



Levelling Up, Housing and Communities Committee

Dr Scott Steedman
Director of Standards
British Standards Institution
389 Chiswick High Road
London, W4 4AL

27 April 2022

Dear Scott,

PAS 9980:2022, Fire risk appraisal of external wall construction and cladding of existing blocks of flats – Code of practice

I am writing further to a concern which has been raised with the Committee about PAS9980, which assesses whether or not fire safety remediation is required on a building's external façades, and which replaced DLUHC's Consolidated Advice Note.

The concern is that the standard accepts far too high a level of risk from combustible materials.

We have been told that PAS9980 deems products with an extremely high calorific fuel load as "risk neutral". This is illustrated by coal, a combustible fuel, having a calorific value theoretically permitted by PAS9980. Under PAS9980, products with a calorific value of ≤ 35 MJ/kg are within the "risk neutral" threshold. Coal has a calorific value of 27 - 33MJ/kg.

As a result, a number of products such as Phenolic plastic foam insulation, PUR plastic foam insulation, PIR plastic foam insulation, and Euroclass D-rated HPL panels are all deemed to be risk neutral products under PAS9980.

As such, it has been asserted to the Committee that the PAS9980 system of classification appears to focus on the dangers of ACM cladding whilst overlooking other highly combustible products.

It would be appreciated if, in reply to this letter, you could address the concern that has been raised.

Best wishes,

Clive Betts MP
Chair, Levelling Up, Housing and Communities Committee