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## Reaction to Fire Classification Without Testing

Caught in the middle of the transition from the CPD to the Construction Products Regulation (Regulation (EU) No 305/2011) and thus subject to a series of procedural changes, EMO has been awaiting the outcome of its request for a Commission Decision on the Classification Without Further Testing (CWFT) regarding the reaction to fire of internal plasters and external renders based on organic binders for more than 5 years. But **finally, the patience and persistence of EMO paid off:** on 8 July 2017 the “Commission Delegated Regulation (EU) 2017/1228 of 20 March 2017 on the conditions for classification, without testing, of external renders and internal plasters based on organic binders covered by the harmonised standard EN 15824 and rendering and plastering mortars covered by the harmonised standard EN 998-1 with regard to their reaction to fire” was cited in the Official Journal of the European Union. Although

Maximum organic content (2) (% in weight)	Maximum
≤ 9,0	
≤ 2,5	
≤ 4,0	
≤ 5,0	

the Regulation will formally enter into force by the end of the month, practically as off now, **manufacturers of mortars which fulfil the conditions set out in the Annex of the Delegated Regulation can start saving costs** by assuming and declaring the classes of performance indicated in the Annex without testing. The [Delegated Regulation can be downloaded from EUR-Lex](#) in the relevant official languages.

Initially EMO’s request addressed only mortars according to EN 15824 with an applied thickness of up to 3 mm. Based on a few additional test results and with the support of some of the experts in the relevant European Commission’s Advisory Group, the 3 mm thickness limitation was dropped and the scope extended to also cover respective EN 998-1 rendering and plastering mortars. This extension and additional flexibility must be appreciated, even if only a limited range of EN 998-1 rendering and plastering mortars may benefit from it.

The present Delegated Act falls under the Simplified Procedures and represents an Appropriate Technical Documentation (ATD) according to article 31.1 (a) of the Construction Product Regulation. ATDs can be used to replace type testing or type calculation and therefore generally apply to the product type determi-

nation stage, i.e. the stage when the product performances are determined prior to drawing up the declaration of performance for the product. But consequently, in the course of the verification of the constancy of performance, i.e. with regards to factory production control, instead of testing the performance(s) covered by the ATD the manufacturer verifies that the conditions to apply the ATD are met.

In contrast to declared performances based on tests, in case of performances declared using ATDs Annex III of the CPR, as amended by the [Commission Delegated Regulation \(EU\) No 574/2014](#), requires additional information to be included in the Declaration of Performance. In these cases apart from the performance (here class) manufacturers also need to indicate the reference number of the Appropriate Technical Documentation used and the requirements with which the product complies. In the present case, this means indicating the reference “Delegated Regulation (EU) 2017/1228” as well as the applicable maximum organic content and maximum mass per unit area.

Content <sup>(2)</sup>	Maximum mass per unit area <sup>(3)</sup> (kg/m <sup>2</sup> )	Class <sup>(4)</sup>
	≤ 4,0	B - s2, d0
	≤ 6,0	A2 - s1, d0
	≤ 4,0	
	≤ 2,0	

It goes without saying that:

- Delegated Regulations on the Classification Without Further Testing are generally not compulsory and therefore manufacturers may continue to declare the performance of products based on testing, even if these meet CWFT conditions of the relevant Delegated Regulation. This makes sense when the tested performances allow a better classification than the relevant Delegated Regulation.
- Commission Decision 96/603/EC, as amended by Commission 2000/605/EC, according to which mortars containing ≤ 1,0 % (by mass or volume, whichever is the more onerous) of homogeneously distributed organic materials are classified as reaction to fire Class A1 without testing remains valid.

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