



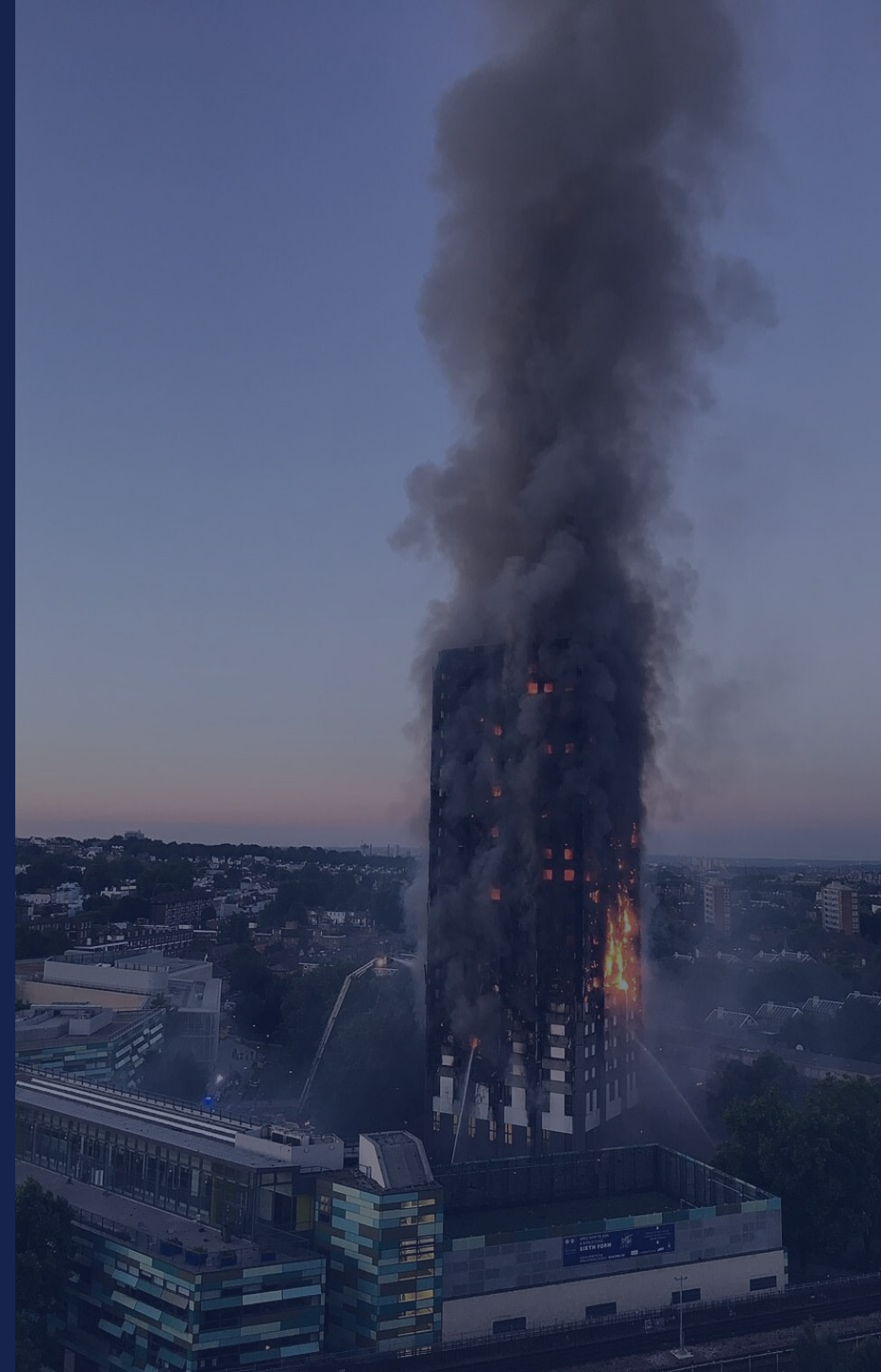
TECHNICAL AND INDUSTRY POSITION

Life safety and fire protection inspection is not a mere formality

It is a risk control for people's lives

Observations on Draft Agreement 874 of 2025 · Bogotá City Council
Bogotá D.C., October 2026

English translation prepared with the support of artificial intelligence tools. The original document is in Spanish, which prevails in case of discrepancy.



