

DISCUSSION PAPER

Enhancing fire and life safety and creating awareness about domestic life safety



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ANEC is supported financially by the European Union & EFTA



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Ref: ANEC-SERV-2024-G-048

22/11/2024



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1. INTRODUCTION

ANEC has contributed to policy initiatives on fire safety and on the prevention of carbon monoxide (CO) poisoning for numerous years. Our contribution to the European debates started with discussion on the possible revision of Council Recommendation 86/666/EEC on fire safety in existing hotels. Our activities have evolved since, alongside increased collaboration with the European Fire Safety Alliance, to call for a consistent European Fire Safety Strategy across all Member States that would focus on existing and emerging risk in all buildings. Throughout our activities, we have aimed at ensuring the needs of vulnerable persons are recognised and known when it comes to accessing buildings, understanding what to do in an emergency and making plans for evacuation and escape.

Below is a brief overview of our main advocacy activities over the years in the areas of fire safety and CO safety.

• Hotel fire safety

One of the priorities of ANEC has been to obtain European legislation on hotel fire safety that would rely on harmonised technical standards, while providing guidance to all types of hotel in prevention of fires and in safety management. Hotel (fire) safety is an issue which many consumers take for granted when travelling, expecting a similar degree of safety from one country to another. This is not always the case as studies have shown. In particular, the evacuation of vulnerable guests (e.g. persons with disabilities) from hotels is not guaranteed everywhere. We welcomed that the EC was considering revision of Council Recommendation 86/666/EEC on fire safety in existing hotels and joined the discussions with stakeholders.

We have sought legislation to cover **emergency planning, fire safety management, staff training and awareness, including disability awareness**, i.e. issues that can be addressed in new and old hotels, irrespective of size. The measures that would result from such legislation are probably already in place in hotels that are genuinely safe.

Unfortunately, there has been no political will in the EU executive for further European action in the area since2014.

• Improved fire safety information in Europe

ANEC continues collaborating with other stakeholders campaigning for the setting up of a **pan-European accident & injury database** as a first and minimal step in the area of fire and life safety.

ANEC participates in the **European Fire Information Exchange Platform (FIEP)**, which we consider a crucial forum to aid fire safety at the European level. FIEP and the European Parliament have identified a need and opportunity to explore the potential for more coordinated and harmonised fire safety data and statistics at the European level. To this aim, the European Parliament has initiated a Pilot Project called '<u>EUFireStat</u>' and has mandated the EC to manage it. ANEC participated in the **FireStat Project** Steering



Group (SG) and finds the final project report of EUFireStat¹ of great interest, noting the context of ANEC-EuroSafe position paper "European consumer safety needs solid injury data" (<u>https://bit.ly/352G2gQ</u>) and its supporting infographic (<u>https://bit.ly/3eIA3RL</u>).

• EU Fire Safety Strategy

Ahead of the 2024 European elections, ANEC joined fire experts and industries working on fire safety in the European Union in the launch of a campaign calling for an EU Fire Safety Strategy.

Members of the European Parliament, candidates for election to the Parliament in 2024, and economic and societal stakeholders, were invited to endorse the <u>manifesto 'Keeping</u> <u>EU citizens fire safe in all buildings'</u>. The Manifesto calls on the European institutions to prioritise fire safety in buildings, and develop and promote a consistent strategy within Member States for the fire safety of people in buildings. This call recognises unmitigated risks that exist at present, and the need to address new challenges that may result from innovations introduced for the decarbonisation of buildings. For more information on the campaign and to give support, please visit <u>https://www.keepeufiresafe.org/</u>.

This campaign came at a crucial time when nearly 450 million EU citizens, who spend on average 90% of their time in buildings, elected their representatives to the EP.

• Prevention of carbon monoxide (CO) poisoning

Carbon monoxide is a colourless, odourless and poisonous gas. When carbon-based fuels do not burn properly, excess CO is produced. When CO enters the body, it prevents the blood from taking oxygen to cells, tissues, and organs. Although no accurate data are available, there are numerous fatalities in the EU annually due to CO poisoning.

For many years, ANEC has advocated European action on prevention of CO poisoning. We especially collaborated with Consumer Safety International (CSI) to raise awareness among EU institutions and the public.

In addition to policy initiatives, standards are also important tools in the prevention of fires and CO poisoning. Hence ANEC looks to ensure standards for everyday consumer products take these aspects into account.

