



GUIDANCE NOTE

Ref: WPA FR 8

Issue 2: July 2022

Understanding

The Flame Retardant Treated Wood Supply Chain

Introduction: The Construction Products Regulation (CPR)

Marking of construction products (*those and only those covered by a designated [GB]¹ or harmonised [EU] European standard*) is **mandatory** – under respectively The Construction Products (Amendment etc.)(EU Exit) Regulations 2019 (UKCPR) and the EU Construction Products Regulation (CPR). Designated and harmonised standards include guidance on the minimum information that should be included with the mark – **UKCA (GB)** or **CE (EU)**.

Those who manufacture construction products for which a harmonised or designated standard exists have an obligation to draw up a **Declaration of Performance (DoP)** and apply a **UKCA** or **CE** mark when the product is first placed on the market. The key CPR definitions are explained in *Guidance Note WPA FR 4*.

UKCPR and CPR place obligations on manufacturers to draw up documentation as the basis for the DoP, describing all the relevant elements related to the required system of assessment and verification of constancy of performance (AVCP).

UKCPR and CPR require that:

*...any process which results in an improvement to a materials 'reaction to fire' classification, be controlled in accordance with 'Assessment and Verification of the Constancy of Performance' (AVCP) system level 1. System 1 requires that an **approved body**² be involved in assessing the performance of the product, an initial inspection of the treatment plant and continuing surveillance of factory production controls.*

NOTES:

1. GB: England, Scotland and Wales. Northern Ireland is currently regulated under EU rules.
2. An approved body is an organisation approved by the UK government (a notified body in the EU) to assess the conformity of certain products before being placed on the market. These bodies carry out tasks related to conformity assessment procedures set out in the applicable legislation, when a third party is required. Third party assessment is required for safety critical criteria such as the performance of a material in fire.

Different routes to CPR compliance

Integral to Manufacture

Where the flame retardant (FR) is added in the factory during the manufacturing process for MDF, OSB or plywood, then that manufacturing process should be subject to factory production control (*accredited by an approved body to AVCP system 1*). The product should carry the UKCA or CE mark and be accompanied by a valid DoP which includes the improved **reaction to fire** class claim being made by the manufacturer when it leaves the factory.

Service Treatment

Where distributors/owners of non-FR stock send material (*solid wood, some plywood*) to a third-party service treater for factory FR treatment (*before selling that treated stock on into the open market*), the **distributor** takes on the responsibilities of the **manufacturer**.

The distributor is the first person placing the FR treated product on the market and so must produce and take responsibility for the DoP. Both **distributor** and **service treater** must operate factory production controls which have been accredited by a notified body to satisfy the requirements of **AVCP 1**, so as to maintain the full traceability which must underpin the DoP and the UKCA or CE mark.

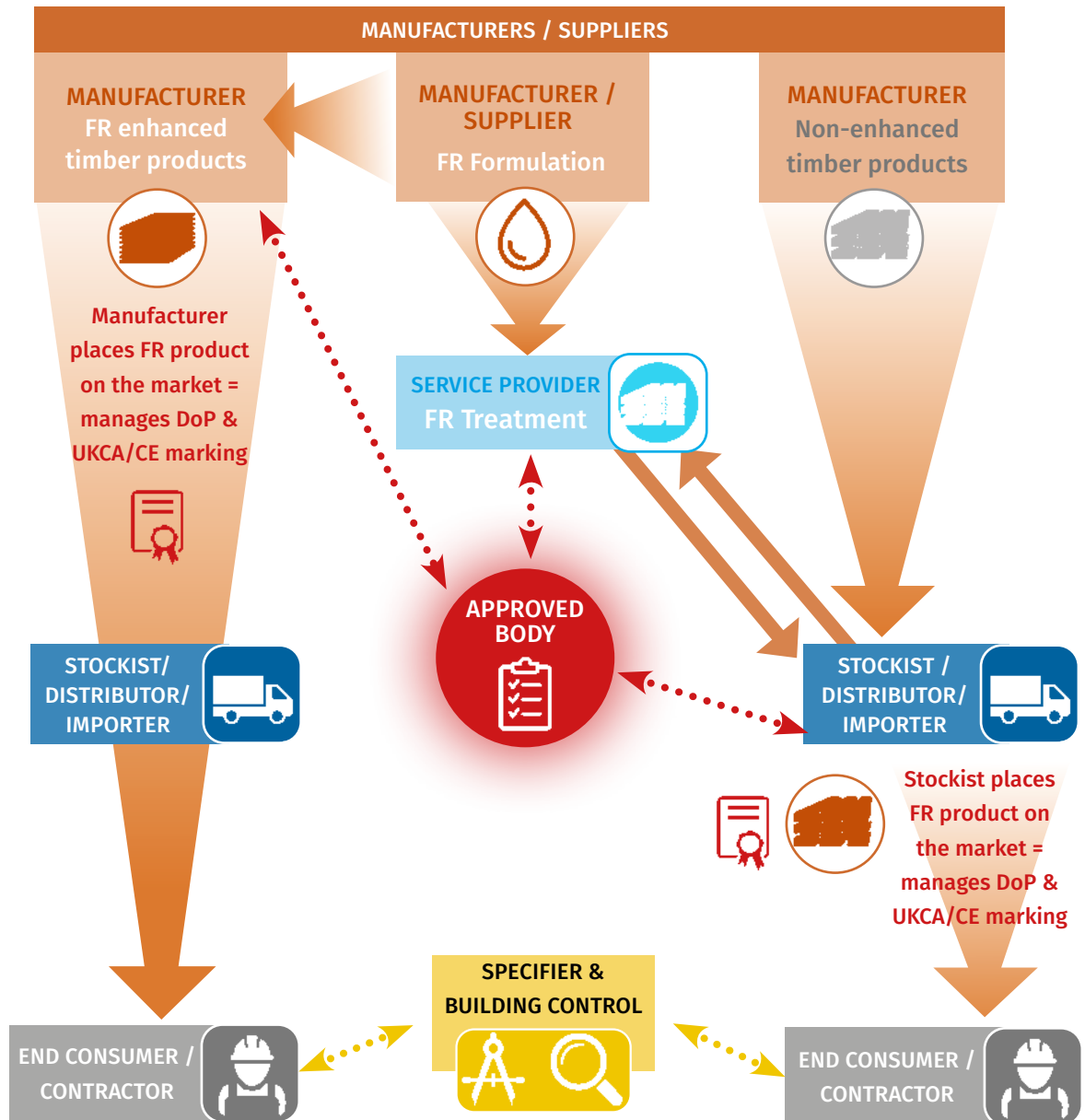
The pressure impregnation of wood panel products marked for '**structural use**', is likely to sufficiently alter the structural integrity of those materials and so invalidate the information on the original DoP. If the treated boards are not subsequently re-tested, then that material must be reclassified as '**non-structural**'.

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It is the responsibility of those placing FR treated products on the market to replace any existing UKCA or CE mark on the product to reflect the change in status and issue a new DoP which reflects the improved 'reaction to fire' class claim being made. This will normally be the owner/distributor of the product as the treater cannot do this when the material never becomes their property.

For further guidance on accurate specification, effective chain of custody and CPR compliance, please see *Guidance Notes WPA FR4, FR6 and FR9.*

The FR Treated Wood Supply Chain:



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For further information or advice, please contact either :

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