

European Commission
DG Enterprise and Industry
B/1 Sustainable Industrial Policy and
Construction
Ms. Marzena Rogalska
1049 Brussels
BELGIUM

Copy to: Peter Schellinck (EOTA), Christophe Sykes (CPE)

Baden-Baden, 13 January 2015

Large-scale fire-testing for ETICS

Dear Ms. Rogalska,

in a letter to EOTA on 30 June 2014 we already expressed our concerns on behalf of the European manufacturers of External Thermal Insulation Composite Systems (ETICS) regarding the situation with non-harmonized fire tests for façade systems in Europe.

Whereas on the one hand the EAE strongly supports the European harmonization of ETICS as kits for thermal improvements of buildings' envelopes, we clearly recognize that one important aspect is not harmonized at all: the large-scale fire-test. Even worse, it seems that Member States tend to establish new, non-compatible national fire tests at national level.

For our industry this clearly turns out to be a barrier to trade. Non-harmonized large-scale fire tests are a costly burden not only for our industry but also for European wide operating designers and construction companies. Without harmonization a common market for ETICS cannot be fully established. Therefore we ask the European Commission to take action.

Already today system holders have to perform different tests when distributing their ETIC systems to different Member States. In practice especially the German and the U.K. requirements are relevant at the moment. Austria adopts the German test procedures as they have been developed together with the German and Austrian ETICS association almost a decade ago. Recent tests on behalf of the German conference of construction ministries approved that tests according to prDIN 4102-20 sufficiently cover the scenario of room fires. ETICS performing the test successfully limit the spread of fire on the façade after the flash-over and therefore allow rescue efforts.

As far as we are informed EOTA PT4 already elaborated a draft Technical Report for large-scale fire tests for ETICS, covering the scenario of a room fire with flames escaping through the window opening to the front of the façade. The scenario takes in consideration the technical abilities of fire fighters to extinguish the fire of a burning façade (buildings of medium height and tall buildings). The draft also considers two different levels of thermal load.

With this approach EOTA PT4 covers different national building codes (national safety requirements). In fact the EOTA proposal represents just one test procedure, following the aims of a former CEN mandate. Only the fire load creates the difference:

- Level 1 is performed with a 30 kg wood cradle (modeled approach).
- Level 2 is performed with a 400 kg wood cradle (full-fire approach with security surcharge).

The height of the test bench has to be chosen according to the intended fire load, of course.

Similar test procedures using different levels can be found in several European test procedures, e.g. regarding external fire performance of roofs, test methods and classification.

We strongly recommend establishing this EOTA draft as European harmonized technical specification. Member States can then establish national safety levels e.g. for different building types, building heights, or specific uses.

By this approach it should be possible to declare different classes of performance for façade insulation systems.

For example:

- Class 0: Without further testing.
- Class 1: Limited spread of fire on the façade (30 kg wood cradle).
- Class 2: No spread of fire on the façade (400 kg wood cradle).

With these classes Member States are able to describe their national safety levels in relation to different building types and different uses.

As the EOTA PT4 draft seems to be almost completed, EAE strongly recommends proceeding with the work already done. Any new mandate would further delay the harmonization efforts by years and opens the door for Member States to establish a variety of national standards, making harmonization even more complicated or even impossible.

After this EOTA PT4 document is published and certain experience is available, the mandate could be given to CEN according the rules set out by the Construction Products Regulation to elaborate an European harmonized standard.

As EAE we would like to express our willingness to support efforts to improve customer safety European wide and to establish a common market for construction products. Both will be essential to achieve Europe's ambitious energy efficiency objectives and to generate sustainable growth in the construction business.

If you have any questions please do not hesitate to contact me.

Best regards



Ralf Pasker, Managing Director



About EAE

The EAE is the European association for External Thermal Insulation Composite Systems (ETICS), formed by 11 national ETICS associations, five major European supplying materials' associations and several supporting members, which include ETICS manufacturers and research institutes. The EAE represents about 85 per cent of Europe's revenue from ETICS. The main objectives of the association are to further promote the benefits of using ETICS and to support the safe and durable use of ETIC systems.

EAE represents the ETICS business in CEN and EOTA working groups. The EAE is a member of Construction Products Europe and the European Council for Construction Research, Development and Innovation (ECCREDI). Furthermore EAE is in contact with associations and initiatives beyond European borders, e. g. in China and Japan.