Aim of this paper

In our advocacy work, we increasingly observe the key role played by raising awareness of domestic life safety.

Being an umbrella organisation established at the European level, it is not the role of ANEC to speak directly to consumers. Nevertheless, we work through our members who are able to promote our common positions at the national level.

With this paper, we aim to raise awareness further on initiatives that can be taken by ANEC members and other Civil Society Organisations, as well as European, national and local institutions and authorities.

¹ https://cloud.efectisfrance.fr/index.php/s/PLftkTHyrra78Hc



2. Why do consumers often think that fire safety is not their responsibility?

There are a few reasons why consumers may think fire safety is not their responsibility:

- Misplaced Trust Some people assume someone else, such as a landlord in an apartment building or the employer at a workplace, is solely responsible for fire safety. While they do have significant responsibility, fire safety is a shared effort. Some consumers may assume they are protected by law and can seek damages for injury or other harm, not knowing they too have a role in ensuring fire safety.
- Lack of Awareness People may not be aware of fire risks in their environment, or underestimate how quickly a fire can spread. This can lead to a false sense of security and a downplaying of fire-safety measures. Most residents do not fully understand building or fire regulations, nor who is responsible for what. More could be done to educate people, not just on their responsibilities, but their rights, how to assert them and making sure others do what they should.
- Inconvenience Factors Taking precautions such as routinely checking the function of smoke detectors or having an escape plan - can feel an annoyance. People might prioritise convenience over potential danger. Cost is also a factor: many people, particularly those financially vulnerable, may make decisions based on cost rather than safety.

It is important to remember that fire safety is everyone's responsibility. By taking some simple steps, we can all help prevent fires and keep ourselves and others safe.



3. The perspectives of ANEC members on fire safety awareness at national level

In support of the joint call for a European Fire Safety Strategy and our objective to add to the prevention of accidents involving fire, we have started addressing what actions can be taken to raise awareness.

Before the 2024 summer break, ANEC consulted its members on their experiences at national level on the following aspects:

- I. Perception of how fire safety is addressed at national level
- II. Awareness of who is responsible for fire safety
- III. Existence of community-based fire safety programmes
- IV. Consumer problems identified
- V. Use of electrical safety checklists (such as FEEDS initiatives) for consumers

Ten responses were collected from seven countries of the ANEC membership: Denmark, France, Germany, Malta, Portugal, Spain and the United Kingdom.

Below is a summary of the findings from the survey as regards the questions posed.

<u>I. How do you feel that the issues surrounding fire safety are being</u> <u>addressed in your country?</u>

General Concern on Awareness:

Fire safety is inadequately addressed, with insufficient awareness-building and training among the public. Many people, at work and in private life, do not know how to respond to fire emergencies.

Mixed Responses:

Some believe that fire safety regulations are followed well (Germany, United Kingdom), while others (Spain, Malta) feel there are significant gaps, such as outdated regulations and lack of a comprehensive national strategy.

Specific Issues:

In Spain, there is concern about the lack of mandatory fire protection systems in older buildings and increasing fire-related deaths. France and Portugal note public safety measures but see room for improvement in private and residential sectors.



II. Who do you think is responsible for fire safety?

Shared Responsibility:

Most respondents believe fire safety is a shared responsibility between the government, business and individuals. But there are differing opinions on primary responsibility.

Government Role:

The government is seen as responsible for creating and enforcing fire safety laws (Germany, France, Malta), while business and individuals are expected to comply with, and implement, these regulations (UK, Spain, Portugal).

Need for Training:

There is a consensus that more training and public awareness are needed, with some pointing out that untrained individuals are often tasked with fire safety responsibilities.

III. Are you aware of any community-based fire safety programmes in your country?

Limited Awareness:

Most respondents are unaware of any community-based fire safety programmes in their countries, indicating a possible lack of such initiatives.

Exceptions:

The United Kingdom reports that home checks for vulnerable people are offered by the local fire brigade, while Spain mentions occasional firefighter-led awareness campaigns. In Germany, community-based efforts are typically linked to fire departments.

IV. What problems do you see from the consumer point of view?

Lack of Awareness and Training:

A significant issue is the lack of consumer awareness and training regarding fire safety, with many people unaware of possible fire hazards and preventive measures (Germany, Portugal, Malta).