The question the City Council must answer

Who verifies, with what knowledge and with what independence, that a building occupied by people can protect them in the event of a fire?



Not the interested party

They generally lack the technical competence and do have an interest in the outcome.



Competent personnel

Inspectors with certified competencies, under the authority of the Fire Department.



Independently

Whoever verifies did not design, install or maintain what they inspect.

What Draft Agreement 874 of 2025 proposes



Self-managed certificate

For low- and moderate-risk buildings and establishments, "virtually and/or visually" (art. 4).



Optional verification

The Fire Department "may" carry out random visits, with no minimum percentage or frequency.



A safeguard was lost

Previous versions required verifying at least 10% each year. The approved text removed it.



Certificate-centered

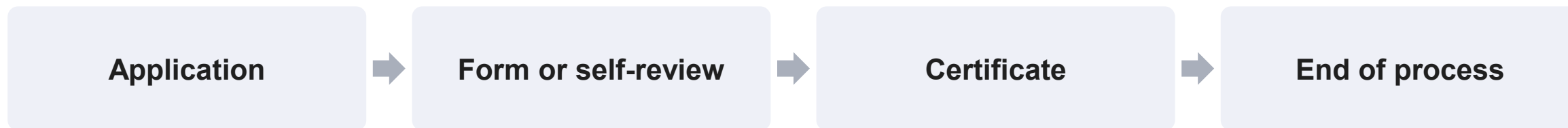
Its core is issuing more certificates, faster and with fewer visits.

Filed six times since 2023: DA 156, 522 and 650 of 2023 · 028, 256 and 545 of 2024 · 874 of 2025

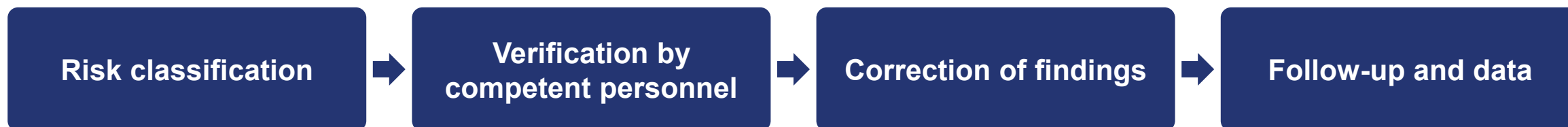
Source: Bogotá City Council, text approved in first debate (November 12, 2025); Fenalco, Notijurídicos 2023–2024.

