From: Joel Clarke

Sent: 17 October 2013 11:58
To: 'Gayetree Ramkorun'

Cc: 'jalbon@bba.star.co.uk'; Ivor Meredith; Gareth Mills

Subject: RE: extremely urgent S247070 K15

Follow Up Flag: Follow up Flag Status: Flagged

Dear Gayetree,

Thanks for the reply: we respect the BBA's position. Unfortunately in this case we still feel some of our points are not being fully considered, particularly those relating to the phrase 'buildings above 18m' which has been placed on the first page. We have some additional comments in red below, which will hopefully clarify what we mean.

Hopefully we will get time at the end of tomorrow's meeting to iron this out once and for all.

Joel Clarke

SENIOR TECHNICAL ADVISOR - DEVELOPMENT

direct tel: direct fax:

From: Gayetree Ramkorun [mailto:gramkorun@bba.star.co.uk]

Sent: 09 October 2013 13:38

To: Joel Clarke

Subject: RE: extremely urgent S247070 K15

Dear Joel

Thank you for your email.

After discussion with John, we confirm that the current draft you received is technically correct.

Please see below in green.

Kindest regards Gayetree

Gayetree Ramkorun BSc (Hons.) MSc CSci MEI

Team Manager - Approvals
British Board of Agrément
Bucknalls Lane, Watford, WD25 9BA *
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From: Joel Clarke [mailto:joel.clarke@kingspan.com]

Sent: 26 September 2013 14:07

To: Gayetree Ramkorun

Cc: John Albon; Gareth Mills; Ivor Meredith **Subject:** RE: extremely urgent S247070 K15

Hi Gayetree,

Apologies for the late reply and I hope you've been keeping well since our last meeting. I believe Ivor raised this issue with John and Claire at their recent meeting here at Kingspan, so I hope you don't mind me copying John in on this reply.

Not at all.

The first point we'd like to make is just that we were a little bit surprised at the content of the final draft, mainly because it differed from what we had agreed on 5th June. We were very much under the impression that content had been agreed on both sides and that issuing the certificate was nothing more than a formality. I've attached the email trail which I hope explains why we were under this impression.

I must apologise for any misunderstanding but I believe the current draft you received is saying the same thing/technical content as agreed before but just in a slightly different way.

The difference is slight in one sense but very significant in another. The earlier draft strongly implied the limitations of the testing. The later one makes an explicit assertion about how the BBA believe this data should be interpreted in light of Part B.

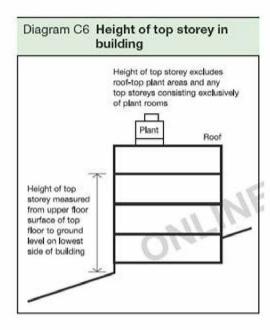
More importantly though, and as for the new content itself (particularly the statement added to the first paragraph): now we've examined it, we believe the statement is misleading and would make two points.

Firstly, the certificate covers the product for use with a masonry inner leaf, and also covers the possibility of an exterior masonry leaf. In circumstances where the insulation is between two leaves of masonry of 75mm thickness or greater then the requirements relating to BS 8414 / limited combustibility do not apply. This product is for insulation behind cladding, and is bonded to a cement board on a rail, it is not installed in a masonry cavity wall application, so this point would be irrelevant here, I should think?

The product is not always installed against a sheathing board – the certificate covers installation against masonry/concrete inner leafs too. The certificate also covers external masonry leafs.

Secondly, the requirement in Part B is not for 'buildings over 18m'. The requirement relates to those buildings which have habitable storeys greater than 18m from ground level (where a storey's height is defined as the height at the top of the floor of the storey, i.e. the bottom of the storey). This means the minimum height of a building subject to the BS 8414 / limited combustibility requirements is likely to be at least 21m. As top storeys containing plant rooms (not considered 'habitable') are quite common it is not unusual for a building to be 25m in height and still not subject to the requirement. I believe we are saying up to 18 m and the tested one can be used on over 18 m, so I don't understand where the 21 and the 25 are coming from?

The problem we see is that the phrase 'buildings above 18m' is vague and could easily be misunderstood. The term 'building height' as understood by most people, and 'storey height' as defined in Approved Document B, are totally different things. The height of the building, as commonly understood by most people, is the length from ground level to the final surface, i.e. the top of the roof. However, the BS 8414 / limited combustibility requirement applies to storey height, not building height. Please see diagram below, taken from Approved Document B2. I hope this helps explain:



Given these two points, we feel the statement could mislead our clients.

We feel the original agreed content already served to adequately express the limitations of this particular testing on the product.

We had, for example, agreed to the following being implemented at 1.2:

(1) Other board size and thicknesses may be available on request but corresponding reaction to fire for the cladding system incorporating the product will need to be assessed.

And...

(2) For thicknesses other than the 60 mm (as tested in section 8.1), the Certificate holder should be consulted to determine fire performance of these thicknesses and construction types.

We had to split this: part in description and part in the fire sections. So we will keep the latest draft version, this is our style format. i.e:

In the description 1.2: (1) Other board sizes and thicknesses may be available on request.

In the fire section 8.2: (1) The test result relates only to this specific construction and a separate test would be required to establish the performance of any other combination of materials.

In the 'Fire' section it is already clearly stated that:

(1) The test result relates only to this specific construction and a separate test would be required to establish the performance of any other combination of materials

Please see above.

Given these, we would contend the agreed content was already clear about the limitations of the testing undertaken (particularly in relation to the specific thickness and system tested) and was therefore adequate in giving the specifier unbiased, objective information on which to base their approach.

I hope this clarifies our position on the matter. If it doesn't then, of course, please don't hesitate to contact me to discuss and I will clarify. We understand that BBA are keen to get this resolved ASAP and I can assure you of our closest attention.

So these notes and the scope we will keep, please, thank you.

Joel Clarke SENIOR TECHNICAL ADVISOR - DEVELOPMENT direct tel: direct fax:

From: Gayetree Ramkorun [mailto:gramkorun@bba.star.co.uk]

Sent: 18 September 2013 13:19 **To:** Gareth Mills; Joel Clarke

Subject: extremely urgent S247070 K15

Importance: High

Dear Gareth and Joel I really need this issued asap.

Please advise me of the comments you had.

Thanks Gayetree

Gayetree Ramkorun BSc (Hons.) MSc CSci MEI

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