Regulatory Gaps:

Some respondents highlight deficiencies in regulations, such as absence of mandatory smoke detectors in Spain, and missing smoke alarms in older homes in Denmark.

Consumer Inability to Assess Fire Safety:

Consumers often cannot verify the quality or presence of fire safety measures in public places or products, necessitating external controls and stricter enforcement (Spain).



Technology and Education:

There is a call for better integration of fire safety education into school curricula, and the use of technology (e.g. QR codes) to inform the public about fire safety measures.

V. Awareness of FEEDS Electrical Safety Checklists

FEEDS - the Forum for European Electrical Domestic Safety – has published electrical safety checklists focusing on key actions that can be taken to prevent fires with electrical sources, especially in the deployment of high-load or electrical production installations in the domestic sector.

FEEDS informed ANEC about these: <u>https://tinyurl.com/2dr4mt6y</u>. Our members were asked whether they find the checklists useful tools to increase consumer awareness.

Positive Reception:

Most respondents appreciate the checklists, with some expressing intentions to promote them at the national level.

Risk of Complexity:

Some respondents feel the checklists are too technical for the typical consumer, which may limit their effectiveness. There is also a wish for translation into other languages².

Need for Training:

Several respondents emphasise the need for complementary training to help consumers better understand and implement the safety measures suggested in the checklists.

 $^{^2}$ We welcomed the announcement at Fire Safety Week 2024 that the Checklist will be translated in Polish as a first step.



4. Importance of harmonised data collection

The collection of consistent and accurate data will help to inform decision-makers about the nature/causes of (fire-related) incidents, so that they be proactive in mitigating the risks to consumers.

It is key to follow-up the successful <u>EUFireStat project</u> and extend it beyond fire safety to a pan European accident & injuries database.

As a first step at European level, it is essential for the European Commission to set up a **European accident & injuries database**³ that also addresses fire accidents, with the data collected and shared in a consistent manner. Reliable and up-to-date data are of huge importance to many stakeholders, including governments, business, standards developers, enforcement authorities, prevention agencies and the general public. Data collected will be extremely valuable to decision-makers. Consumer protection, fire and safety agencies should be consulted on the types of data to be collected.

As stressed in the <u>Fire Safety Manifesto</u>, we agree with other stakeholders on the need to standardise and consolidate EU fire statistics, ensuring reliability and comparability, and drawing insights from the EUFireStat pilot project.

ANEC welcomed the creation of the European Fire Information Exchange Platform as it allows for exchange of good practices and helps keep the attention of decision-makers on fire safety.

We agree with stakeholders involved in the European Fire Safety Alliance and the cosignatories of the Fire Safety Manifesto to push for a common framework allowing better exchange of information.

We see this as the only way forward, noting that the <u>Modern Alliance EU Fire Safety</u> <u>Guide</u> (on which ANEC commented) and <u>European Fire Safety Action Plan: 10 actions</u> <u>to improve fire safety across the EU</u> have been excellent starting points.

³ ANEC-Eurosafe common <u>position paper</u>, "European consumer safety needs solid injury data", <u>infographic</u> and <u>press release</u>, November 2020 Joint call "<u>The need for a pan-European accident and injury data</u> <u>system</u>", March 2013



5. Recommendations for stakeholders to increase fire safety awareness

The involvement of consumers and the general public in fire safety initiatives throughout the EU could significantly enhance the efforts at prevention and reduce the incidence of casualties and injuries. We hope we can encourage people to take a more active interest in protecting themselves and their loved ones.

We have gathered tips on how to encourage interest in fire safety for ANEC members and stakeholders, such as the EU institutions; national and regional authorities and public services; other consumer organisations and other civil society organisations.

Some approaches stakeholders could take in this direction include:

A. Public Awareness Campaigns

To raise public awareness on fire safety, it is crucial to tailor campaigns to resonate with **diverse demographics**. This involves considering cultural and socioeconomic factors.

Educational campaigns should **consider examples of groups with wide impact.** For example, **providers of social housing**. The inclusion of **youth groups** (e.g. scouts) should be considered as they have worldwide reach and can create fun ways for children and younger people to learn fire safety.

Clear and concise communication is key. It is important to avoid technical jargon and use various platforms, such as social media, television, radio, and print media to reach the widest audience possible. **Collaborating with local organizations** and community leaders can help target specific communities and address unique needs.

