the lives of all persons (art. 2); the right to life is inviolable (art. 11); economic freedom is exercised "within the limits of the common good" (art. 333).
- **Law 1575 of 2012 (General Firefighters Law):** recognizes comprehensive fire risk management as an essential public service under the responsibility of the State and, in its Article 42 (amended by Law 1796 of 2016), designates fire departments as the competent bodies for fire prevention and life safety inspections in public and private buildings and, in particular, in commercial and industrial establishments [2][4].
- **Law 1801 of 2016 (National Code of Security and Coexistence):** Article 87 requires that, while the economic activity is being carried out, "the safety, health and environmental conditions determined in the Police regime" be met [5]. This is a permanent operating condition, not a one-time opening step.
- **Law 1523 of 2012:** disaster risk management is a social process aimed at protecting the population; risk reduction —of which preventive inspection is a tool— is one of its processes.

From this perspective, inspection is an expression of the State's preventive function in the face of a risk to life, of the same nature as health control of food or road safety enforcement.

2.4 The analogy with vehicle roadworthiness inspection and gas inspection

The comparison proposed by ANRACI is not rhetorical: it has constitutional and regulatory support in Colombia.

Vehicle roadworthiness inspection

Law 769 of 2002 made vehicle roadworthiness inspection (revisión técnico-mecánica) mandatory. It is carried out at authorized and certified Automotive Diagnostic Centers, with the stated purpose of "guaranteeing road safety and environmental protection" [11]. When the law was challenged for disregarding good faith, the Constitutional Court (Ruling C-131 of 2004) concluded that **the principle of good faith is not absolute**, that it must be weighed against the general interest, and that the periodic inspection of private vehicles is a reasonable measure because **it is based on the need to reduce accident rates** [6].

The parallel with buildings is direct: if it is reasonable to verify periodically, through an authorized third party, that a vehicle can brake, it is also reasonable to verify that an establishment can be evacuated and that its fire protection systems work.

Periodic inspection of gas installations

CREG Resolution 059 of 2012 provides that internal gas installations must be inspected at least **every five years**, by the distribution company or by an **inspection body accredited by ONAC**, at the user's choice; if the inspection is not carried out on time, service is suspended **for safety reasons** [10]. No one argues that this inspection should be replaced by a self-declaration by the user, and its existence is not debated as an obstacle to freedom of enterprise.

A question of consistency

Colombia requires a competent third party to certify the brakes of a car and the gas installation of an apartment.

It would be inconsistent if, for a restaurant, a warehouse or a residential building where dozens or hundreds of people gather, it were enough for the owner to declare that everything is in order.

2.5 Streamlining does not mean leaving people unprotected

ANRACI supports streamlining the procedure: online application, payment and scheduling; interoperability with the Chamber of Commerce and the Finance Department; automatic risk classification; digital delivery of the certificate with a verification code; validity periods differentiated by risk; and the use of data to prioritize visits. All of this reduces time and cost without reducing protection.

What must not be streamlined is **independent technical verification** in buildings where the risk to people justifies it. The OECD is explicit that the risk-based approach makes it possible to "inspect less in quantity, but not necessarily in quality" [12].

3. Examples: what happens when verification fails

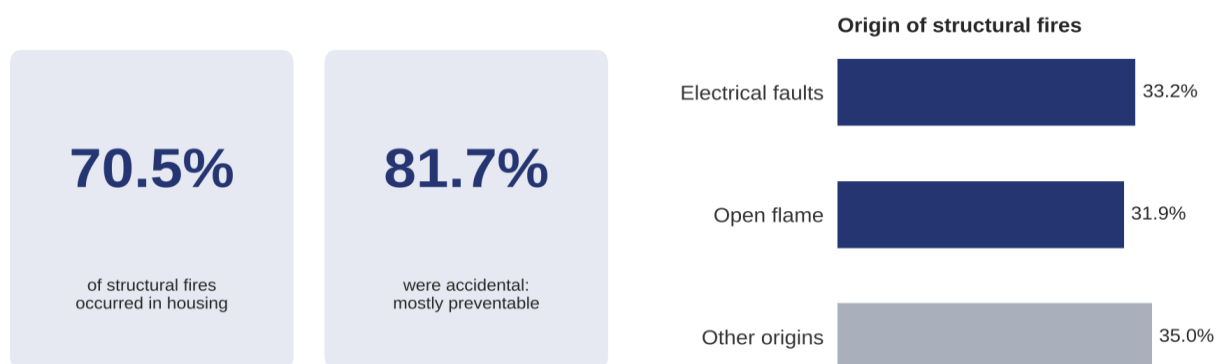
3.1 Bogotá in figures

Bogotá has one of the most robust records in the country. ANRACI's White Paper on Fire Protection, built with primary operational data from fire departments, summarizes the situation as follows [2]:

Indicator	Value
Structural fires in Bogotá, 2025	899
Fires of all types attended by UAECOB, 2025	1,367
Structural fire rate, 2025	11.19 per 100,000 inhabitants
Structural fires in residential buildings (2014–2021 series)	70.5%
Structural fires with accidental causes (2014–2021 series)	81.7%
Origin: electrical faults / open flame (2014–2021 series)	33.16% / 31.86%
Electrical origin (electrical fault, appliances, sparks), 2025	≈ 25% of those with a determined cause
Most affected localities	Kennedy, Suba, Ciudad Bolívar, Engativá and Bosa
Total UAECOB responses, 2025	41,286 [26]

Source: ANRACI, White Paper on Fire Protection (2026), based on data from the Bogotá Official Fire Department [2]; Bogotá Fire Department cited by Pulzo (2026) [26].

Bogotá, 2014–2021 series



Source: ANRACI, White Paper on Fire Protection (2026), with data from the Bogotá Fire Department.

Figure 2. Structural fires in Bogotá: housing, accidental causes and origin. Prepared by ANRACI.

Nationwide, ANRACI estimates about **6,440 structural fires per year** in urban areas —some 17.6 per day and 12 per 100,000 inhabitants—, more than double the latest official figure available from the National Fire Department Directorate (5 per 100,000, year 2020) [2]. These figures have two readings that matter for the draft agreement:

- **Risk is where people live and work.** The concentration in housing and in dense localities, with mixed uses and aging buildings, indicates that controls must reach condominium buildings and neighborhood shops, not only large establishments.
- **Most fires are preventable.** The fact that 81.7% are accidental is not a mitigating factor: it is proof that low-cost measures —electrical maintenance, control of ignition sources, early detection, clear exits— prevent most events. Those measures are precisely what a competent inspection detects and requires [2].

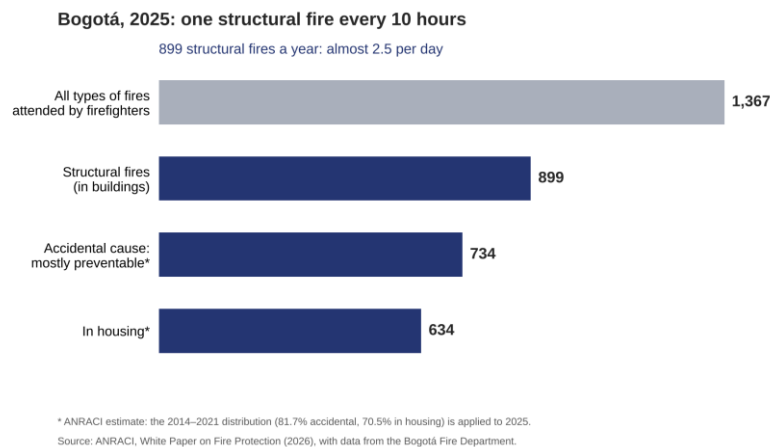


Figure 3. In 2025, Bogotá recorded one structural fire every 10 hours, and most could have been prevented. Prepared by ANRACI.

3.2 The capacity gap

In 2020, UAECOB reported that the city has **approximately 1.5 million buildings and commercial establishments** that require the technical certificate, and that **44,000 inspection visits** were carried out in 2019 [24]. At that rate, annual coverage would be close to **3%** and it would take more than **30 years** to visit each building once ($1,500,000 \div 44,000 \approx 34$). ANRACI's own White Paper warns that inspection of existing buildings "does not cover all commercial establishments and buildings in the country, but only a small fraction" [2].



Figure 4. The inspection capacity gap in Bogotá. Prepared by ANRACI.

