



GUIDANCE NOTE

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Ensuring Effective Traceability

The Flame Retardant Treated Wood Supply Chain

This Guidance Note is for those who intend to place flame retardant (FR) treated wood-based products on the market, to assist them in meeting their legal obligations under the Construction Products Regulation (CPR) and help ensure that those products will perform as declared. See *Guidance Note WPA FR 4* for more information on CPR requirements.

Flame retardants can be added to sheet materials (MDF, OSB, Plywood) at the time of manufacture. However, this document addresses the more complex situation where distributors/owners of non-FR stock send material to a third-party service company for FR treatment before selling that treated stock on into the open market.

Establishing Product Performance

The 'reaction to fire' performance of all flame-retardant enhanced wood products must be tested and classified by a **notified body**. See *Guidance Notes WPA FR 2, 3 & 7* for full details. The notified body will issue a '**fire test classification report**' which defines how the product will perform. **WPA FR 7** explains how to interpret these reports. A classification report is the only definitive document that provides this important information. They contain the product description, the reaction to fire classification and the field of application which are the foundation of DoP claims, making these reports the key reference point throughout the supply chain.

Certificated Factory Production Control

Where **distributors/owners** of non-FR stock send material to a **service treater** for factory treatment before selling that stock on, the distributor takes on the responsibilities of the **manufacturer**. The distributor is the first person placing the product on the market and so must take responsibility for the DoP. The FR service treater does not own the material but is acting as a specialist sub-contractor to help create the treated product and in some cases providing the fire test classification report on which the DoP is based, so that the distributor can place it on the open market.

Responsibilities of the Importer/Owner/Distributor

- Identify a treater capable of imparting the desired enhancement of the reaction to fire performance to the product under consideration.
- Obtain a copy of the treater's FPC certificate and establish that the product under consideration lies within its scope.
- Review the treater's classification report(s) to ensure that the product description, the reaction to fire classification and the field of application meets the end user/customers' requirements.
- Provide the service treater with a clear, unambiguous and accurate product description
- Ensure that the material sent for treatment matches the intended Classification report

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In addition, to assist compliance -

1. Create an FPC process within the distribution warehouse that establishes identity, traceability and control of the finished product following return from the treater (*See later paragraph on FPC for the distributor*).
2. Appoint an appropriate **approved body** (UK) or **notified body** (EU) and submit the FPC process for inspection and certification (*it is normally appropriate for the treater and distributor to appoint the same approved/notified body*).
3. Create a declaration of performance for the finished product that meets the requirements of the CPR, Annex III and establish the UKCA (UK) or CE (EU) mark.

Factory Production Control by the Distributor

While technically not a factory, the distributor's warehousing operation must be controlled adequately to ensure consistent identity and traceability of the treated product. Consequently, the distributor might consider the following points for inclusion in the FPC process:

1. Establishing unique identification codes for each treated item by description.
2. Maintaining a formal works order process for commissioning treatment of batches
3. Maintaining accurate stock control of untreated and treated product.
4. Defining formal processes for product inspection, goods received, control of non-conforming product, order picking and handling of complaints.
5. Training and competence of the staff involved, including records of training.
6. Archiving and retrieval of treatment certificates against specific batch references.
7. Draw up and control the declaration of performance and the UKCA or CE mark.

Responsibilities of the FR Service Treater

- Check product species (*where practical visually, otherwise on documentation*), minimum thickness, density and MC on receipt of goods for treatment. Also check against description supplied by material owner and on fire classification report.
- Product description needs to match that on Fire test classification report and be consistent with the description to the end user/marketplace.
- If descriptions are not essentially the same, this should be raised with supplier and material should not be treated.

In addition, to assist compliance -

1. Operate a treatment process that is capable of achieving the enhanced performance classification for one or more specified substrate(s). See *Guidance Note WPA FR 10* for how this can be verified and demonstrated.
2. Apply an approved flame retardant formulation in a plant that is maintained and controlled so as to impart the required enhancement to the substrate consistently.
3. Submit the FR formulation, application plant and the FPC process to an approved or notified body for inspection and certification.
4. Submit to continuing surveillance, assessment and evaluation by the approved or notified body.

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