Provide accessible online resources, including fire safety tips, information on emergency preparedness, and the local regulations. Develop apps that give fire safety information, emergency contacts and location-based alerts.

Accessibility requirements, such as sign language, Braille, audio description etc. should be considered when creating information to ensure information and campaigns are accessible to all. It is also vital not to exclude those without access to the internet or to mobile apps.

B. Educational Programmes

As highlighted by ANEC members when responding to the survey, there is a critical need for **fire prevention training** among consumers who often lack adequate knowledge on home fire prevention and emergency response. Designing training programmes with **media outreach** and public funding support for consumer organisations can bridge this gap.

Schools and universities should integrate **fire safety education** into their curricula at all levels, starting at an early age. **Resources such as** <u>StayWise</u> in the UK or the



<u>BfireSafe@School</u>⁴ Programme funded by Erasmus+ and available in 10 languages are a good example of what already exists and can be promoted and built upon.

Moreover, mandatory **fire safety training for employees** should be provided in the workplace, and workshops at the community level held for residents to learn about fire prevention and escape planning.

It must be ensured that community workshops examine the different needs for escape planning. Some people, such as those with visual or cognitive impairment or limited mobility, are particularly **vulnerable**. Their **specific needs** should be considered at all relevant stages of planning, but this is not common practice at the moment.

C. Consumer Involvement in Product Safety

Consumer participation in product safety is essential to enhance fire safety and protect public welfare. This includes promoting clear and informative **labelling** that provides crucial fire safety information, enabling consumers to make well-informed decisions. Additionally, independent **testing** should be encouraged to ensure products comply with established fire safety **standards**. Establishing mechanisms for **consumers to report** defective products or safety concerns is also critical, creating a proactive system to identify and address potential risks effectively.

D. Community Fire Safety Planning

Community fire safety planning is a vital aspect of preventing and responding to fire hazards effectively. Local initiatives, such as **home checks** and fire drills organised by local brigades, play a key role in fostering awareness and preparedness at community level. Households and businesses need to be encouraged by the legislators to develop comprehensive emergency plans, including clear escape routes and evacuation procedures, to ensure readiness in case of an incident. **Personal Emergency Evacuation Plans** (PEEPs) are crucial for individuals with disabilities or mobility impairments.⁵

Educational materials, such as the **electrical safety checklists developed by FEEDS**, focus on actions to prevent fires with electrical sources and should be promoted widely (<u>https://tinyurl.com/2dr4mt6y</u>).

Similarly, the **Spanish Consumer Association CECU** reported to ANEC that they have already created informational resources on the fire risks associated with non-compliant electronic devices and textile products. These materials, including videos on various fire hazards, are accessible online⁶ and serve as excellent examples of raising awareness.

https://www.housing-executive.co.uk/issue15/index.html Page 36

⁶ <u>https://cecu.es/wp-content/uploads/2022/09/pildora_mix1.mp4</u>

⁴ This is a teacher led fire safety education resource for post primary students <u>https://www.bfiresafeatschool.eu/index.html</u>

⁵ This article and case study explains the use of PEEPS in UK



By learning from such **good practices**, other Civil Society Organisations and authorities can adopt proactive measures to enhance safety and reduce risks in residential settings.

E. Government Engagement

Governments are seen as the primary responsible for **creating and enforcing laws**, as reported also in our internal survey.

Governments and local authorities can provide **financial help to citizens in vulnerable situations** in taking preventive actions. They can also provide financial programmes for public **training** and creating **prevention strategies**. They can start **public consultations** to seek views and opinions from consumers and general public on fire safety policies and regulations.

The European Commission can also aid **collaboration** between governments, industry, and consumer organisations.

By actively engaging consumers and the public in fire safety matters, Member States and the EU institutions can create a more informed and empowered population that is better equipped to prevent and respond to fires.

How to make these messages come across

Personalising fire safety, making it more interesting, easier, and more accessible should stimulate people to take greater interest in the protection of themselves and their loved ones.

