

EUMEPS (european EPS Association) coments to the Draft Royal Decree amending Royal Decree 314/2006 of 17 March 2006 approving the Technical Building Code

DOCUMENT SECTION	WHERE IT SAYS:	SHOULD SAY:	JUSTIFICATION
Section SI 2 Exterior propagation, subsection 1 "Dividing walls and façades". Bullet Point 4	The reaction to fire class of façade coatings that occupy more than 10 % of the surface area shall be as follows, based on the total height of the façade: - D-s3,d0 on façades up to 10 m high; - C-s3,d0 on façades up to 18 m high; - B-s3,d0 on façades higher than 18 m	The Reaction to fire class of the construction systems of the façade that occupy more than 10 % of the surface area shall be as follows, based on the total height of the façade: - D-s3,d0 on façades up to 10 m high; - C-s3,d0 on façades up to 18 m high; - B-s3,d0 on façades higher than 18 m	The reaction to fire behaviour is evaluated in the end use application, that is the whole construction system. With the current wording, it can be interpreted that all the components of a construction system must individually justify their reaction to fire behaviour in order to comply with the CTE DB SI. Therefore, it is proposed to indicate "Construction systems" since these systems are currently tested, as for example in an ETICS, where the classification of reaction to fire covers the entire construction system, not only the coating.
Section SI 2 Exterior propagation, subsection 1 "Dividing walls and façades". Point 5	Insulation systems situated inside ventilated chambers must have at least the following reaction to fire class, based on the total height of the façade: - D-s3,d0 on façades up to 10 m high; - B-s3,d0 on façades up to 28 m high; - A2-s3,d0 on façades higher than 28 m	Construction systems situated inside ventilated chambers must have at least the following reaction to fire class, based on the total height of the façade: - D-s3,d0 on façades up to 10 m high; - B-s3,d0 on façades higher than 10 m	The reaction to fire behaviour is evaluated in the end use application, that is the complete construction systems. In some circumstances, such as insulation materials, it is necessary to justify the euroclass of the product as placed on the market is without any non-integrated installation means only for CE marking purposes. With the current wording, it can be interpreted that only the main insulation material should justify their reaction to fire behaviour. Therefore, it is proposed to indicate "Construction systems" since these systems are currently tested, as for example in an ETIC system, where the classification of reaction to fire covers the entire construction system, not individual components. Moreover, it can be interpreted that a mineral wool product covered by a vapour barrier and installed inside a ventilated chamber, should provide the reaction to fire class of B-s3, d0 both for the mineral wool and for the vapour barrier. The inclusion of an euroclass A2 instead of an euroclass B, will not prevent the fire spread on the outside of the façade, since there is a fire propagation mechanism on the outside of a façade called "Frog Leap" that affects even to incombustible products (A1 and A2). The fire spread to higher storeys occurs through the smoke and flames that break through the effect of the temperature of the windows of the upper storeys, a process that is even produced with A1 or A2 products.
Section SI 2 Exterior propagation, subsection 1 "Dividing walls and façades". Point 6	For façades 18 m high or less whose lower level is accessible to the public from the exterior grade or from a roof, the reaction to fire class of the exterior finishes mentioned in subsection 4 and of the insulating material situated inside the ventilated chambers, where applicable, must be at least B-s3,d0 up to a height of at least 3.5 m	For façades 18 m high or less whose lower level is accessible to the public from the exterior grade or from a roof, the reaction to fire class of the construction systems mentioned in subsection 4 and those situated inside the ventilated chambers, where applicable, must be at least B-s3,d0 up to a height of at least 3.5 m	The same explanation above
Rest of the DB SI "Fire Safety"			To address the fire spread in façades, it must be understood that fire safety will not only depend on the reaction to fire requirements, it is necessary to implement other measures that have worked satisfactorily in other countries, such as the installation of smoke detectors in homes or the installation of sprinklers in high-rise buildings. These measures are aimed at preventing the spread of the fire in its initial phase and therefore its implementation could prevent the development of the fire to the façade.