The underlying problem: a paper-centered project

CURRENT APPROACH: THE CERTIFICATE



PROPOSED APPROACH: SAFETY



People's lives



Property



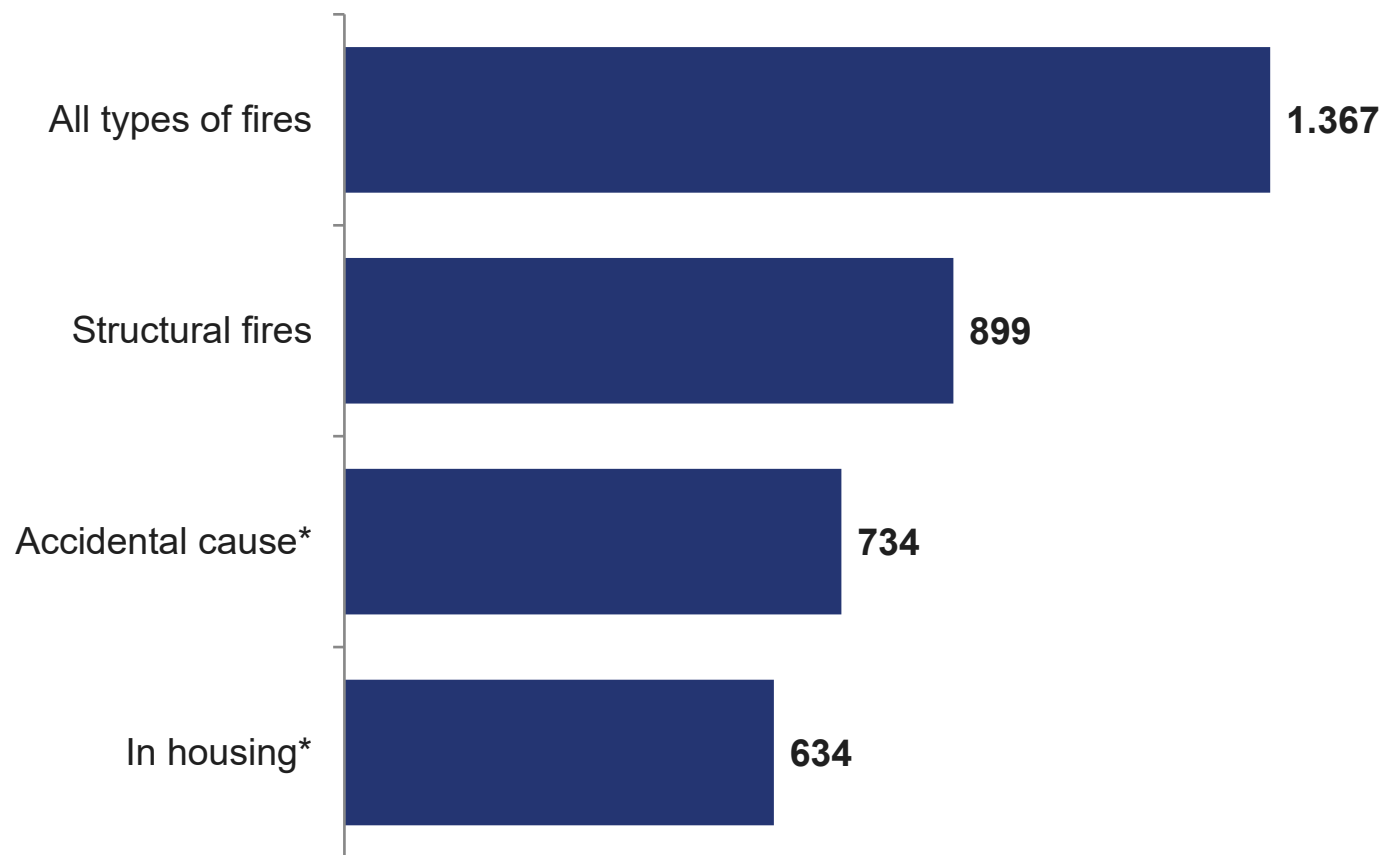
Businesses



Continuity of
operations

Paper does not put out fires: the technical certificate is the evidence of a verification, not its purpose.

