Dear Mr Dornan,

I am writing further to your Committee’s Evidence Session on November 20, at which you received verbal evidence from representatives of the Association of British Insurers, the Fire Protection Association, the Royal Institution of Chartered Surveyors and University College London.

The following are follow-up comments, offered on behalf of Engineered Panels In Construction (EPIC). EPIC is the trade association representing 100% of the UK’s manufacturing capacity for steel-faced insulated sandwich panels.

We wish, firstly, to correct some matters of fact in the evidence received by the Committee on November 20.

In particular, we were concerned at the assertion that the use of BS8414 tests has been banned in England. This is not at all the case.

BS8414 is still very much in use and is an accepted route to compliance in England for all buildings other than the ‘relevant buildings’ outlined in 7(2) of the Building Regulations and Approved Document B: volume 2, part B4. The present standard was considered for periodic review this time last year. Some 320 submissions are being considered concerning the nature and scope of the test, which reflects the intensity of public interest.

The BSI Committee reference FSH/21/-/19 is considering these comments in depth and will publish the revised standard in due course. We are aware that the BSI Committee does include a representative from the Scotland Government Building Standards Division.

The insurance industry has long taken the view that large-scale system fire-tests provide a robust benchmark of performance. Insurers have written two widely-used and internationally-recognised tests of their own, based around BS8414 methodology, to bring the peculiar rigour they require to large-scale system testing. These are:

- LPS1181 (a UK methodology, authored and maintained by the Loss Prevention Council under the aegis of the Building Research Establishment) and
- FM 4880/4771 (administered by the FM Global insurance group).

It is, perhaps, worth recording that neither the LPCB nor FM considers their current tests are in need of any overhaul.

As regards the issue of ‘desk top studies’ (or ‘extended field of application’ studies, as they are called by fire engineering professionals), it’s correct to say these were essentially suspended in England at the end of 2018, because of concerns about lack of definitive guidance. However, this has been addressed by the introduction of BS9414, to which Dr Jim Glockling referred at your evidence session. This has recently been published as the way to extend the field of application of BS 8414 tests.

As Professor Torero commented at your Committee’s hearing, installer competence is a key issue. It was clear not all members of your Committee were aware of the Raising The Bar report, which summarises the work of 14 industry working groups who have been looking at competency in the wake of Dame Judith Hackitt’s Grenfell report. There is a useful and digestible summary from the Industry Response Group, as well as a copy of the interim report itself.

EPIC appreciates this evidence-session was part of a far wider brief. So we would make one further point about your Committee’s discussions around testing regimes: questions about fire behaviour are not
informed purely by academic opinion, large-scale fire tests and engineering excellence. There is a large body of real-life evidence (this link is merely to EPIC’s modest bank, for our very specialist niche) of as-built structures upon which both SFRS and Scottish Government can draw.

By definition, real-life fires reflect the warts-and-all realities of the properties in question. So they automatically factor-in the effects of ‘competence’ of the various individuals who undertook the building work.

EPIC members’ panels are widely used for commercial and warehousing buildings, schools, cold-stores, offices and mixed commercial/housing developments. Because they are both ‘metal’ and ‘cladding’, they have been widely and regularly confused with the highly combustible metal-faced façade which failed so catastrophically at Grenfell Tower.

For this reason, EPIC has been engaging very pro-actively with insurers, architects, specifiers and policy-makers over the course of the two and a half years since Grenfell forced fire safety so tragically on to the policy agenda. One major thing we have learned from this experience is that many people -- even highly-trained professional people -- are unclear about the distinction between ‘combustible’ products and ‘flammable’ products.

These two words have been frequently used interchangeably, which has caused both confusion and concern. Whilst both technically mean they are capable of burning, there is a significant difference between the two. ‘Combustible’ is a blanket term which means that the material could be ignited under specific conditions. On the other hand, ‘flammable’ is a sub-category of combustible behaviour. It applies to materials which are more volatile, can be easily ignited, and self-sustain a flame after exposure.

At the other end of the scale, some products categorised as ‘combustible’ may react to fire exposure, but their response is more stable and they typically don’t self-sustain a flame once the heat-source is removed.

It’s important that we make this distinction because products such as EPIC members’ panels have proven fire performance but are technically classed as ‘combustible’. Even though they can perform similarly to non-combustible systems in large scale system tests – and, more importantly, in real fires.

Home Office statistics demonstrate the vast majority of fires begin (as did the fire at Grenfell) with an electrical short-circuit or a dropped cigarette end igniting (flammable) building contents. The main life-safety issue to consider is therefore how far and how soon any combustible elements of the building fabric are likely to contribute to the development and spread of a fire which begins with the furnishings of a home or the contents of a building.

We would be grateful if you could draw these comments to your Committee’s attention, in the hope they might inform a more holistic understanding of the issues.