The capacity problem is real and ANRACI does not ignore it. But the answer to the shortage of inspectors cannot be for each interested party to inspect itself. The answer, as developed in chapters 8 and 9, is to **expand competent inspection capacity** through accredited third parties and to **focus UAECOB** on high risk and on supervising the system.

Note: the figures of 1.5 million buildings and 44,000 visits come from UAECOB's public information for 2020; it is recommended to request from the entity updated figures on certificates issued through self-review and through visits, and on subsequent verification visits carried out.

3.3 International cases

Kiss Nightclub — Santa Maria, Brazil (January 27, 2013)



Façade of the Kiss nightclub days after the fire. Photo: Leandro LV, CC BY-SA 3.0, via Wikimedia Commons.

A fire started by a pyrotechnic device on stage caused **242 deaths** and more than 600 injuries, mostly young university students. About 1,110 people were attending a venue with a capacity of 769; the nightclub had operated for periods without a fire department permit and, at the time of the fire, **the permit had expired five months earlier** [22]. Most victims died from inhaling toxic smoke generated by the acoustic foam on the ceiling. The tragedy gave rise to the so-called "Kiss Law" (Law 13,425 of 2017), which tightened prevention and enforcement requirements in Brazil.

Lesson: when control is reduced to a document rather than an effective verification of occupant load, materials and exits, the result can be catastrophic.

Grenfell Tower — London, United Kingdom (June 14, 2017)



Grenfell Tower on fire, June 14, 2017. Photo: Natalie Oxford, CC BY 4.0, via Wikimedia Commons.

The fire in the residential tower caused **72 deaths**. Since 2005, the United Kingdom has operated a model in which the "responsible person" for each building must carry out or commission its own fire risk assessment (Regulatory Reform (Fire Safety) Order 2005). The final report of the public inquiry (Phase 2, September 4, 2024) concluded that the fire was the culmination of **decades of failure** by government and industry; that the deregulation agenda prevented the regime from being corrected; that industry self-regulation efforts were ineffective; and that the tower's fire risk assessor **was not qualified** for a building of that size and complexity. Its recommendations include creating a **mandatory system of accreditation of the competence of fire risk assessors** [17].

Earlier, the independent review commissioned by the British government (Hackitt, 2018) had described the sector's culture as a **"race to the bottom"**, in which cost and speed prevail over safety [16].

Lesson: the United Kingdom is the best-documented example of what happens when fire risk assessment rests with the owner and with assessors without demonstrated competence. Its response after the tragedy was more regulation, more certified competence and a specialized regulator, not less.

Wang Fuk Court — Hong Kong (November 26, 2025)



Wang Fuk Court towers on fire, November 26, 2025. Photo: OceanHok, public domain (CC0), via Wikimedia Commons.

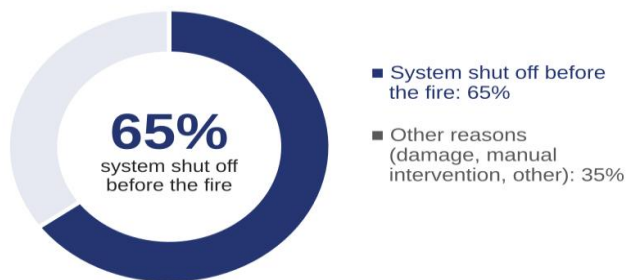
The fire, which spread through seven residential towers under renovation, left **168 dead** and is the deadliest in Hong Kong in decades. Before the independent committee of inquiry, its counsel stated that "on the day of the fire, **almost all the fire safety systems intended to protect lives failed due to human factors**"; the evidence presented indicates that alarms and hose systems had been disabled [23].

Lesson: the fact that a building **has** fire protection systems does not mean they **work**. What saves lives is a system that is operational on the day of the event, and that can only be ensured through verified inspection, testing and maintenance.

Statistical evidence from the United States

According to NFPA, when automatic sprinklers are present and the fire is large enough to activate them, they operate in 91% of cases and are effective in 96% of those. But when they **do not operate**, the most frequent reason (65% of failures) is that **the system had been shut off before the fire** [15]. In other words, the typical failure is not one of design, but a human and maintenance failure: exactly what a periodic inspection detects and what a self-declaration conceals.

Why sprinklers fail when they do not operate



Source: NFPA, U.S. Experience with Sprinklers (Hall, 2011).

Figure 5. The typical failure is human and maintenance-related, not a design failure. Prepared by ANRACI with NFPA data.

3.4 Illustrative scenarios in Bogotá

The following scenarios do not describe real cases; they illustrate frequent situations that the technical experience of ANRACI and inspectors finds in the field, and that are difficult to detect through a form or a photograph:

Scenario	What the self-declaration "says"	What a competent inspector finds
Neighborhood restaurant on a ground floor	It has a fire extinguisher and signage.	Extinguisher with an agent unsuitable for cooking grease, LPG cylinders next to the exit, uncleaned hood and only exit obstructed by tables.
"Retail" premises in a mixed-use locality	Low-risk commercial activity.	Storage of paints and solvents in quantities that make it high risk, on the ground floor of a multifamily residence.
Condominium building	It has a fire protection network and hose cabinets.	Pump without maintenance and without pressure, valve closed, fire doors propped open, stairway used as storage.
Warehouse or workshop	It has smoke detectors (photo).	Detectors not connected to the panel, panel in fault, makeshift and overloaded electrical installations.

In all cases, the owner may be acting in good faith: they simply do not know that what they have does not comply. That is the central point of the next chapter.

4. The technical component: fire protection is engineering

4.1 Engineering, not a checklist

Fire protection is an engineering specialty aimed at the comprehensive management of fire risk in buildings, infrastructure and production processes, with three goals: protecting life, protecting assets and ensuring the continuity of operations [2]. In Colombia it is regulated by, among others, Titles J and K of NSR-10 (the Colombian Earthquake-Resistant Construction Regulation), which incorporate by reference standards such as NFPA 10, 13, 14, 20, 25, 72 and 101; RETIE (the Technical Regulation for Electrical Installations); and Law 1575 of 2012 [2][3].

Verifying compliance requires criteria that a non-specialist does not have: occupancy classification and occupant load; number, width and travel distance of exits; compatibility of the extinguishing agent with the hazard; pressure and flow tests of the network; condition of the fire pump; valve supervision; operability of the detection panel; compartmentation and protection of penetrations; exempt quantities of hazardous materials; condition of electrical installations. As ANRACI's White Paper on Safe Construction points out, in certain components the review has already become a "notarial" procedure instead of an engineering technical assessment, and that is precisely the problem that must be corrected [3].

4.2 Subjectivity and the limits of self-assessment

A self-review form and a photographic record make it possible to verify **presence**, not **operation**. A photograph of a hose cabinet does not show whether there is pressure in the network; one of a detector does not show whether it is connected; one of a door does not show whether it opens in the direction of egress or whether it remains clear during operating hours. In addition, the assessment depends on the interpretation of whoever completes it, without uniform criteria, and leaves no technical traceability that would allow the authority to set priorities.

4.3 The conflict of interest

Whoever requests the certificate wants to open their business, operate and generate income; they want to do so soon and at the lowest possible cost. None of these aspirations is objectionable, but they all point in the same direction: declaring that everything is fine. This does not imply bad faith; it implies incentives. It is the same reason why Law 1796 of 2016 introduced **independent** technical review and supervision in construction, and why ANRACI's White Paper identifies as a structural gap the fact that construction supervision is hired and paid for by the builder [2][3].

The interested party is not a good inspector

They meet three conditions that disqualify them as verifiers of their own safety: **they generally lack the technical competence**; **they have an interest in the outcome** (opening and operating); and **they have an interest in keeping costs down**. None of the three is a moral failing, but together they make self-inspection an unreliable mechanism for protecting third parties.

4.4 Inspecting according to risk, not according to locality

Today, inspection management is largely organized by stations and territories. ANRACI proposes complementing that scheme with **specialized teams by type of risk** that inspect the highest-severity sectors throughout the city, regardless of locality: chemical industry, manufacture and storage of paints and solvents, flammable liquids and gases, facilities covered by the Major Accident Prevention Program (Decree 1347 of 2021), logistics centers, hospitals and buildings with large crowds. This gives priority to the **inspector's specialized knowledge** over their geographic location, which is what NFPA 1730 and the OECD principles recommend [12][13].

4.5 Beyond the establishment: electricity, gas and condominium buildings

The gas model works

Periodic gas inspection is today the best Colombian example of a well-designed building safety control: a defined frequency (five years), a competent and impartial third party (an inspection body accredited by ONAC), freedom for users to choose it, and a clear consequence for non-compliance (suspension of service for safety reasons) [10].

