



**EFSAC**

European Fire and  
Security Advisory Council

**Secretariat**

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Mr Vicente Leoz Argüelles  
Head of Unit  
DG Enterprise  
European Commission  
200 rue de la Loi  
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Brussels, 11 March 2004

Dear Mr Leoz

EFSAC, the European Fire and Security Advisory Council, is the umbrella organisation of the European associations active in the field of fire protection and intrusion protection.

Among EFSAC members, we count the following associations representing manufacturers producing fire protection components and systems:

- Euralarm, the European Association of Manufacturers of Fire and Intruder Alarm Systems, which represents approximately 700 companies having a total turnover of about 3.5 billion euro covering 70% of the total European market
- Eurofeu, the European Committee of the Manufacturers of Fire Protection Equipment and Fire Fighting Vehicles, which represents companies from 11 countries with a turnover of approximately 4.5 billion euro.

Another member of EFSAC also engaged, from another perspective, in the field of fire protection is CEA, the European Trade Association of Insurers, which represents 31 national insurance associations.

As an association representing a large number of European manufacturers and installers of fire and security components and systems, insurers, end-users and technical bodies, EFSAC is concerned about the latest developments with EN 12845 dealing with sprinkler systems.

We believe these developments are a cause of concern not only for those directly affected - the sprinkler industry - but also for those who might be affected in an indirect manner - the whole sector of fire protection and security systems.

These developments might be summarised as follows:

1. EN 12845 was essentially changed AFTER the Formal Vote (deadline 15.10.2002) through a modification of the definition of the "kit". Other modifications, which were assessed as TECHNICAL, were also introduced. We hereby underline that CEN did not respect the agreed procedures in this matter.
2. Design rules for sprinkler systems are treated in a different manner to those for other similar systems.

Non-mandated systems include the following:

- EN 54-13 - Fire detection and fire alarm system requirements
- EN 54-14 - Guidelines for planning, design, installation, commissioning etc.
- EN 12416-2 – Powder systems - Design, construction and maintenance (pending TC 191 resolution to request withdrawal from the mandate)
- EN 13565-2 – Foam systems – Design, construction and maintenance (pending TC 191 resolution to request withdrawal from the mandate)
- EN 12101- 4/5/6 – Heat and smoke venting systems
- EN 12094 - Gas extinguishing systems

Moreover, unlike standards for other systems, the mandated part of EN 12845 is not restricted to the specification of a product, but covers the whole system, including its design.

**In the other standards mentioned above, the system design was deliberately excluded from the mandate.**

This was done taking into account that

- the fire protection industry is either selling components or systems, but not kits
- today there are no barriers to the trade of these systems
- the design of a system for an individual building is unique in every case
- deviations from the existing design rules are necessary in practically every system
- building codes and safety levels in the member states are different; this results in deviating requirements for fire protection systems
- the existing standardisation procedures are too slow to keep up with the constant change in real life.

Consequently the rules for design, calculation and installation of all systems mentioned above are not treated as harmonised standards.

Therefore keeping the “plan, design, installation and maintenance” rules for sprinkler systems in the mandate would have tremendous negative impact on the European fire protection trade and on the quality of fire protection systems.

Indeed, this situation would hinder improving the environment for the competitiveness of the construction and construction products industries.

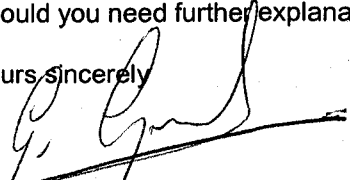
Furthermore, these measures are, we believe, incoherent and unattainable in practice.

As it cannot be in the interest of the European Commission either to put an unnecessary burden on our specific sector or to restrict safety in case of fire, we would appreciate your help in order to solve the aforementioned problems.

**Consequently, we ask you to advise CEN to apply the same principles to all fire protection systems.**

Should you need further explanation or want to meet us, please do not hesitate to contact us.

Yours sincerely



Bert van Langeveld  
President, EFSAC

cc Giancarlo Bedotti, DG Enterprise, European Commission