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**HOTREC¹ comments on the issue of fire safety and
the update of the Technical Guidelines annexed to Recommendation
86/666/EEC**

May 2006

In view of the assessment of the application of the Council Recommendation 86/666/EEC on fire safety measures in hotels and the recent discussions on a revision of the technical guidelines annexed to this document by the EU Commission, HOTREC and its member associations would like to briefly comment on the issue.

Firstly, HOTREC would like to stress the need to differentiate between accidents that occur in hotels or similar establishments and accidents that occur in other types of tourism accommodation. We therefore welcome the idea presented by the Commission to initiate a pilot project on hotel fire statistics as well as a review of existing data collection systems, as it will demonstrate that hotels are very safe.

The most prominent cases of hotel fires that occurred in the recent past (especially in France) cannot be considered as representative examples for the general fire safety situation in hotels: The hotel fires mentioned above happened in hotels that were requisitioned by the local French authorities to house asylum seekers. This is mainly done with low category hotels, which are, in addition, usually exceeding their normal room capacity by 2 to 3 times.

¹ HOTREC represents the hotel, restaurant and café sector at European level. This sector counts 1.4 million businesses and provides 7.5 million jobs in the EU alone. HOTREC brings together 38 National Trade and Employer Associations representing the interest of the sector in 23 different European countries.

More generally, in this matter as in many other areas of interest to the hospitality sector, HOTREC calls for the principle of subsidiarity to be fully respected. HOTREC is convinced that – as stated in a report published by the Commission in 2001 on the application of the 1986 Recommendation – a recommendation remains the most appropriate legal instrument in this area.

Detailed comments by our member associations are attached.

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