Electrical risk deserves the same

Electrical faults were the leading origin of structural fires in Bogotá in the 2014–2021 series (33.16%) and accounted for about a quarter of those with a determined cause in 2025 [2]. However, there is no obligation to periodically inspect the electrical installations of the existing building stock, particularly residential buildings [2]. ANRACI proposes a **periodic inspection of electrical installations**, for example every five years, carried out by accredited inspectors or bodies under RETIE, with suspension of supply as the ultimate consequence of non-compliance, as with gas.

Condominium buildings, a priority

In a residential building or complex, dozens or hundreds of people live together and depend on the same means of egress and the same systems. NFPA 1730 classifies multifamily dwellings and high-rise buildings as **high-risk** occupancies [13]. ANRACI proposes specific mechanisms for condominium buildings: periodic inspection of common areas and systems (fire protection network, pumps, detection and alarm, stairways, fire doors, emergency lighting) by an accredited third party, with the property manager responsible for hiring it, keeping the records and correcting the findings, within the framework of Law 675 of 2001.

Commerce, offices, institutions and industry

For the commercial, business, corporate, institutional and industrial sectors, inspection must **add value**: deliver a technical report useful for risk management, business continuity and insurance, and not just a certificate. That is the approach of the Singapore and Mexico City models, where the report of a professional or accredited third party becomes the basis for the permit [18][21].

5. Good faith, shared responsibility and the limits of self-management

5.1 Good faith is not absolute

Article 83 of the Constitution presumes the good faith of private parties in their dealings with the authorities. ANRACI does not dispute this. But the Constitutional Court has specified that good faith **is not an absolute principle**: it must be weighed against other principles, especially the protection of the general interest, and a periodic technical verification measure —such as vehicle roadworthiness inspection— does not violate it when it seeks to reduce a risk to third parties [6].

5.2 Good faith is not competence

The problem with self-inspection is not that citizens lie; it is that, even acting in complete good faith, **they do not know what they do not know**. An honest shopkeeper may sincerely declare that their establishment complies, when their fire extinguisher is the wrong type or their only exit does not have the required width. Good faith protects intention; it does not make up for technical knowledge.

5.3 Private parties performing public functions: yes, but competent and independent

Colombian law allows private parties to perform administrative functions, but under certain conditions: they must be expressly authorized, under the terms and controls set by law, and the authority that assigns the function retains its direction and control (Law 489 of 1998, arts. 110 and 111; Ruling C-866 of 1999) [9]. Urban planning offices (curadurías urbanas), Automotive Diagnostic Centers and gas inspection bodies are examples of private parties that verify compliance with safety standards **on third parties**, with accredited competence and under State oversight.

Self-inspection is something different: it does not transfer the function to a competent and impartial private party, but to the **interested party itself**, which becomes judge in its own case. That is an elementary limit of any verification scheme.

5.4 Shared responsibility, properly understood

ANRACI shares the shared-responsibility guideline in Article 3 of the project, correctly understood:

- The owner or manager is responsible for **maintaining** safety conditions and systems, **keeping** inspection, testing and maintenance records, **training** their staff and **hiring** verification when appropriate.
- **Verification** that those conditions are met is the responsibility of the authority or of a competent, independent and accredited third party, under the authority's oversight.

This is how benchmark systems work: in Singapore, the owner must hire a professional engineer to verify their systems before renewing the certificate [18]; in Hong Kong, owners of older buildings must appoint a registered inspector [19]; in Colombia, gas users choose and pay the accredited body [10]. Shared responsibility is not self-certification.

6. ICC knowledge: the technical basis for Bogotá to build and maintain better



Among all the references reviewed, ANRACI considers that the **International Code Council (ICC)** offers the most complete technical basis to resolve what Draft Agreement 874 leaves open: who verifies, how often, with what competence, what falls to the owner, and what to do with buildings constructed before current standards. Three reasons explain this:

- **It is a complete and coordinated system.** The I-Codes are an integrated family of model codes covering new buildings (IBC), fire protection (IFC), existing buildings (IEBC) and property maintenance (IPMC), among others. They are updated every three years through a public and open process.
- **It is available in Spanish and open for consultation.** The IFC, IEBC and IPMC have 2024 editions in Spanish, available online on the ICC codes platform [32][33][34]. The citations in this chapter were verified in those editions.
- **It is already part of Colombia's regulatory direction.** NTC 1500:2023 is a modified adoption of the International Plumbing Code; ICONTEC Technical Committee 623 is working on the adoption of the IFC as a Colombian Technical Standard; and the update of the NSR would take the IBC and the IFC as references [3]. What Bogotá adopts today as a reference will be aligned with what the country adopts tomorrow.

The ICC's central message is simple: **the safety of a building does not end on the day it is built.** The stated purpose of the IFC is to establish minimum requirements for a reasonable level of life safety and property protection from fire and explosion hazards **in new and existing buildings**, as well as for firefighter safety (IFC, 101.3) [32].

ICC code	What it regulates	Contribution to the DA 874 debate
IFC — International Fire Code	Prevention, fire protection and life safety in new and existing buildings, including their operation and maintenance.	Inspection authority; reports from approved agencies; operational permits by activity; maintenance and records; systems out of service; requirements for existing buildings (ch. 11).
IEBC — International Existing Building Code	Repair, alteration, change of occupancy, addition and relocation of existing buildings.	Rules for changes of use; performance evaluation with 20 safety parameters.
IPMC — International Property Maintenance Code	Ongoing maintenance of existing structures and premises, with a chapter on fire safety.	Owner's obligation to provide and maintain; continuous and unobstructed exits.
IBC — International Building Code	Design and construction of new buildings.	Technical basis of the future NSR; the day-one safety that the IFC and IPMC preserve.

Source: ANRACI, based on the 2024 Spanish editions of the IFC, IEBC and IPMC [32][33][34].

ICC codes cover the entire life of a building

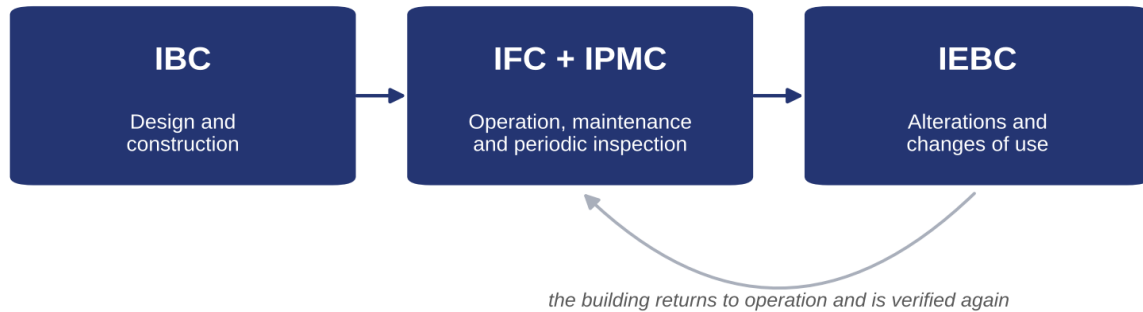


Figure 6. The ICC family of codes regulates a building throughout its service life. Prepared by ANRACI.

6.1 IFC: a code for the entire life of a building

Eight elements of the 2024 IFC respond directly to the questions left open by the draft agreement:

1. It applies to existing buildings

Its administrative, operational and maintenance provisions apply both to conditions and operations arising after its adoption and to **existing conditions and operations** (102.2). In addition, **Chapter 11, "Construction Requirements for Existing Buildings"**, applies to buildings constructed before the adoption of the code, with the purpose of providing a minimum degree of fire and life safety to their occupants (1101.1 and 1101.2). When a building does not comply, the authority notifies the owner, who must take the measures within the established time frames (1101.4). The minimums cover, among others, emergency responder communications, elevators, vertical openings, sprinklers in specific occupancies and in high-rise buildings, standpipes, fire alarms, smoke alarms, carbon monoxide detection and means of egress: exit sign illumination, emergency power, guards, doors, stairways, corridors, dead ends and travel distances [32]. **The IFC does not accept that a building be left out because it was built earlier.**

2. A clearly identified technical authority

The IFC starts by creating an agency responsible for implementing, administering and enforcing the code, under the **fire code official** (103.1), who has the authority to determine compliance and interpret the code through policies and procedures, without waiving its requirements (104.2) [32]. In Bogotá, that authority could be UAECOB.