Make it relevant and relatable

- **Focus on personal impact**: Frame fire safety as vital in protecting loved ones and pets, not just property. Highlight real-life stories about fires and the impact they had, adding information on available statistics such as on the frequency of fires.
- **Connect to hobbies**: Tailor fire safety information to hobbies or activities. For example, target camping enthusiasts with campfire safety tips or highlight electrical safety for DIYers.

https://cecu.es/wp-content/uploads/2022/09/pildora_telas1b.mp4 https://cecu.es/wp-content/uploads/2022/09/pildora_electric1b_2.mp4



Make it attractive

- **Interactive activities**: Conduct fire safety drills, make competitions for escape plans, or virtual reality experiences to embed learning actively.
- **Gamification**: Use games or quizzes to test fire safety knowledge and make practising fire drills more fun.
- **Social media campaigns**: Utilise short, informative videos, interactive polls, or influencer partnerships to spread fire safety awareness.
- **Provide resources**: Offer downloadable checklists for fire safety inspections, online tutorials on extinguisher use, or mobile apps with escape plan templates.
- **Partner with business**: Encourage local businesses to offer fire safety information alongside relevant products (e.g. hardware stores with fire extinguisher guides).



6. What role for standardisation

While information, as described above, is crucial in raising awareness of the public and relevant stakeholders about fire safety, standardisation has an important role to play in ensuring passive safety of the built environment.

Harmonised technical standards are important in fire safety as long as they take into account the different standards required in Member States due to differences in building materials and methods. Harmonized guidance for home electrical installations checks, for instance, would be useful to raise fire safety awareness, as it already exists in some countries for gas installations in housing.

Moreover, it is important standardisation does not focus only on fire safety of buildings, but also on making consumer products and appliances safer in avoiding fires.

• Fire safety

ANEC participated in CEN/CLC/JTC 4 "Services for fire safety and security systems" in development of EN 16763:2017 'Services for fire safety systems and security systems'.

We welcomed the change this standard brought as before there was a large difference between the requirements for fire safety and those for security systems. This had an adverse effect and cost implications for the consumer. There was also a large difference in the installation and service standards among countries in the EU. This standard has now removed much confusion and misunderstanding that existed previously.

• Child resistant cigarette lighters

In the past, many fires were attributed to children under five years of age playing with cigarette lighters that were not fitted with childproof devices.



ANEC was instrumental in drafting the standard that ensures child-resistant mechanisms on lighters are fitted to prevent such accidents, EN 13869 'Lighters – Child resistance for lighters – Safety requirements and test methods'. Following our work and campaigning, the European Commission and Member States decided in 2008 to ban the sale of most types of lighters that did not comply with this standard.

• Flammability of Toys

ANEC participates in the work of CEN TC 52 WG13 which is developing an amendment to EN 71-2 'Safety of toys – Part 2: Flammability'. The amendment focusses specifically on fire safety of soft filled toys, toy disguise costumes and toys intended to be worn by a child in play (also on the head, e.g. face masks). The rate of spread of flame on the



surface of the toy is an important factor. We are satisfied with the development of this amendment.

• Fire safety of Household appliances

Following serious accidents and fatalities (e.g. Grenfell Tower in the UK) due to fires caused by faulty electrical household appliances, we welcomed the determination of IEC/TC 61 to create robust fire prevention requirements for household appliances.

ANEC, under the umbrella of Consumers International, participates in IEC TC 61 AG 4 which deals with surface temperature limits of household appliances, and resistance to heat and fire.

• Barbecues

Many consumers are unaware that indoor use of a charcoal barbecue grill for heating or cooking creates an accumulation of carbon monoxide that can lead to fatal accidents.

In 2016, ANEC therefore pressed CEN/TC 281 to develop an amendment to EN 1860-1/A1 'Appliances, solid fuels and firelighters for barbecuing – Part 1: Barbecues burning solid fuels - Requirements & test methods', introducing a pictogram to warn consumers that the barbecue should not be used indoors.



ANEC welcomed the adoption of the amendment in 2017. The amendment introduces a safety symbol to appear on barbecues in order to warn consumers not to use barbecues indoors because of the risk of CO accumulation and poisoning.

• CO Detectors

We were less successful during the revision of the standards for CO alarms: our main concern is that the CO activation levels in EN 50291-1 and EN 50291-2 are far too high and above the human safe levels of exposure as recommended by the World Health Organisation. In 2018 and 2019, we disagreed with the adoption of the standards mainly for this reason. Moreover, the standards do not sufficiently protect consumers against CO poisoning in relation to instructions and warnings: in case the alarm goes off, the most important for a consumer is to know what to do. It therefore makes no sense:

- to include only a warning in the user instructions that the dwelling should be evacuated in case of an alarm. This is critical information which needs to be put on the apparatus too.
- to put the number of the European Standard on the detector. Having this information will not save lives in case of an emergency. It can easily be put in the instruction manual instead, leaving space for the critical information above.



