



Rt Hon James Brokenshire MP
Ministry for Housing, Communities and Local Government
2 Marsham Street
London
SW1P 4DF

10th August 2018

Dear Secretary of State,

Following on from our follow up meeting on the 7th August regarding the industry response to performance and compliance issues of composite fire doors; please consider this letter as our update promised in our initial communication of last Friday. For ease of explanation I have kept the format very much the same as previous.

Immediate Concerns

There is real worry in the industry at the moment; with feedback from fire door fabricators and installers that without any doors to place on the market, 'every day pushes us nearer to going out of business'. Jobs are already being lost to cope with the decrease in – and in some cases the absence of – revenue.

In addition to this, the recent articles effectively naming and shaming five door suppliers, whose products are failing to meet the requisite fire performance standard, is singling them out and subjecting them to excessive pressure from their clients. This pressure is drawing attention away from the vital steps required to resolve these issues. There is a clear message which needs to be communicated to local government, trading standards offices and the fire door community as a whole, to give the industry space to develop the solutions. This is an acknowledged industrywide issue which industry is currently working hard in

conjunction with the MHCLG to put right, and any pressure applied will be hugely detrimental to this process.

Whilst we will prepare a message from industry to communicate what steps are being taken, we would ask that MHCLG 's communicate directly, to this effect, with Local Authorities and registered social landlords.

It is also strongly urged that local authorities are notified of the critical role they will have going forward in assessing the risk associated with existing fire doors.

With regards to the immediate action required to stop the supply of fire doors that are inconsistent with the current building regulations

Having agreed to cease supply (unless the fire doors in question can demonstrate consistent furnace test performance to the appropriate standard from both sides) of composite doors at the last meeting; the subsequent objective is to take urgent steps to get doors tested, and get them back on the market. This will be an industrywide approach commencing initially with door slab manufacturers working together, basing tests on a basic specification of door (no glazing and no letter plates) with the objective being to obtain further evidence for compliance.

Concern was expressed regarding the availability of test slots, as well as the turnaround time of the test results. Subsequent communications with Chandru Dissanayeke have confirmed that you have agreed to release some of the UK test capacity currently taken by the MHCLG; in addition we are currently investigating the slots offered by Underwriting Laboratories in Germany. We are grateful for your assistance in both instances; however current feedback is questioning the stated availability of UK test slots. In order to optimise the use of available slots we need communication between MHCLG, testing houses and the ACDM in order to assess precisely how many and when slots are available; so they can be allocated for the collective benefit of the industry.

At numerous points during the meeting, the need for information regarding the mode of failure of the testing undertaken by the MHCLG was stressed. There was a general feeling of cooperation within the group to share this information, but it needs to be provided as a matter of urgency. We believe that this information will be delivered to the Glass and Glazing Federation by Monday/Tuesday next week. We are grateful for the provision of this information, which will be analysed immediately upon receipt.

Association of Composite Door Manufacturers Limited

Registered Office: Temple Court, 13A Cathedral Road, Cardiff, CF11 9HA

Registered Number 4379424

website: www.acdm.co.uk

With regards to a consideration on how to deal with any issues with fire doors already supplied

It was agreed that there has to be a systematic approach to this issue; as a result we have engaged with Matthew Bowler (Assistant Director – Head of Engagement; MHCLG) with regards to the formulation of a 'risk matrix'. Matthew's involvement will be to establish a ministry approved definition of doors in high and low risk areas; pertaining to either building type, or location within the building. It was subsequently confirmed that the group has a meeting arranged with Matthew Bowler currently scheduled for September 4th.

We will combine this information with an analysis of high and low risk composite fire doors. From these two sets of information we can then establish the quantity of doors which are at greater risk of failure, in buildings which door failure presents the greater risk.

To assess the volume of doors in this critical category, there was strong belief that engagement with local authorities will be vital to provide this information through the provision of fire risk assessments of buildings in their region.

We will also be conducting a volume analysis of doors supplied over the last ten years, in order to obtain a more accurate figure for the number and types of doors currently in use.

With regards to a plan of how the industry can shape it's future

There remains wholehearted commitment to providing a radical review of the entire process associated with specifying, fabricating, installing, certifying and monitoring fire doors. Although the cause of this review is tragic; it presents an opportunity to analyse the system's shortcomings and focus on putting them right.

It was agreed that whilst the process as a whole will consist of multiple actions, the starting point is to engage with the senior management of testing and certification houses, which are critical to the process; this has already begun. The chief points of discussion are the availability of test slots, the turnaround of test reports, and technical input in order to gain an industrywide agreement on the specific use of assessments through extended applications. There is a recognition that the industry cannot function without assessments; but their use needs to be fully defined. It was also agreed that a definition of 'consistency' will have to be agreed with all parties.

Tying in with Dame Judith Hackitt's independent review of building regulations, the journey of the specification for fire doors is also imperative. The 'golden thread' which traces an original specification and subsequently tracks any changes to that specification – along with the responsible party for doing so – must apply for fire doors. The belief is that this process will highlight where any non-compliance may occur.

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As per our previous communication, we remain committed to addressing the issues raised by MHCLG and will provide a further update on progress next week.

Yours sincerely

Ben Penson
Chair
Association of Composite Door Manufacturers

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