3. The authority inspects and approves reports from approved agencies

The fire code official may carry out the inspections deemed necessary and **approve inspection reports prepared by approved agencies or responsible individuals**; those reports are submitted in writing for review and approval, and must be **certified by the responsible officer** of the agency or by the individual (109.2) [32]. This is exactly the model of mass coverage through accredited third parties that ANRACI proposes: **inspection is expanded with competent third parties, but the authority retains control and no one certifies themselves.**

4. Special risk is controlled by activity: operational permits

Section 105.5 requires **operational permits** for more than fifty special-risk activities, including: combustible and flammable liquids, LP gas, hazardous materials, spraying or dipping of paints and coatings, high-piled storage, cutting, welding and hot work, energy storage systems and **lithium batteries**, combustible dust-producing operations, industrial ovens, woodworking plants, waste handling and **places of public assembly** [32]. The requirement depends on **what is done** in the building, not where it is or when it was built. That criterion is the basis of the **specialized teams by type of risk** proposed by ANRACI.

5. The owner maintains, tests and records

Every required protection feature must be continuously maintained (110.1); equipment requiring periodic testing must be tested (110.2); and records of inspections, tests and maintenance must be kept **for not less than 3 years**, available to the authority, which may set their format and require that they be submitted (110.3). Fire protection and life safety systems must be **in an operative condition at all times** (901.6), inspected and maintained in accordance with the standards in Table 901.6.1 — including NFPA 10, 25, 72, 80 and 2001—, and their records must be kept for the entire service life of the installation (901.6.3) [32].

6. A system out of service is an emergency

When a required system is out of service, the fire department and the authority must be notified immediately, and the authority may require evacuation or a fire watch for the duration of the impairment (901.7) [32]. This is the direct regulatory response to the Wang Fuk Court case, where alarms had been disabled.

7. Owner responsibility and powers in the face of danger

Correcting violations is the owner's responsibility, and the occupant is responsible for the hazardous conditions they create or allow (113.2). Faced with a clear threat to life, the authority must issue the orders necessary to correct it (115.1), and may authorize the **disconnection of utility services** to eliminate an immediate hazard (111.1) [32]. The IFC thus combines shared responsibility with effective authority.

8. Shared responsibility takes shape in plans, drills and training

Chapter 4, "Emergency Planning and Preparedness", requires, depending on the occupancy, fire safety, evacuation and lockdown plans (404), evacuation drills with defined frequency and records (405) and employee training upon hire and **at least once a year** (406.2) [32].

The IFC also evolves with new risks: its 2024 edition incorporates provisions on energy storage systems, lithium-ion batteries, charging of micromobility devices, flammable refrigerants and the requirement for carbon monoxide detection in all occupancy types [32].

6.2 IEBC: the code for existing buildings

The International Existing Building Code applies to the **repair, alteration, change of occupancy, addition and relocation** of existing buildings (101.2). Its purpose is to provide flexibility through alternative approaches to meet minimum requirements, without sacrificing a reasonable level of safety (101.3) [33]. Two of its contributions are central for Bogotá:

- **Changes of occupancy (Chapter 10).** A change of occupancy that modifies the required fire protection thresholds cannot be made without the authority's approval, and requires a certificate of occupancy once compliance has been verified (1001.2) [33]. The IFC reinforces the rule: the use must not be changed unless the IFC and the IEBC are complied with (102.3) [32]. It is the answer to the risk described in ANRACI's White Paper on Safe Construction, when "a house becomes a warehouse, an office becomes a school, a shop becomes a restaurant" [3].
- **Performance evaluation (Chapter 13).** It seeks to maintain or increase the level of safety of an existing building that is altered or changes use (1301.1), by means of a score based on **20 parameters** in three categories —fire safety, means of egress and general safety—: height and area, compartmentation, separations, corridors, vertical openings, HVAC systems, detection, alarm, smoke control, capacity and number of exits, dead ends, travel distance, elevators, emergency lighting, mixed occupancies, sprinklers, standpipes, incidental uses and smoke compartmentation. The evaluation is submitted to the authority, which reviews and approves it [33][40].

What the IEBC shows

If the model code for existing buildings needs **20 technical parameters**, reviewed by the authority, to establish whether an existing building is acceptably safe, a self-review form completed by the owner cannot fulfill that function.

6.3 IPMC: maintenance as an owner's obligation

The International Property Maintenance Code establishes minimum requirements for safety and property protection insofar as they depend on the use and **continued maintenance** of structures, and requires that those that do not comply be altered or repaired (101.3) [34]. Its Chapter 7 provides that the owner must **provide and maintain** fire safety facilities and equipment (701.2); that there must be a safe, continuous and unobstructed path of travel to the public way (702.1); and that fire protection systems must be maintained in accordance with the IFC, in an operative condition, and repaired or replaced when defective (704.1) [34].

The IPMC illustrates how the ICC understands **shared responsibility**: the obligation to maintain belongs to the owner, and compliance is verified by the authority. Both coexist; neither replaces the other.

6.4 People: inspectors with certified competencies

The ICC certifies by examination the professionals who apply its codes, including **Fire Inspector I and Fire Inspector II**, certifications accredited by the Pro Board for exams taken since 2013, as well as plans examiners and property maintenance inspectors [35]. This is the ICC's answer to the question of who may inspect: **a person whose competence has been independently assessed**. This scheme is compatible with the certification of persons under ISO/IEC 17024 within Colombia's National Quality Subsystem and is a direct reference for the profile of UAECOB inspectors and accredited third parties.

6.5 Technology: recommended practices for remote inspection

In August 2020, the ICC published the *Recommended Practices for Remote Virtual Inspections*, a guide for jurisdictions to implement consistent remote inspection programs, with good practices for

scheduling, user preparation, site identification, communication of results and record keeping [42]. Together with NFPA 915 [29], it is the reference for the "formula 2" of mass coverage in chapter 8: a rule-based remote inspection, conducted by the authority or by a competent third party.

6.6 The value of applying modern codes

The U.S. National Institute of Building Sciences (NIBS) estimated that designing to the 2018 I-Codes saves **\$11 for every \$1 invested**, compared with earlier requirements, in mitigating natural hazards [41]. Although that figure does not refer to fires, it illustrates a principle that applies to them as well: **applying and enforcing up-to-date codes is an investment, not a cost.**

6.7 What the ICC contributes to Draft Agreement 874

ICC provision	Application in Bogotá
Application to existing conditions (IFC 102.2) and minimums for existing buildings (IFC ch. 11).	No building is left out for being old; progressive minimums with deadlines.
Agency and code official with technical powers (IFC 103 and 104).	UAECOB as the technical authority that interprets, sets procedures and enforces.
Reports from approved agencies, certified by their responsible officer (IFC 109.2).	Mass coverage through third parties accredited by ONAC, under UAECOB control.
Operational permits by activity (IFC 105.5).	Specialized teams by type of risk throughout the city.
Maintenance, testing and records for 3 years (IFC 110, 901.6).	Shared responsibility with verifiable obligations and records on a platform.
Systems out of service (IFC 901.7).	Mandatory notification and compensatory measures.
Plans, drills and annual training (IFC ch. 4).	Enforceable preparedness according to occupancy.
Changes of occupancy (IFC 102.3, IEBC ch. 10).	Effective control of changes of use.
Certified inspectors (Fire Inspector I and II).	Competency profile for public inspectors and third parties.
Recommended practices for remote inspection.	Virtualizing inspection with rules, not with photographic self-declarations.

An opportunity for the city

As ANRACI's White Paper on Safe Construction points out, "Colombia does not have to invent what the world has already learned with effort and, many times, with pain" [3]. Bogotá can get ahead of the national process and take the IFC and the IEBC — available in Spanish and in the process of being adopted as Colombian technical standards— as the technical basis for its inspection model.

ANRACI places at the city's service its agreements and cooperative relationship with the ICC, and can coordinate working sessions among the City Council, UAECOB and the ICC to learn what the Council offers around its codes: inspector training and certification, technical assistance in adoption processes and implementation tools.

7. International good practices

7.1 OECD: risk-based inspections, not the elimination of inspections

The **OECD Best Practice Principles for Regulatory Enforcement and Inspections** (2014) and its Toolkit (2018) are the international reference for reforming inspection systems [12]. Its eleven principles include: evidence-based enforcement; selectivity; **risk focus and proportionality** ("the frequency of inspections and the resources employed should be proportional to the level of risk"); responsive regulation according to the profile and behavior of each regulated entity; long-term vision; coordination; transparent governance; information integration and use of technology; clear and fair process; compliance promotion; and **professionalism** of inspectors.