We applaud the recent initiative of CENELEC TC 216 to look into the issue and to update the standards.

Our experience in this sector mainly relates to product safety standards as described above. It is important to underline that while unsafe products can be the cause of fires, it is buildings that are affected, and standards also need to address key issues of building design, behaviour, materials, construction and management to make sure risks are minimised and any incidents dealt with swiftly and effectively. These factors are also addressed extensively in national, European and International standardisation.

For fire safety standards to effectively address real risks faced by consumers, proactive efforts should be made by standardisers to engage with under-represented groups to understand their needs and experiences.



7. ANEC campaigns on CO safety

The following campaigns about CO safety are carried out systematically more than once a year and are intended to include younger people too:

`Be Safe This Summer'



During the summer holiday season, many consumers go camping and take their barbecue grills with them. But when it rains and they cannot cook outside, or when it is cold, some take their barbecue inside or indoors, either to heat the tent or caravan, or to cook. The indoor use of charcoal barbecue grills creates an accumulation of carbon monoxide that can lead to fatal accidents.

In order to raise awareness, ANEC and Consumer Safety International launched the leaflet, 'Be Safe This Summer', to help educate children and young adults on the dangers of carbon monoxide poisoning, and to warn that 'Misuse of a BBQ

grill can kill!'. The leaflet explains how carbon monoxide gas has no colour, taste or smell and strikes without warning. It also gives simple tips to recognise and prevent CO intoxication and gives guidance on what to do in case of a CO poisoning.

The leaflet is available in 10 different languages and can be found on the campaign page⁷, which details other ANEC activities related to the prevention of CO poisoning.

• Safe use of barbecues during wintertime: 'CO kills! Stay aware!'



As accidents involving carbon monoxide are more frequent in colder months, ANEC also returns to social media each year to remind consumers never to use a charcoal barbecue indoors because of the high risk of CO poisoning (<u>https://bit.ly/3ou0jp9</u>).

⁷ https://www.leanonus.co/bbq



8. Conclusion

Our survey among the national consumer organisations represented in our membership showed consumer organisations find fire safety is generally not adequately addressed. There are regulatory gaps in certain cases, and **insufficient awareness and training** is a more general problem. Many people are unaware of potential fire hazards and the preventive measures.

With this paper, we provide advice to institutions and civil society organisations, echoing the points highlighted in the EU **Fire Safety Manifesto for 2024-2029** that provides actionable pathways to implement a **European Fire Safety Strategy**, and ask the European institutions to develop it and promote it with Member States for the fire safety of all people who live and work in buildings.

It is key to include civil society from the start of strategy planning to protect citizens' rights and design actions targeted at vulnerable people and their living environments (urban and rural).

ANEC, and the other co-signatories to the Manifesto, call for a unified, comprehensive approach to fire safety across Europe, emphasising prevention and awareness, and seeking the harmonisation of fire safety standards.

A key prerequisite that Europe needs to succeed in the EU Fire Safety Strategy is to standardise and consolidate **EU fire statistics**, ensuring reliability and comparability, drawing insights from the EUFireStat pilot project. Ideally, this would form part of a **pan-European accidents & injuries database**.

We advocate improved fire prevention measures, including **fire safety education for citizens** and training for professionals, alongside the implementation of rigorous safety standards for building design and materials.

It is important to raise awareness about new risks from increased electrification of our dwellings, promoting FEEDS material and similar awareness-raising exercises. This can be extended to include the prevention of fires caused by lithium batteries in vehicles.

Last but far from least, in line with the EU Fire Safety Manifesto, we call for collaboration among stakeholders, including government agencies, the construction industry, and fire safety experts, to share best practices and develop standardised guidelines aimed at protecting the environment property and – above all - lives.



Acknowledgments

We would like to extend our special thanks to Alan Cox, Fire Safety Expert and ANEC representative, for his valuable contributions to this paper.



ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and the use of standards, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 34 countries.

ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels.



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C Register of Interest Representatives: lentification number 507800799-30

BCE 0457.696.181

ANEC is supported financially by the European Union & EFTA

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