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**Date:** July 17<sup>th</sup>, 2024

**To:** Automatic Extinguishing Systems Committee

**From:** Andrew Henning, Assistant Deputy Director

**SUBJECT/AGENDA ACTION ITEM:**  
NFPA 25 Adoption Options

**Recommended Actions:**  
Motion Required

**Background Information:**

The NFPA 25 2013 California Edition - Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems was published in 2015 and is the current edition required for water-based fire protection systems maintenance. The 2013 California Edition was developed by the Office of the State Fire Marshal (OSFM) in cooperation with the OSFM's Automatic Extinguishing Systems (AES) Advisory Committee and was based on the 2011 edition of NFPA 25. Previously, California adopted the NFPA 25 2006 California Edition, which was based on the 2002 edition of NFPA 25.

NFPA has published four updates to NFPA 25 since the 2011 edition that incorporate new changes to the standard following NFPA's standards development process. NFPA 25 is on a three-year update cycle, with a new edition due to be published in 2026.

The AES Advisory Committee has been working on the next edition of the NFPA 25 California Edition based on the 2020 edition of NFPA 25.

**Analysis/Summary of Issue:**

The OSFM is evaluating and seeking input on how to proceed with the next edition of NFPA 25. There are three options that the OSFM is seeking input on:

- Option 1: Adopt the 2023 edition of NFPA 25, with minimum state amendments (there would not be a published California Edition)
- Option 2: Move forward with creating the next NFPA 25 California Edition based on the 2020 edition of NFPA 25.
- Option 3: Adopt the 2026 edition of NFPA 25, with minimum state amendments (there would not be a published California Edition) once NFPA publishes it.

### Option 1: Adopt the 2023 edition of NFPA 25

Option 1 would adopt the model standard of NFPA 25, 2023 edition, into Title 19, California Code of Regulations. There would not be a published California edition. The OSFM, through recommendations from the AES Advisory Committee, would be able to make amendments that would be published in Title 19. The OSFM would limit the number of amendments based on statutory requirements, and amendments that the OSFM determined were critical to fire and life safety. The forms currently published in Annex B of the NFPA 25 2013 California Edition would be adopted in Title 19. The OSFM would publish the adopted forms on the OSFM website.

If the OSFM adopted the model standard of NFPA 25, 2023 edition, the goal would be for the OSFM to adopt each new edition of NFPA 25 within two years of publication. For example, the proposed 2026 edition of NFPA 25 would be adopted in Title 19 in 2028. Some of the benefits of going to model NFPA 25 include the following:

- Faster adoption of the national model standard for use in California, allowing new technologies and national code changes to be used in California as new editions are adopted
- Moving the code development process to the NFPA Standards development process unless a critical fire and life safety amendment is identified.
- NFPA publishes the model standard of NFPA 25 in English and Spanish. Additionally, the standard is available digitally through NFPA LiNK and the National Fire Codes Subscription Service (subscriptions required).
- National training on the model standard is available through NFPA, NFSA, AFSA, etc.

### Option 2: Create a new version of NFPA 25 California Edition

Option 2 would move forward with a new version of NFPA 25 California Edition based on the 2020 edition of NFPA 25, which would replace the NFPA 25 2013 California Edition. Once the regulatory process is complete, the OSFM must set up contracts with NFPA and a publisher to produce the California Edition. It is anticipated that this will take around 24-36 months. The California edition would have all amendments and forms in one place for the user.

### Option 3: Adopt the 2026 edition of NFPA 25

Option 3 would have the same benefits as Option 1 but would not be formally adopted and implemented by the OSFM until around 2028.

### **Potential Industry Impacts:**

The OSFM will be moving to a new edition of NFPA 25. Industry partners will need to study the new edition to ensure they follow the standard's requirements.