Taken together, these principles support ANRACI's proposal and not that of the project as currently drafted:

- They call for **concentrating** inspections where risk is highest, not eliminating them where risk exists.
- They call for decisions on what to inspect to be based on **data** —which requires subsequent verification to be systematic and measurable, not optional.
- They call for **professional and competent** inspectors, something self-inspection cannot guarantee.
- They recognize that the risk-based approach makes it possible to inspect "less in quantity, but not necessarily in quality" [12].

7.2 United States: codes, Fire Marshals and minimum frequencies by risk

In the United States, states and municipalities adopt a fire code (NFPA 1 or the ICC's International Fire Code, analyzed in chapter 6) and, in most states, there is a **State Fire Marshal** who adopts the code, certifies inspectors and installers and investigates fires [2]. **NFPA 1730** (organization and deployment of fire prevention inspection) classifies existing occupancies by risk and sets minimum inspection frequencies [13]:

Risk	Examples according to NFPA 1730	Minimum frequency
High	Multifamily dwellings, high-rise buildings, hotels, dormitories, public assembly, child care, educational, health care, industrial; and critical infrastructure	Annual
Moderate	Ambulatory health care; industry that does not handle hazardous materials above exempt quantities	Every two years
Low	Storage, mercantile and business	Every three years

Source: NFPA 1730 (2019 ed.), definitions 3.3.3 and Annex A; frequencies according to NFPA 1 §10.2.7 applied, e.g., by the Florida Fire Prevention Code [13].

Three elements of the model are relevant for Bogotá: (i) even **low** risk has a minimum periodic inspection by the authority; (ii) many jurisdictions require companies that perform inspection, testing and maintenance (NFPA 25, NFPA 72) **to report their results on platforms** reviewed by the Fire Marshal, so that the technical information is produced by a competent third party and not by the owner; and (iii) inspector competencies are standardized.

The evidence on the effect of inspection is long-standing and consistent. The classic study by Hall, Koss and Schainblatt (1979), sponsored by NFPA and the National Science Foundation, found that cities in which a substantial share of buildings went several years without inspection, or were not regularly inspected, **tended to have higher fire rates** [14].

7.3 United Kingdom: the lessons of the self-assessment model

As explained in chapter 3, the United Kingdom based the fire safety of existing buildings on self-assessment by the "responsible person". After Grenfell, the country adopted the Fire Safety Act 2021 and the Building Safety Act 2022, created a specialized regulator (the Building Safety Regulator), and the public inquiry recommended mandatory accreditation of fire risk assessors [17]. In other words, the country with the most experience in self-assessment concluded that it needed to strengthen competence and external control.

7.4 Singapore: the owner hires, a professional verifies, the State certifies

In Singapore, under the Fire Safety Act of 1993, designated buildings must have a valid **Fire Certificate** to be occupied. Depending on the risk and the safety measures, the certificate is renewed every one to three years, and **a professional engineer must verify the operation of the safety measures before the authority (SCDF) approves the renewal**. Occupying without a valid certificate is an offense [18]. To reduce compliance costs, since April 1, 2026 the SCDF has extended the validity of renewals to three years [18].

Lesson: Singapore simplified by extending validity, not by eliminating independent verification. It is an example of streamlining done right.

7.5 Hong Kong: mandatory inspection of existing buildings

Since 2012, the Mandatory Building Inspection Scheme has required owners of buildings aged 30 years or more (except residential buildings of up to three stories) to appoint a **registered inspector**—an architect, engineer or surveyor with accredited experience—to inspect every **10 years** the common areas, façades and structural elements, including **fire safety elements**, and to supervise the necessary repairs [19]. The Wang Fuk Court case shows, in turn, that these schemes must be complemented with verification of active systems and control during renovation works [23].

7.6 Peru: sworn declaration, but with subsequent inspection

The Regulation on Technical Safety Inspections in Buildings (Supreme Decree 002-2018-PCM) classifies establishments into four risk levels. For **low and medium** risk establishments, the applicant submits a sworn declaration of compliance and obtains the license, but **the municipality then carries out the technical inspection (subsequent ITSE)** and only then issues the certificate; for **high and very high** risk, inspection is **prior**. The certificate is valid for two years [20].

Lesson: even the Latin American model closest to "self-management" maintains inspection of the establishment by the authority. The sworn declaration speeds up opening; it does not replace the visit.

7.7 Mexico City: accredited third parties with liability

Mexico City's Law on Comprehensive Risk Management and Civil Protection requires medium- and high-risk establishments to have an Internal Civil Protection Program prepared or endorsed by an

accredited third party (now the Official Civil Protection Officer) registered with the Ministry, who signs a letter of shared responsibility; a civil liability insurance policy is also required [21].

Lesson: the third party that certifies is accountable for what it certifies, with registration before the authority and the backing of insurance.

7.8 Comparative summary

Jurisdiction	Who verifies	Frequency	Role of the owner
United States (NFPA 1 / 1730)	Fire Marshal or fire department; certified companies report ITM	Annual (high), 2 years (moderate), 3 years (low)	Maintain systems and hire inspection, testing and maintenance.
United Kingdom	Responsible person / risk assessor (under review after Grenfell)	Periodic, according to risk	Self-assessment: a questioned model under reform toward mandatory accreditation.
Singapore	Professional engineer + SCDF	1 to 3 years	Hires the professional; cannot occupy without a certificate.
Hong Kong (MBIS)	Registered inspector	Every 10 years (buildings aged 30+)	Appoints the inspector and carries out repairs.
Peru (ITSE)	Municipality	2 years; prior for high risk, subsequent for low and medium	Sworn declaration + mandatory subsequent inspection.
Mexico City	Accredited third party / ROPC	According to the internal program	Hires the third party; civil liability insurance policy.
Colombia — gas	ONAC-accredited inspection body	5 years	Chooses and pays; service suspended for non-compliance.
Colombia — vehicles	Automotive Diagnostic Center	Periodic	Brings the vehicle in; cannot drive without a certificate.
Bogotá — DA 874	The interested party itself (low and moderate risk)	Not defined	Self-assesses; optional random visit, with no minimum.

7.9 What good practices have in common

1. Verification is **graded by risk**, but no risk level is left without verification.
2. Whoever verifies is **competent** (a professional, certified inspector or accredited body) and **independent** of the interested party.
3. The owner has **shared responsibility**: maintains, hires and pays; does not certify themselves.
4. The authority retains **direction, supervision and sanctioning powers**, and uses data to set priorities.

5. Simplification is achieved through **technology, differentiated validity periods and third parties**, not by eliminating verification.

8. Analysis of the project's guidelines

Article 3 of the project guides the review with four guidelines: mass coverage, self-management, virtualization and training, and frames them within the idea of shared responsibility. ANRACI analyzes them one by one:

Guideline	ANRACI's assessment	Condition for it to work
Mass coverage	Agrees with the goal.	Achieve it with competent inspection: accredited third parties and high-level technology, not by transferring inspection to the interested party.
Self-management	Disagrees, as a mechanism for obtaining the certificate.	Technical knowledge cannot be delegated. Replace it with shared responsibility with concrete obligations.
Shared responsibility	Agrees; it should be developed further.	Risk belongs to whoever creates it: maintenance, records, correction of findings and consequences for non-compliance.
Virtualization	Agrees.	It requires a very large technology investment; without it, paper is virtualized, not verification.
Training	Agrees.	It complements, but does not replace, inspection or the State's responsibility.

8.1 Mass coverage: covering everything, with competence

The goal of mass coverage is correct: **all buildings and establishments must be covered** by a verification scheme proportional to their risk. But the public sector's lack of operational capacity cannot be solved by handing responsibility to a private party who lacks the technical knowledge. **The State's shortcomings do not turn citizens into inspectors.**

There are three formulas for achieving mass coverage with competence:

Formula	How it works	Requirements and limitations	Assessment
1. Regulated delegation to accredited third parties	As with residential gas: a technician with certified competencies, linked to an inspection body accredited by ONAC that meets international standards (ISO/IEC 17020 and 17024), performs the inspection; UAECOB sets criteria, supervises, audits and issues the certificate.	It requires legal authorization: amending Article 42 of Law 1575 of 2012, as Law 1796 of 2016 did with independent review; then regulations, independence rules, a liability regime and fees. A model already proven in Colombia (gas, RETIE, vehicle roadworthiness inspection).	Core of the model.

