

CONFIDENTIAL ADVISORY REPORT

Barcelona Indoor FEC Pre-opening Compliance Gap Analysis

Evidence-based regulatory readiness and remediation assessment

ATLAS SAMPLE - PREVIEW ONLY

ATLAS DECISION INTELLIGENCE

PRODUCT	Compliance Gap Analysis
SUPPORTING EVIDENCE	Barcelona-Indoor-FEC-Operations-Manual-V3-Preview.pdf
EVIDENCE SCOPE	70-page controlled pre-opening Operations Manual
FRAMEWORK	Spanish, Catalan and Barcelona pre-opening readiness
ASSESSMENT BOUNDARY	Hypothetical; readiness and gap assessment only
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1. Executive Summary

This pre-opening documentary review of the Barcelona Indoor FEC Operations Manual against the defined Spanish, Catalan and Barcelona readiness framework assessed 32 individual requirements. On the evidence supplied, none are Compliant at this stage; 15 are Partially compliant, 17 are Insufficient evidence and none are confirmed Non-compliant. Seven gaps are classified as P1 pre-opening gatekeepers to any public opening, centred on PAU approval, aforo/evacuation basis, municipal licensing under OMAIIAA, RIPCI commissioning/maintenance, REBT electrical legalisation, the PRL baseline, and HACCP deployment.

Evidence shows the manual maps the multi-layered framework and sets sensible governance, roles and checklists, but as a template it lacks site artefacts: approvals, certificates, registers and live records. The compliance_distribution and maturity_profile exhibits confirm a policy-heavy posture (maturity 1-2 across most domains). The gap_register and remediation_plan enumerate 24 actions with clear owners and target dates through 2026-09-30.

Implications for management are immediate: without closing P1 gaps G1-G7 within the stated windows, lawful opening is not possible. P2 gaps (G8-G13) should be closed during mobilisation to avoid early inspections, consumer/data complaints or tax/waste penalties. Priorities are consistent with the exhibits: commission and approve the PAU (A1), secure municipal licensing (A2), finalise aforo and align POS capacity (A3), establish RIPCI and REBT legalisation (A4-A5), publish the PRL plan and baseline risk assessments (A6), and deploy validated HACCP (A7). This report is a readiness and gap assessment, not certification or legal approval. Management can conclude that governance intent is sound but documentary compliance remains conditional on delivery of the specified artefacts and verifications.

2. Scope and Objectives

Scope: Assess the customer-supplied Barcelona-Indoor-FEC-Operations-Manual-V3-Preview.pdf as documentary evidence of planned governance and controls for a hypothetical indoor family entertainment centre in Barcelona. Distinguish what the manual covers from separate site-specific licences, approvals, certificates, inspections, registers and implementation records that remain pre-opening dependencies.

Objectives:

- Map the manual's policies, roles and procedures to the Spanish, Catalan and Barcelona framework: PAU, licensing, CTE DB-SI/DB-SUA, RIPCI, REBT, PRL, consumer controls, food hygiene/allergens, data protection/CCTV, accessibility, waste/EPR, finance/tax and attractions standards.
- Determine a status per requirement using only governed evidence: Compliant, Partially compliant, Non-compliant, Insufficient evidence, or Not applicable.
- Identify consequences, owners, due horizons and verification methods for each material gap, distinguishing P1 (must close pre-opening) from P2 (mobilisation) items.
- Present an actionable remediation sequence with target windows aligned to the exhibits.

Out of scope: Any statement on implementation, operating effectiveness, regulatory certification or the presence/condition of physical systems. Site inspections, authority interactions, commissioning tests, staff training completion and POS live data are deliberately excluded. Where paid standards (e.g., UNE-EN 13814) are referenced, only citation and governance integration are assessed. The output is an evidence-traceable readiness and gap assessment to guide mobilisation, not legal advice or authority approval.

3. Applicable Framework

The applicable framework for a Barcelona indoor family entertainment centre is multi-layered. Catalonia requires an approved PAU under Decret 30/2015 with filing via HERMES and trained roles/drills. Municipal licensing follows Llei 11/2009, Decret 112/2010 and local OMAIIAA annexes (2024) administered by Ajuntament de Barcelona. National building safety comprises CTE DB-SI (fire) and DB-SUA (safe use/accessibility), with active fire protection under RIPCI RD 513/2017. Low-voltage electrical legalisation and periodicity follow REBT RD 842/2002, including installer declarations and, where applicable, inspections by authorised bodies.

Workplace risk prevention is governed by Ley 31/1995 and RD 39/1997, requiring a PRL preventive plan, baseline risk assessments, an annual program/memory and training. Consumer obligations include official ACC complaint forms per Decret 121/2013. Food operations must implement HACCP and PRPs per Reg (CE) 852/2004, AESAN training criteria for handlers, and maintain allergen information compliant with Reg (UE) 1169/2011. Data protection is set by RGPD 2016/679 and LOPDGDD 3/2018; AEPD's Videovigilancia guidance mandates signage, access logs and retention ≤ 1 month.

Accessibility duties include built-environment provisions under CTE DB-SUA and service/communication obligations under Decret 209/2023, supported by RDL 1/2013. Additional obligations include smoke-free controls (Ley 28/2005; Ley 42/2010), waste segregation and documentation (ARC; Ley 7/2022), packaging EPR compliance (RD 1055/2022 as referenced in the compliance matrix context), VAT correctness and invoicing controls (AEAT tipos IVA; RD 1619/2012), and adoption of UNE-EN 13814 series processes for attractions governance. This framework defines the artefacts required for documentary compliance beyond policy intent.