SC#26-8-10-a
D#26-9

Dawn Michele Bellis
Secretary, Standards Council

2 September 2026*

To: Interested Parties

Subject:

Standards Council Decision (Final):	**D#26-9**
Standards Council Agenda Item:	**SC#26-8-10-a**
Date of Decision:	20 August 2026
NFPA 101®, *Life Safety Code®*, 2027 Edition	

Dear Interested Parties:

At its meeting of August 18 – 20, 2026, the Standards Council considered an appeal on the above referenced matter. The Council's Final decision is now available and is attached herewith.

Sincerely,

Dawn Michele Bellis
Secretary, NFPA Standards Council

cc: D. McGonagle, T. Vecchiarelli, G. Harrington
Members, Correlating Committee on Safety to Life (SAF-AAC)
Members, TC on Residential Occupancies (SAF-RES)
Members, NFPA Standards Council (AAD-AAA)
Individuals Providing Appeal Commentary

*NOTE: Participants in NFPA's standards development process should know that limited review of this decision may be sought from the NFPA Board of Directors. For the rules describing the available review and the method for petitioning the Board for review, please consult section 1.7 of the Regulations Governing the Development of NFPA Standards and the NFPA Regulations Governing Petitions to the Board of Directors from Decisions of the Standards Council (see www.nfpa.org/regs). Notice of the intent to file such a petition must be submitted to the Clerk of the Board of Directors within 15 calendar days of the publication date of this Decision.

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SUMMARY OF ACTION (for convenience only; not part of official decision): The Standards Council voted to deny the appeal. The appeal was seeking to overturn the results of Certifying Amending Motion (CAM) 101-2 and thereby Reject Second Correlating Revision No. 20 including any related portions of First Revisions and First Correlating Revisions.

DECISION:
At its meeting of August 18 – 20, 2026, the Standards Council considered the appeal from William Koffel of Koffel Associates, Inc, representing Valet Trash and Recycling Valet Association. The appeal requested that the Standards Council overturn the results of CAM 101-2 for the 2027 Edition of NFPA 101®, *Life Safety Code®*. Specifically, the appeal requests that Section 31.7.5.2 requirements for valet trash services be deleted in its entirety.

As background, the requirements of valet trash services have evolved through the course of multiple revision cycles and has been the subject of multiple appeals in that time. During the current revision cycle, the Technical Committee revisited the issue at both first and second draft stages of the standards development process. Ultimately, following robust discussions, presentations, and balloting by the responsible technical committee, Second Correlating Revision No. 20 (SCR 20) was created by the Correlating Committee, achieved the necessary ¾ support and was recommended for inclusion in the 2027 edition of NFPA 101®. Following publication of the Second Draft Report, Mr. Koffel filed a Notice of Intent to Make a Motion (NITMAM) which was certified in accordance with the *Regulations Governing the Development of NFPA Standards* by the Motions Committee as CAM 101-2. The CAM failed to achieve the necessary support of the voting Association Members during the NFPA Technical Meeting. As a result, the recommendation to the Standards Council yielded by the standards development process is to include SCR 20 which provides that valet trash services shall be permitted only in buildings protected throughout by an approved, supervised automatic sprinkler system in accordance with 31.3.5.7.

During the hearing, the Council heard testimony regarding the history of valet trash services requirements in NFPA 101®. Appellant argued that there was a lack of evidence to warrant the expansion of fire protection to "approved, supervised automatic sprinkler system[s] in accordance with 31.3.5.7" in all buildings providing valet trash services. Pursuant to the *Regulations Governing the Development of NFPA Standards*, a Technical Committee has broad authority in the content of its response to public inputs and public comments, as well as in developing committee statements to accompany revisions. The record reflects that the Technical Committee responded to the available information provided in Public Inputs and Public Comments but was unpersuaded to maintain the fire protection requirements of the 2024 edition with regards to buildings with valet trash services.

Council further notes in response to the Appellant's argument that the Correlating Committee exceeded its authority in creating SCR 20 that the Correlating Committee acted in accordance with its duties established in the *Regs* and not beyond the actions contemplated under this authority.

On appeal, the Council accords great respect and deference to the NFPA standards development process. In

conducting its review, the Council will overturn the results of that process only where a clear and substantial basis for doing so is demonstrated.

The Council has reviewed the entire record concerning this matter and has considered all the arguments put forth in this appeal. In the view of the Council, this appeal does not present any clear and substantial basis upon which to overturn the results yielded by the NFPA standards development process. Accordingly, the Council has voted to deny the appeal. The effect of this action is that NFPA 101®, *Life Safety Code®* will include the text of Second Correlating Revision No. 20.

Council members Anthony Apfelbeck and Catherine Stashak recused themselves from the debate, deliberations, and vote on this appeal.