Formula	How it works	Requirements and limitations	Assessment
2. Remote inspection with high-level technology	A competent inspector conducts, in real time, an interview with the user while the user captures on video what is actually there; the platform records location, time and evidence, and can be supported by analytics.	Heavy investment: platform, connectivity, storage, cybersecurity, data protection (Law 1581 of 2012) and training. It does not allow functional tests (pressure, pumps, alarms) and depends on what is shown.	Complement for low risk and follow-up of findings.
3. Increase UAECOB staff	Hire enough public inspectors to cover the entire universe.	Inspecting 1.5 million buildings every three years would require some 500,000 visits per year, more than 11 times the 44,000 of 2019 [24].	Not viable as the only solution.

Formula 2 deserves clarification. It is not a matter of the user uploading photographs to a form, as happens in self-management schemes, but rather a **remote inspection conducted by a competent inspector**, and/or supported by state-of-the-art technological tools such as artificial intelligence, with defined technical standards. In 2024, NFPA published the first edition of **NFPA 915** (*Standard for Remote Inspections and Tests*), which regulates the responsibilities of the owner, the contractor, the person performing the remote inspection and the authority, the location and time-stamp requirements for evidence, and the protection, retention and ownership of data [29]. Together with the ICC's recommended practices for remote inspection [42], it is the kind of reference that should guide any virtualization of inspection (see section 6.5).

The conclusion is to combine the formulas: **accredited third parties as the core** to expand coverage, **high-level remote inspection as a complement** for low risk and follow-up, and the **selective strengthening of UAECOB** for specialized high-risk teams, auditing of third parties and control.

8.2 Funding: the fire surcharge already exists

Bogotá has a source of funds earmarked for this purpose. **Agreement 927 of 2024** of the Bogotá City Council established the fire surcharge equivalent to **1% of the assessed industry and commerce tax (ICA)**, payable by taxpayers with net income above 43,498 UVT (tax value units) in the period, for the modernization of the Official Fire Department and the strengthening of prevention and response to fires, rescues and hazardous materials emergencies. According to the District Administration, as of July 31, 2026 about **COP 30 billion** had been collected [28].

At the same time, under the Development Plan "Bogotá Camina Segura", the technical certificate is **free of charge** for users [24]. If users do not pay and the city already collects a surcharge earmarked for prevention, **mass coverage with competent inspection should be funded with those resources**: for example, to cover inspection by accredited third parties of micro and small establishments and of lower-income condominium buildings, and to build the technology platform required for virtualization done right. Larger and higher-risk establishments could hire the third party directly, as with gas, with reference fees.

Note: a legal and budgetary analysis of the surcharge's earmarking is recommended to specify the mechanism for paying accredited third parties.

8.3 Self-management: technical knowledge cannot be delegated

Inspection is a technical act that requires training, experience and certified competencies. **Technical knowledge cannot be delegated to someone who does not have it:** a virtual training course and a form do not turn the owner of an establishment into an inspector of fire protection systems. That is why self-management as a mechanism for obtaining the technical certificate **is neither possible nor responsible**, much less for moderate-risk buildings, as Article 4 proposes.

ANRACI proposes eliminating self-management as a route to obtaining the certificate and replacing it with **shared responsibility**, understood as explained below. For low risk, self-review should be replaced by real-time remote verification conducted by a competent inspector, complemented by random visits.

8.4 Shared responsibility: risk belongs to whoever creates it

This is the concept the project should develop in depth. Law 1523 of 2012 establishes it clearly: risk management is the responsibility of all authorities and inhabitants, and the latter, "as co-responsible for risk management, shall act with caution, solidarity and self-protection, both personally and with regard to their property, and shall comply with the provisions of the authorities" (art. 2). Its **principle of self-preservation** provides that "every natural or legal person, whether governed by public or private law, has the duty to adopt the measures necessary for adequate risk management in their personal and functional sphere" (art. 3, num. 4) [30]. Decree 2157 of 2017, in turn, requires risk management plans from public and private entities whose activities may create risk [31].

In other words: **risk belongs to whoever creates it**, and it is they who must manage it. This is a culture that is underdeveloped in Colombia. The example of the vehicle shows it: day by day the driver feels the car braking less, does not maintain it, and one day the crash happens. That was not an accident: **it was foreseeable and could have been avoided**. The same happens in buildings with the expired extinguisher, the network without pressure, the overloaded electrical installation or the exit turned into a storeroom. The fact that 81.7% of structural fires in Bogotá are classified as "accidental" [2] does not mean they were inevitable; it means, for the most part, that they were foreseeable.

Shared responsibility, properly understood, does not transfer the State's inspection function to private parties; it assigns them **concrete and verifiable obligations**:

- **Maintain** fire protection systems in accordance with applicable standards (for example, NFPA 10, 25 and 72), with a maintenance program carried out by competent personnel.
- **Record**: keep an inspection, testing and maintenance log available to the authority and to the accredited third party.
- **Prepare** its occupants: emergency plan, emergency brigade where applicable, drills and training.
- **Hire** verification when applicable and **correct** findings within the set deadlines.
- **Be accountable**: bear the consequences of non-compliance, with the corrective measures and sanctions provided for in Law 1801 of 2016.

8.5 Virtualization: necessary, but it requires a very large investment

ANRACI supports virtualization. But two things must be distinguished: **virtualizing the procedure** (application, payment, scheduling, delivery of the certificate) is relatively simple and should be done

now; **virtualizing verification** is far more demanding. For it to work well, a very large technology investment is needed: an integrated platform, interoperable with the Chamber of Commerce, the Finance Department, the Cadastre and Planning offices; data-based risk classification; georeferencing; mobile tools for inspectors and third parties; remote video inspection with technical standards; analytics; artificial intelligence; cybersecurity and data protection; and ongoing support.

Without that investment, virtualization degenerates into what is seen today: forms and photographs uploaded by the interested party. **That is not virtualizing inspection; it is virtualizing paper.** That is why virtualization must be planned, budgeted —funded, among other sources, by the fire surcharge— and implemented in stages.

8.6 Training: necessary, but it does not replace inspection

Training owners, managers, workers and brigades is valuable and should be expanded: it improves day-to-day prevention, initial response and risk culture. But a trained person is not an inspector, and a few hours of virtual training are not equivalent to the certified competencies that inspection requires (such as those established for inspectors in NFPA 1031, now integrated into NFPA 1030). Training **should not relieve the State of its responsibility for inspection**, which Law 1575 of 2012 assigns to fire departments [4].

9. ANRACI's proposal

ANRACI proposes that Draft Agreement 874 of 2025 keep its goals of mass coverage, virtualization and training, but replace self-management as a substitute for inspection with a **verification model by risk level with competent third parties**. The proposal develops components 4 and 5 of the White Paper on Fire Protection (professionalization and certification; regulated delegation of the function to certified agents) and lines 4 and 5 of the White Paper on Safe Construction (buildings that are safe throughout their life; competent and accountable people) [2][3].

The proposal combines measures at three levels: those that fit in the Agreement, those that UAECOB can adopt in its management, and those that require national regulation. Chapter 10 distinguishes them in light of the applicable legal framework.

9.1 Verification model by risk level

No risk level is left without technical verification



Figure 7. Verification model by risk level proposed by ANRACI.

Level	Verification mechanism	Who verifies	UAECOB control
Low	Real-time remote verification, conducted by a competent inspector, with prior training of the user. No self-review.	UAECOB inspector.	Random on-site visits, minimum 20% per year, prioritized by data. Each establishment receives a visit at least every 5 years.
Moderate	On-site inspection. No self-management.	UAECOB; in the future, an ONAC-accredited inspection body, once the law allows it.	Issues the certificate based on the report; audits third parties.
High	On-site inspection + periodic inspection, testing and maintenance reports on the systems.	UAECOB (specialized teams) with support from accredited third parties.	Certificate with prior visit; follow-up of findings.

Level	Verification mechanism	Who verifies	UAECOB control
Special	Specialized inspection throughout the city, regardless of locality.	UAECOB specialized teams (chemicals, paints, solvents, flammables, PPAM, health care, crowds, high-rise condominiums).	Annual inspection program by sector.