Bogotá, 2025: one structural fire every 10 hours



2.5

structural fires per day

70.5%

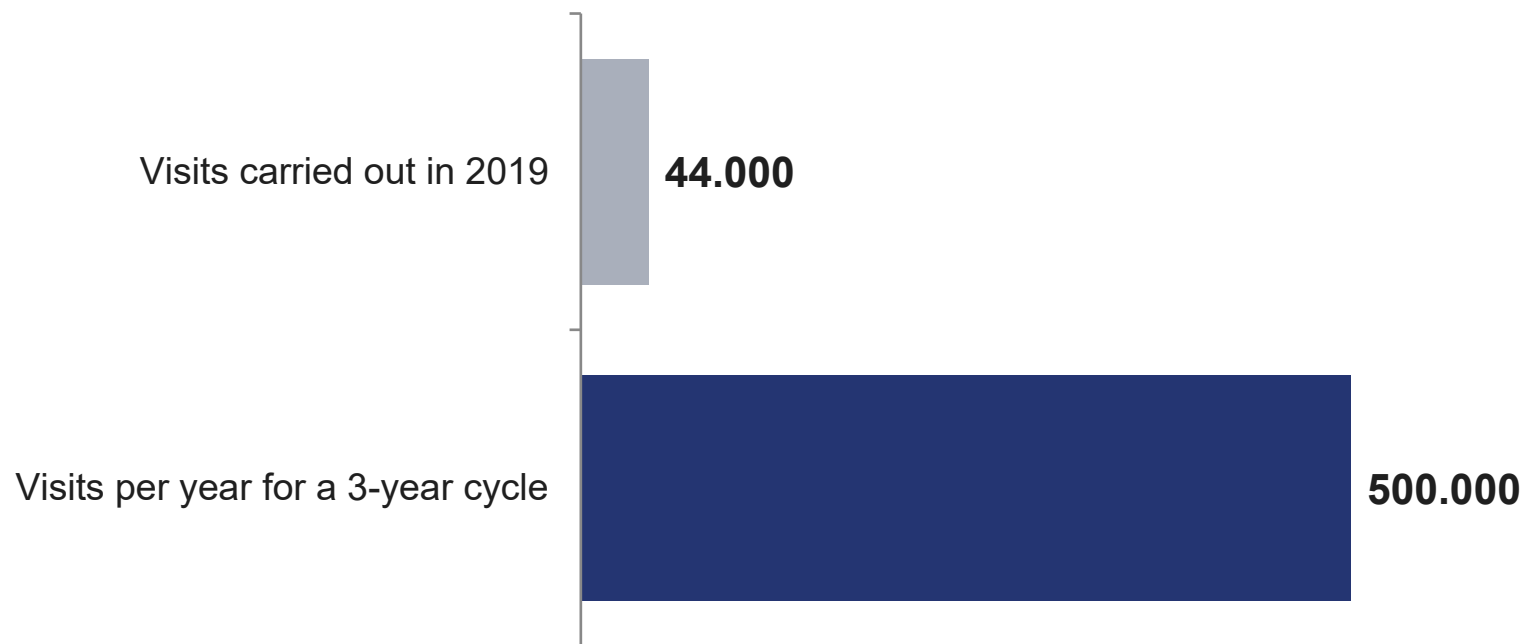
occur in housing

81.7%

are accidental: mostly preventable

* ANRACI estimate using the 2014–2021 distribution (81.7% accidental, 70.5% housing). Source: ANRACI, White Paper on Fire Protection (2026), with data from the Bogotá Official Fire Department.

The gap: inspection capacity falls short



+11x

the 2019 capacity needed to cover about 1.5 million buildings and establishments

The answer to the shortage of inspectors cannot be for each interested party to inspect itself.

Source: UAECOB (2020); ANRACI calculation: $1,500,000 \div 3 \text{ years} = 500,000 \text{ visits per year}$.

Why inspection is not a mere formality

A documentary procedure

- Verifies documents, data and payments
- Administrative knowledge
- If eliminated, the burden falls and the risk is low
- The risk is borne by the applicant

The safety inspection

- Verifies actual physical conditions
- Requires engineering and certified competencies
- If eliminated, unsafe conditions go undetected
- The risk is borne by third parties: customers, neighbors, firefighters



Roadworthiness inspection

No one certifies their own brakes.



Gas inspection every 5 years

Performed by an ONAC-accredited body.



Safety inspection

It must have the same rigor.

Simplify the procedure, yes. Eliminate verification, no.

The legal basis already exists



Ruling C-131 of 2004

The Constitutional Court concluded that good faith is not absolute and that requiring roadworthiness inspection of private vehicles is reasonable because it protects the general interest and reduces accidents. The same reasoning applies to a building.



Constitution

Arts. 2 and 11: protection of life. Art. 333: economic freedom is limited by the common good.



Law 1575 of 2012

Art. 42: fire departments are the competent bodies for life safety inspections.



Law 1523 of 2012

Shared responsibility and self-preservation: whoever creates the risk must manage it.



Law 1801 of 2016

Art. 87: safety conditions must be met throughout the economic activity.

What happens when verification fails



242 deaths

Kiss Nightclub, Brazil, 2013

The fire department permit had expired five months earlier and the occupant load had been exceeded.



72 deaths

Grenfell Tower, London, 2017

Risk self-assessment model; assessor lacked the required competence.



