

EOTA - European Organisation for Technical Assessment
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Copy to: Ms. Marzena Rogalska/DG ENTR

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Large-scale fire-testing for ETICS

Dear Peter,

as I already mentioned in my presentation about the current standardization efforts for External Thermal Insulation Composite Systems (ETICS) during the CEN Construction Sector Network Conference 2014 last week our association and its members support establishing European harmonized technical specifications to ensure barrier-free trade in the EU Common Market. Several EAE experts are deeply involved in the drafting procedures of the future ETICS standard and EOTA's collaboration is well-recognised.

While the draft standard develops, we observe that there is still a lack of harmonized large-scale fire tests for ETICS. Even worse, it seems that Member States tend to establish new, non-compatible national fire tests at national level. On behalf of our members I would like to express our strong concerns regarding this situation.

Non-harmonised 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. Already today system holders have to perform different tests when distributing their ETIC systems to different Member States. In practice especially the German and 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.

As far as we are informed EOTA PT4 already elaborated a draft Technical Report for large-scale fire tests for ETICS taking in consideration existing German and British standards. We strongly recommend establishing these results as European harmonized technical specification. Member States can then establish national safety levels e.g. for different building types, building heights, or specific use.

To give an indication about the economic impact of different tests from manufacturer's perspective:

- Existing ETAs for ETICS in Europe: > 800
(national approvals not included)
- Costs for performing large-scale fire tests: about €10,000/single test
(preparation of test samples included)

Examples: number of test procedures in Europe	Individual manufacturer's economic impact 5 different ETICS (example)	Sector's economic impact 800 ETICS
2 different test procedures	€100,000	€16,000,000
10 different test procedures	€500,000	€80,000,000
20 different test procedures	€1,000,000	€160,000,000

One should keep in mind that though our sector knows few huge international companies, most of the ETICS business is driven by family-owned SMEs. Furthermore existing test capacities for large-scale fire testing are quite limited.

These figures clearly demonstrate why European harmonized test procedures are urgently recommended by EAE members. National efforts to establish deviating test procedures should be prevented.

As the EOTA PT4 draft seems to be almost completed, EAE recommends proceeding with the work already done. Any new mandate would delay 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.

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.

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

Best regards



Ralf Pasker
Managing Director