9.2 Accredited third parties

Third-party participation in the inspection function requires legal authorization, because Article 42 of Law 1575 of 2012 assigns that competence to fire departments, and assigning public functions to private parties requires a law (Constitution, arts. 123 and 210; Law 489 of 1998, arts. 110 and 111). It is therefore proposed as a national reform, with these features:

- Inspection bodies accredited by **ONAC** under ISO/IEC 17020, preferably with type A independence requirements, and inspectors with competencies certified under ISO/IEC 17024, following the model already proven in gas, RETIE and vehicle roadworthiness inspection.
- **Prohibition on inspecting what one designed, installed or maintains**, to avoid conflicts of interest.
- **UAECOB retains authority**: it sets the criteria and formats, operates the platform, issues the certificate based on the report, audits third parties and imposes sanctions.
- Freedom for users to choose the body, reference fees and a professional liability insurance policy for the third party.

9.3 Periodic inspection of electrical installations

A periodic inspection of electrical installations in existing buildings, starting with condominium buildings and establishments open to the public, by accredited inspectors or bodies under RETIE, with a scheme similar to the gas inspection, in which unsafe results will lead to disconnection of the utility service.

9.4 Condominium buildings

Establish guidelines for the periodic inspection of common areas and of the fire protection and life safety systems of condominiums, with responsibility on the property manager and verification by an accredited third party, prioritizing high-rise buildings and complexes with higher occupancy.

9.5 Information and accountability

Use UAECOB's platform not only to issue certificates, but to **classify risk, prioritize inspections and measure results**, in coordination with the Mandatory National Fire Statistics System proposed by ANRACI [2]. UAECOB should report annually to the City Council the number of certificates issued through on-site and remote verification; subsequent verification visits; findings; and the trend in fires by occupancy type.

9.6 The ICC as a technical reference

- Take as technical references for the inspection of existing buildings the **2024 IFC in Spanish** (in particular its chapters 1, 4, 9 and 11), the **IEBC** for changes of use and interventions, and the

IPMC for maintenance obligations, in harmony with NSR-10 and with the Colombian technical standards adopted by ICONTEC.

- Adopt the IFC's scheme of **permits or controls by risk activity** to define the scope of the specialized teams.
- Use ICC certifications (Fire Inspector I and II) as a reference for the competency profile of inspectors, aligned with the certification of persons under ISO/IEC 17024.
- Design remote inspection in accordance with the ICC's recommended practices and NFPA 915.
- Promote a **UAECOB – ICC – ANRACI** alliance for training, knowledge transfer and technical assistance.

9.7 Funding

Seek that, in accordance with its legal earmarking, the resources of the fire surcharge (Agreement 927 of 2024) support mass coverage with competent inspection: payment for inspections by accredited third parties for micro and small establishments and lower-income condominium buildings, a technology platform and remote inspection, and strengthening of UAECOB's specialized teams and auditing (see section 8.2).

10. Legal analysis and proposed amendments to the articles

A good technical argument only becomes law if it respects the Council's powers and sound drafting technique. This chapter analyzes the applicable legal framework, identifies which proposals can be included in the Agreement and which must be pursued through other channels, and presents an amendment to the articles that is **deliberately short**: it keeps the structure of the text approved in first debate and changes only what is necessary.

Note: this analysis is a technical input from ANRACI. It is recommended that it be reviewed by a lawyer specializing in administrative law before it is submitted as a list of amendments.

10.1 Applicable legal framework

Provision	What it establishes	Implication for the articles
Constitution, arts. 2 and 11	The authorities protect life; the right to life is inviolable.	It grounds the preventive nature of inspection.
Constitution, art. 83	Presumption of good faith, which is not absolute (Ruling C-131 of 2004).	It allows technical verification without violating good faith.
Constitution, art. 84	If an activity is regulated in general terms, no additional permits, licenses or requirements may be demanded.	The Agreement cannot create new obligations for private parties (e.g., hiring third parties or additional inspections).
Constitution, arts. 123 and 210; Law 489 of 1998, arts. 110 and 111	Private parties only perform public functions in the cases and under the conditions set by law.	Third-party inspectors require legal authorization; an agreement is not enough.
Constitution, arts. 313 and 322; Decree-Law 1421 of 1993, arts. 8 and 12 (num. 1 and 25)	The Council issues rules for the proper performance of the District's functions and the provision of its services.	Power to set guidelines for UAECOB within the legal framework.
Decree-Law 1421 of 1993, art. 13	Certain agreements (administrative structure, budget, investments, revenues, among others) require the Mayor's initiative.	Avoid ordering structures, staffing, expenditures or earmarking of resources.
Decree-Law 1421 of 1993, arts. 22 and 23	Two debates; objection by the Mayor on grounds of inexpediency or illegality.	A sober text that gives no grounds for objections.
Law 819 of 2003, art. 7	Projects that order spending must state their fiscal impact.	Use guideline verbs and explain in the statement of reasons that there is no additional spending.
Law 1575 of 2012, art. 42 (amended by Law 1796 of 2016)	Fire departments are the competent bodies for life safety and fire prevention inspections.	UAECOB is the authority; the Agreement guides how it exercises that function.
Law 400 of 1997 and NSR-10; Resolution 661 of 2014; RETIE	The technical requirements for buildings, the fire department regulation and the electrical installations regulation are national in scope.	The Agreement cannot adopt technical regulations or regulate electrical installations.

Provision	What it establishes	Implication for the articles
Law 1523 of 2012, arts. 2 and 3	Shared responsibility and the principle of self-preservation.	Basis for the shared-responsibility guideline.
Law 1801 of 2016, art. 87	Safety conditions during economic activity.	The technical certificate verifies a permanent condition.
Law 962 of 2005, Decree-Law 019 of 2012 and Law 2052 of 2020	Procedures must be authorized by law, streamlined and digitized.	Do not create procedures; simplify the existing procedure.
Unity of subject matter (Constitution, arts. 158 and 169; Law 136 of 1994, art. 72)	All the articles must refer to a single subject, consistent with the title.	Exclude unrelated topics, such as electrical installations.
Agreement 927 of 2024	Fire surcharge and its earmarking.	Do not amend it through this Agreement; mention it in the statement of reasons.

Circular 025 of 2016 of the District Administration guides the review of draft agreements regarding competence, unity of subject matter, consistency between the title and the articles, and fiscal impact.

10.2 Assessment of the text approved in first debate

Article	What works	What needs adjustment
Art. 1. Purpose	It is correctly framed within Law 1575 of 2012.	Orient it toward results: life, property and the continuity of activities, not the certificate.
Art. 2. Responsible entity	It recognizes UAECOB as the authority.	Specify that its procedures follow technical regulations and recognized technical standards.
Art. 3. Guidelines	Mass coverage, virtualization and training are correct goals.	"Self-management" should be replaced by shared responsibility; the risk-based approach and technical competence are missing.
Art. 4. Certificate	It keeps the technical certificate.	It allows self-management to obtain the certificate, extends it to moderate risk and leaves verification as optional ("may"), with no minimum.
Art. 5. Entry into force	Correct.	—

10.3 Drafting criteria applied

- **Continuity:** it is presented as a list of amendments to the approved text; it keeps the title, structure and numbering, and only adds a follow-up article.
- **Competence:** all mandates are addressed to UAECOB and concern how it exercises the function assigned to it by Law 1575 of 2012.
- **No new procedures or obligations for private parties:** the text organizes the existing procedure and changes the form of verification carried out by UAECOB; it creates no requirements.

- **Technical neutrality:** it refers to recognized technical standards, without naming private organizations.
- **Unity of subject matter and consistency with the title:** unrelated topics are excluded.
- **Explicit and gradual fiscal impact:** for moderate and high risk, Article 4 reflects UAECOB's current practice, which already carries out visits [24]. Remote verification for low risk does require investment, so gradual implementation over 24 months is foreseen, which can be funded by the fire surcharge in accordance with its earmarking (Agreement 927 of 2024). The statement of reasons must include this analysis and the opinion of the District Finance Department (Law 819 of 2003).
- **Plain language:** short sentences, precise verbs ("shall issue", "shall carry out") where there is a mandate, and guiding verbs ("shall promote") where there is a guideline.