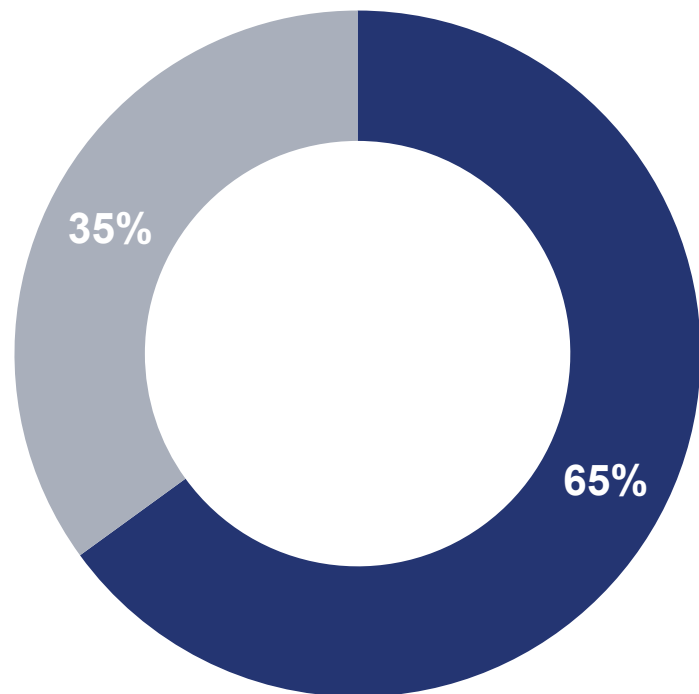
168 deaths

Wang Fuk Court, Hong Kong, 2025

Almost all safety systems failed due to human factors; alarms were disabled.

Sources: *Tribuna de Minas* (2025); *Grenfell Tower Inquiry, Phase 2 Report* (2024); *AP* (2026), *Wang Fuk Court independent committee of inquiry*.

Having systems does not mean they work



■ System shut off before the fire ■ Other reasons

When sprinklers do not operate, in 65% of cases it is because the system had been shut off before the fire.



The typical failure is human and maintenance-related, not a design failure.



A photo proves that a system exists, not that it works.



Only verified inspection, testing and maintenance can detect it.

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

The interested party is not a good inspector



Lacks technical competence

Fire protection is engineering: occupant load, exits, extinguishing agents, network pressure, pumps, detection, electrical installations.



Has an interest in the outcome

Wants to open, operate and generate income. It is not bad faith: it is incentives.



Has an interest in keeping costs down

The United Kingdom called it a "race to the bottom" (Hackitt, 2018).

Good faith protects intention; it does not make up for technical knowledge. Technical knowledge cannot be delegated.

The ICC: the technical basis Bogotá needs



A family of coordinated model codes, updated every three years through a public process, available in Spanish and being adopted in Colombia (IFC as an NTC by ICONTEC).

IFC

International Fire Code

New and existing buildings: operation, maintenance and inspection.

IEBC

International Existing Building Code

Alterations and changes of use; evaluation with 20 safety parameters.

IPMC

International Property Maintenance Code

The owner must provide and maintain fire safety.

IBC

International Building Code

Design and construction; basis of the future NSR.

Source: ICC, 2024 Spanish editions of the IFC, IEBC and IPMC (codes.iccsafe.org). The logo is a trademark of the International Code Council.

What the IFC has already solved for existing buildings



IFC 102.2 and Chapter 11

It applies to existing conditions and sets minimums for buildings constructed before the code.



IFC 109.2

The authority inspects and may approve reports from approved agencies, certified by their responsible officer.



IFC 105.5

More than 50 special-risk activities require an operational permit: risk is controlled by activity.



IFC 110 and 901.6

Systems operative at all times; continuous maintenance and records kept for 3 years.



IFC 901.7

A system out of service is reported immediately; the authority may require evacuation or a fire watch.

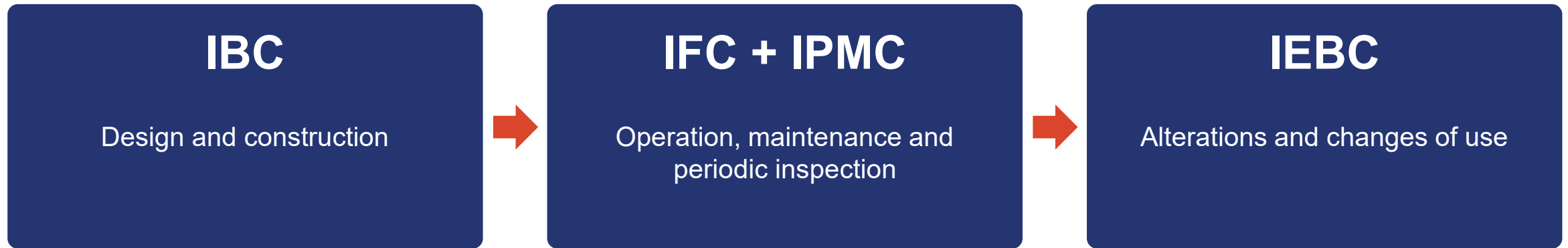


IFC Chapter 4

Emergency plans, drills and annual staff training.

Expanded with competent third parties; the authority retains control and no one certifies themselves.

