



INDIAN MEDICAL ASSOCIATION

LUCKNOW BRANCH

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NOMINATED

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Ref. IMA Lko/Admini/Fire NOC/ 91 /2024

Dated. 25.04.2024

To

**Sri Deepak Kumar,
The Additional Chief Secretary (Home),
Govt of Uttar Pradesh.**

Sub : Relaxation of norms for obtaining Fire NOC/Fire safety Certificate of Small Healthcare Organisations (SHCOs)/ Establishments.

Respected Sir,

We thank the Govt of Uttar Pradesh which in pursuance of its policy of 'Ease of doing business' passed the GO(No 18/6-Pu-8-2022/905(34)/2016TC) dated Jan 07,2022 through which the Fire NOC for buildings less than 15 m and built by 30.06.2022 was made voluntary, and certain norms were decided for them if they still want to go ahead with a NOC.

However, the voluntary part of the NOC stands withdrawn after the Uttar Pradesh Fire & Emergency Service Rules,2024 have come into force. As of today, all such establishments also have to take a Fire NOC. To our knowledge, this will also be required for renewal of the registration of the establishment (less than 50 beds) by the Chief Medical Officer.

Sir, we wish to state that being a community involved with life saving, we are committed to follow norms helpful in safeguarding the lives of our patients, staff and ourselves.

However, many of the norms specified in the order are either impossible, or extremely difficult to execute. There are also some discrepancies in the norms for Nursing homes/Hospitals and other commercial categories. Even in our category (designated as C1) some requirements do not appear logical and practical.

To highlight a few major issues we are quoting the following:

1. Building underground water tanks : The Underground tank capacity for G+2 facility with beds starts at 50,000 litres which would amount to excavation an equal amount of soil first, which would weigh almost 75 tonnes. That would itself damage the foundation and cause tilting of the building and possibly damage the adjacent building too. Secondly, the water stored in

Cont.-2



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this volume is bound to leak through the walls of any concrete structure despite every precaution. This would lead to seepage and dampness spreading into the health facility as well as the neighboring buildings. In many cases, small establishments will not even have any land to build such a structure which would be something like 10ft x 10 ft x 18 ft deep structure.

2. Overhead tanks : The capacity for building overhead tanks starts at 20,000 litres equivalent to 20,000 Kgs load. Many buildings are small and old and may not have requisite building strength to sustain such a load.
3. Automatic sprinkler systems : With already built building, many with false ceilings, with patients admitted, it may be a herculean task to lay a sprinkler system and some other option like modular fire extinguishers may be a feasible option. Such a requirement has not been advised for other Institutional building like hotels/schools where it is made a norm only when there is a basement exceeding 200 sq m.
4. Civil requirements like width of stairs, having two exit gates, cannot be modified to norms as either such a structural change is impossible, or the establishments is too small to have two exit gates.

With respect to above we would like to request making the norms practicable for better safety against fire. Existing norms for Fire NOC may not be doable for SHCOs and lead to their closure. We would like to state here that the SHCOs provide for at least 70% of healthcare at affordable cost in the Private sector and have been pillar of strength for the Government in its successful battle against Covid 19. In addition, the SHCOs are a large provider of employment and many families are dependent on them for sustenance.

In view of above, we humbly request you to consider the following :

1. To make a committee of Fire and Healthcare officials, & members from the Indian Medical Association and Lucknow Nursing Home Owners Association to discuss and carry forward the intention of fire safety for all in a practically feasible manner.
2. To add a clause on the feasibility of Underwater or overhead tank, or widening of a staircase in a building to be determined



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by a certified/Govt recognised Architect and/or Civil Engineer so that any disaster may be averted due to the civil work being done without any such expert consultation randomly.

3. Deferment of any penal action till such the matter has been discussed and practically possible norms have been hopefully redefined.

4. To make the policy uniform throughout the state.

Thanking you,

Yours Sincerely,

(Dr. Vineeta Mittal)
President

(Dr. Sanjay Lakhtakia)
Chairman
Action Committee

(Dr. Sanjay Saxena)
Secretary

Encl : 1.Fire GO dated 07.01.2022 2.Relevant part of guidelines of Fire Rules 2024.

Copy To :

- 1.ACS(Health and Family Welfare).
- 2.DG (Uttar Pradesh Fire Service).
- 3.DG(HealthServices).
- 4.Chief Medical Officer, Lucknow.
- 5.Chief Fire Officer,Lucknow.