10.4 Comparative text

Article	Approved text	Proposed text
1. Purpose	... to establish guidelines aimed at guiding and strengthening the minimum conditions for the review of fire protection systems and improving life safety conditions with regard to the risks of structural fires and hazardous materials ...	... to establish guidelines aimed at guiding and strengthening the minimum conditions for the review of fire protection systems and of life safety conditions ..., in order to protect people's lives, their property and the continuity of activities against the risks of structural fires and hazardous materials.
2. Responsible entity	UAECOB ... may define the procedures for carrying out the review ...	UAECOB ... shall define the procedures for carrying out the review ... To that end, it shall comply with current technical regulations and may take as a reference nationally and internationally recognized technical standards and codes in the field.
3. Guidelines	a. Mass coverage. b. Self-management. c. Virtualization. d. Training.	a. Mass coverage with technical criteria. b. Risk-based approach. c. Shared responsibility. d. Virtualization of the procedure and remote verification conducted by competent personnel. e. Training as a complement to the review.
4. Technical certificate	Certificate for low and moderate risk that carry out virtual and/or visual self-management. Paragraph: UAECOB "may" carry out random visits.	Certificate always subject to prior technical verification by competent personnel: on-site for moderate and high risk; real-time remote for low risk. Paragraph 1: verification cannot be replaced by the interested party's declaration. Paragraph 2: random on-site visits to no less than 20% of remote verifications. Transitional paragraph: 24 months to implement remote verification.
5. Follow-up (new)	—	Annual report from UAECOB to the Council on certificates issued through on-site and remote verification, random visits and the trend in fires.
6. Entry into force	In force upon publication.	No changes (becomes art. 6).

10.6 Proposed text

DRAFT AGREEMENT 874 OF 2025

Text proposed by ANRACI for second debate

"ESTABLISHING GUIDELINES TO GUIDE AND STRENGTHEN THE MINIMUM CONDITIONS FOR THE REVIEW OF STRUCTURAL FIRE PROTECTION SYSTEMS IN BOGOTÁ D.C. AND ISSUING OTHER PROVISIONS"

THE CITY COUNCIL OF BOGOTÁ, CAPITAL DISTRICT,

in exercise of its constitutional and legal powers, especially those conferred by numerals 1 and 25 of Article 12 of Decree-Law 1421 of 1993,

HEREBY AGREES:

Article 1. Purpose. The purpose of this Agreement, within the framework of the powers established in Law 1575 of 2012, its amendments and implementing regulations, is to establish guidelines aimed at guiding and strengthening the minimum conditions for the review of fire protection systems and of life safety conditions in the buildings and commercial establishments of the Capital District, in order to protect people's lives, their property and the continuity of activities against the risks of structural fires and hazardous materials.

Article 2. Responsible entity. The Special Administrative Unit Official Fire Department (UAECOB), within the framework of the functions and powers defined in Law 1575 of 2012, its amendments and implementing regulations, shall define the procedures for reviewing the fire protection system and life safety conditions in the buildings and commercial establishments of the Capital District. To that end, it shall comply with current technical regulations and may take as a reference nationally and internationally recognized technical standards and codes in the field.

Article 3. Guidelines. To fulfill the purpose of this Agreement, the Special Administrative Unit Official Fire Department shall promote the review of the fire protection system and of life safety conditions, guided, among others, by the following guidelines:

- a. Mass coverage with technical criteria.** Expand the coverage of the review through verifications carried out by personnel with technical competence in fire protection and life safety.
- b. Risk-based approach.** Determine the form and frequency of the review according to the risk level of the building or establishment and of the activity carried out there, and prioritize those of higher risk based on the available information.
- c. Shared responsibility.** Promote that owners, managers and occupants keep fire protection systems and life safety conditions in working order, and keep the records of their inspection, testing and maintenance. Shared responsibility does not replace the review carried out by the Unit.
- d. Virtualization.** Encourage the virtualization of the application, follow-up and delivery of the technical certificate and, when technological conditions allow, remote verification conducted by competent personnel of the Unit.
- e. Training.** Promote knowledge of the minimum life safety and fire protection conditions, as a complement to the technical review.

Article 4. Technical certificate. The Special Administrative Unit Official Fire Department shall issue a technical certificate to buildings and commercial establishments that, following a technical verification carried out by competent personnel of the Unit, meet the minimum fire protection and life safety measures, in accordance with the current legal framework. For those categorized as moderate

and high risk, verification shall be on-site. For those categorized as low risk, it may be carried out remotely, provided it is conducted in real time by competent personnel of the Unit.

Paragraph 1. Technical verification may not be replaced by the mere declaration of the owner, manager or occupant.

Paragraph 2. Each year, the Unit shall carry out random on-site visits, prioritized according to risk, to no less than ten percent (10%) of the buildings and commercial establishments whose certificate was issued through remote verification.

Transitional paragraph. The Unit shall have a period of up to twenty-four (24) months from the entry into force of this Agreement to implement the remote verification referred to in this article.

Article 5. Follow-up. The Special Administrative Unit Official Fire Department shall submit an annual report to the Bogotá City Council on the implementation of this Agreement, including the number of certificates issued through on-site verification and through remote verification, the random visits carried out and their results, and the trend in structural fires by type of building.

Article 6. Entry into force. This Agreement shall enter into force on the date of its publication.

10.7 Proposal for the statement of reasons

The technical knowledge supporting the amendments should be placed in the statement of reasons, where it belongs. ANRACI suggests including, in essence, the following text:

Suggested text

The recognized technical standards and codes referred to in Article 2 include, among others, the model codes of the International Code Council (ICC): the International Fire Code (IFC), which regulates the fire safety of new and existing buildings throughout their service life, and the International Existing Building Code (IEBC), which regulates alterations and changes of occupancy. Both are available in Spanish and free to consult. The IFC is in the process of being adopted as a Colombian Technical Standard by ICONTEC, and the update of the NSR takes ICC codes as a reference.

These codes, together with the NFPA standards incorporated into NSR-10 and the OECD principles on risk-based inspections, show that the review must be graded according to risk, carried out by competent personnel and systematically verified. For moderate- and high-risk establishments, the project reflects the Unit's current practice. Remote verification of low risk, which replaces self-review, will be implemented gradually and can be funded with the resources of the fire surcharge under Agreement 927 of 2024, in accordance with its earmarking.

11. Conclusions

1. Life safety and fire protection inspection is a **preventive control of a risk to life**. Its procedure can and should be simplified; technical verification should not be eliminated or transferred to the interested party.
2. Colombian law already recognizes this logic: the Constitutional Court upheld vehicle roadworthiness inspection against the principle of good faith, and gas regulation requires periodic inspection by accredited bodies.
3. Bogotá faces a real fire risk, concentrated in housing and in dense localities, and mostly preventable.
4. Self-inspection faces two insurmountable limitations —lack of technical competence and conflict of interest— that good faith does not correct.
5. International good practices grade verification by risk and entrust it to competent, independent people; none leaves moderate risk to the interested party's declaration alone, and the Grenfell, Kiss and Wang Fuk Court tragedies show the cost of weak verification.
6. UAECOB's capacity gap is closed by expanding competent inspection with accredited third parties, high-level remote inspection and specialized teams, not by self-certification; and Bogotá already has the fire surcharge to fund it.
7. ICC knowledge —IFC, IEBC and IPMC— offers Bogotá a complete, up-to-date technical reference, available in Spanish and consistent with Colombia's regulatory direction, which supports each of the proposals in this document.
8. The amendment to the articles must be short and respect the Council's powers; ICC codes, accredited third parties and electrical inspection advance better through administrative and national channels.
9. The project must change its focus: **from the certificate to safety**. As long as the goal is a piece of paper, inspection will continue to be managed and perceived as an administrative procedure.
10. Shared responsibility must be deepened: risk belongs to whoever creates it, and whoever creates it must maintain, record, correct and be accountable, without relieving the State of its duty to verify.

ANRACI places its technical knowledge at the disposal of the Bogotá City Council, UAECOB and the District Administration to build a modern, agile and digital verification model that reduces unnecessary burdens without transferring to citizens a risk that the State has the duty to manage. As ANRACI's White Paper puts it: may no Colombian have to mourn the loss of a life, property or livelihood because of a preventable fire [2].

Editorial transparency statement

All the analyses, interpretations, conclusions, recommendations and proposals contained in this document are the product of ANRACI's intellectual work. During its preparation, artificial intelligence tools were used to support the search for and organization of information, source verification, drafting, style review and formatting.

Its approach, criteria and content were fundamentally directed by the ANRACI team, which bears sole technical and conceptual responsibility for the document. The original version of this document was written in Spanish; this English version is a translation produced with the support of artificial intelligence tools. In the event of any discrepancy, the Spanish version shall prevail.

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