



European Association for External Thermal Insulation Composite Systems
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European Commission
DG for Internal Market, Industry, Entrepreneurship and SMEs
Unit C.1 – Clean Technologies and Products
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Fire assessment of facades – document CPR 09/6/1

Dear Mr Katsarakis,

we received the document mentioned above circulated to SCC members in advance to the next SCC meeting on 24 – 25 September 2015. The EAE supports the efforts of the European Commission to establish a European fire assessment of facades. As you know the EAE requested such a solution for a long time to establish a Single Market for External Thermal Insulation Composite Systems (ETICS or EIFS) in Europe.

Following earlier comments we made on this issue we would like to share our views regarding the Commission's options as described in the document:

1. The EAE is in favor of EC's position to allow two different levels of fire load for assessments. This was always requested by EAE and its members to meet the existing requirements established in several Member States.
2. If some Member States are in favor of having only one test for fire assessment of facades one should keep in mind that the fire-safety regulation in Europe differs at this moment, laid down in national building codes. This will even in the future be the case as the requirements for the construction works are under the full responsibility of Member States according to the Construction Products Regulation (CPR). To comply with different safety levels in Member States manufacturers must have the possibility to assess their systems accordingly. And European harmonization must not lead to a situation where products legally placed on the market for years have to be withdrawn or have to face significant limitation in the field of application.
3. Member States being in favor of having only one test for fire assessment of facades should keep in mind that we already have the situation regarding small scale tests where fire assessment of construction products is performed according to different tests depending on the intended classification level.

4. To our opinion the EOTA Report N073 represents in fact only one test with two different options of fire load. The test design as such is the same. This approach complies with the system of levels and classes as described in the CPR. Manufacturers can choose which class of fire-safety they want to achieve to comply with the regulation in those Member States where they want to place their products on the market.
5. We would like to point out that BS 8414-1 is only used in the U.K. (maybe also in Ireland) for fire assessments of facades. However, a significant number of ETIC systems have been assessed according to this standard. An even larger number of ETICS has been assessed according to the German test method, which is relevant for Germany, Austria and Switzerland.
6. In order to have a quick solution the EAE is in favor of at first following EC's option A with one amendment. The BS 8414-1 should be "complemented by *assessment of falling parts*" (instead of SP SP Fire 105). With option A the industry would have an immediate resolution.
7. In the long run, however, EAE would prefer establishing a test method based on EOTA Report N073, following EC's option B, complemented by an optional assessment of falling parts. The task should be left to EOTA as the draft elaborated by EOTA experts is completed and the description of the future test method only requires finalization.

The EAE would like to clearly point out its support to establish European harmonized assessments of fire-safety of façade systems as ETICS are the most commonly used façade systems in Europe with an annual market volume of more than 200 mil. m².

Best regards



Ralf Pasker
Managing Director