An opportunity for the city



ICC codes cover the entire life of a building



ANRACI places its agreements with the ICC at the city's service



Inspector training and certification (Fire Inspector I and II)



Technical assistance to adopt and apply the codes



Bogotá can get ahead of the national IFC adoption process

Good practices: inspection is graded by risk

Jurisdiction	Who verifies	Frequency
United States (NFPA 1730)	Fire Marshal; certified companies report maintenance	Annual, 2 or 3 years by risk
Singapore	Professional engineer + authority (SCDF)	1 to 3 years
Hong Kong	Registered inspector	Every 10 years (buildings aged 30+)
Peru (ITSE)	Municipality, also after the sworn declaration	2 years
Mexico City	Accredited third party with insurance	According to internal program
Colombia: gas	ONAC-accredited body	5 years
Bogotá: DA 874	The interested party itself (low and moderate risk)	Not defined



OECD (2014)

Evidence-based inspections, proportional to risk and carried out by professional inspectors: "less in quantity, not necessarily in quality".

Sources: NFPA 1730; SCDF; Hong Kong Buildings Department; SD 002-2018-PCM; Mexico City Comprehensive Risk Management Law; CREG Res. 059 of 2012; OECD (2014).

Mass coverage, yes, but with competence



CORE OF THE MODEL

Accredited third parties

As with gas: certified technicians in ONAC-accredited bodies, under Fire Department control. Requires legal reform.



COMPLEMENT

Remote verification with technology

Real-time video inspection conducted by an inspector, supported by tools such as artificial intelligence (NFPA 915, ICC practices).



NOT VIABLE ALONE

More public staff

Covering everything with in-house staff would require more than 11 times the current capacity.



There is funding for it. The fire surcharge (Agreement 927 of 2024, 1% of ICA tax) had collected about COP 30 billion by July 2026, and the certificate is now free of charge for users.

No risk level is left without technical verification

SPECIAL

Specialized teams throughout the city

Chemicals, paints, flammables, lithium batteries, health care, crowds

HIGH

On-site visit + maintenance reports

Every year

MODERATE

On-site technical visit

Every 2 years

LOW

Real-time remote verification by an inspector + random visits (10%)

Every 3 years

No self-review: technical verification is never replaced by the interested party's declaration.

Shared responsibility: risk belongs to whoever creates it



Day by day the car brakes less. It is not maintained. One day the crash happens.

It was not an accident: it was foreseeable and could have been avoided.



Maintain systems in operation according to standards (NFPA 10, 25, 72).



Record inspection, testing and maintenance, available to the authority.



Prepare emergency plans, drills and training.



Correct findings within the set deadlines.



Be accountable for non-compliance (Law 1801 of 2016).

Law 1523 of 2012, arts. 2 and 3 (num. 4, principle of self-preservation). Shared responsibility does not relieve the State of its duty to verify.

Amendment to the articles: short and viable for the Council

1

Purpose

Results-oriented: life, property and the continuity of activities.

2

Responsible entity

The Fire Department will define procedures based on recognized technical standards.

3

Guidelines

Mass coverage with technical criteria, risk-based approach, shared responsibility, virtualization and training.

4

Technical certificate

Always subject to prior verification by competent personnel: on-site for moderate and high risk, real-time remote for low risk. 10% random visits.

5

Follow-up

Annual report to the Council on coverage, verifications and the trend in fires.

6

Entry into force

Upon publication; 24 months to implement remote verification.

List of amendments to the text approved in first debate: keeps the title and structure and adds a follow-up article. Requires legal review before submission.

Beyond the Agreement: ANRACI's proposed agenda



Periodic electrical inspection

As with gas, by accredited bodies under RETIE; an unsafe result leads to disconnection of the service.



Condominium buildings

Periodic inspection of common areas and systems, with the property manager responsible.



Accredited third parties

Legal authorization for ONAC-accredited inspection bodies.



The ICC as a reference

Fire Department inspection manual based on the IFC and the IEBC; cooperation agreement.



Information and data

A platform that classifies risk, prioritizes inspections and measures results.



Funding

Fire surcharge to fund competent inspection and the technology platform.



May no Colombian have to mourn the loss of a life, property or livelihood because of a preventable fire.

ANRACI places at the disposal of the Bogotá City Council, the Fire Department and the District Administration its technical knowledge and its agreements with the ICC to build a modern, agile and digital verification model.



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