

# TECHNICAL BULLETIN

## UKCA MARKING

- Overview of the move from the EU Construction Products Regulation (EU CPR) to the UK CPR
- What the changes mean for conformity assessment of construction products
- Roles of economic operators

After 47 years of membership, the UK left the EU on 31 January 2020. There followed a transition period during which the UK continued to participate in the EU Customs Union and the European single market. A Trade and Cooperation Agreement was negotiated so the transition period ended at 11pm on 31 December 2020 with a deal called the EU-UK Withdrawal Agreement.

For the UK construction industry, the obligation to comply with the EU Construction Products Regulation (EU CPR) ended with the termination of the transition period and a new regulatory framework applies for construction products from 1 Jan 2021. This framework retains most of the characteristics of the EU CPR, but is complex in the way requirements vary between Great Britain, Northern Ireland and countries within the European single market.

This bulletin summarises the key points that the construction industry must be aware of throughout 2021 and 2022. Some gaps still exist and guidance may change.

### Intended for:

- Those who already have a general understanding of CE marking
- Those working with construction products (many other types of product carry CE marking and have their own rules and guidance – both from UK Government websites and industry associations)
- Manufacturers of construction products
- Authorised representatives
- Importers of construction products
- Conformity Assessment Bodies in the UK and the European single market

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- Summary of the EU CPR (including harmonised standards and European Assessment Documents)
- Summary of the UK CPR (including 2019 and 2020 Amendments)
- Manufacturer obligations (including dual marking, third country status and conformity)
- Authorised representative obligations
- Importer obligations
- The risk of divergence in the regulation of construction products
- Annex A – a list of EU tertiary legislation adopted by the UK CPR.

## The EU Construction Products Regulation (EU CPR)

The EU CPR is concerned with placing products on the market rather than creating building regulations. Although dated 2011, it came into force in July 2013 with the principal aim of breaking down technical barriers to trade in construction products within the European single market by various harmonisation measures. The EU CPR:

- Established harmonised rules for marketing construction products, so that the performance of products from different manufacturers and countries could be compared.
- Enabled the free circulation of construction products within the European single market so that products only required a single assessment.
- Made provision for Notified Bodies and Technical Assessment Bodies for testing and certification.
- Obligated manufacturers to assess products that fell within the scope of a harmonised standard (hEN), to issue a Declaration of Performance (DoP) for these products and to affix the CE marking. Where no hEN exists the EU CPR provided for a similar voluntary assessment against a European Assessment Document (EAD), allowing manufacturers to issue a DoP and affix the CE marking to a wider range of products.

The hEN and the EAD are the only types of harmonised technical specification recognised by the EU CPR. Each hEN or EAD gains legal status by citation in the Official Journal of the European Union (OJEU), whereby the citation is for a dated version of the specification. Any assessment must be in accordance with the cited version, even if a more recent version is published.

The DoP is an undertaking by the manufacturer that the product fulfils the stated performance characteristics, whereby only characteristics that are defined in the hEN or EAD may be declared. The CE marking accompanies the product and contains similar performance statements, but relies on the DoP for its validity. Any assumptions about product safety or quality should rely on the detail of the declared characteristics rather than the simple presence of CE marking.

## Harmonised standards (hENs)

hENs are prepared by standards committees convened by the European Committee for Standardization (CEN) and published by the standards bodies of the individual countries, such as the British Standards Institution in the UK. If CEN completes the approval of a standard, which necessitates a high degree of consensus among participating countries, the national standards bodies have an obligation to publish it.

However, the European Commission does not have an obligation to cite the standard in the OJEU, and in recent years has generally refused to do so, claiming that the standards lack legal certainty in the way they are written. Standards committees have found it impossible to provide amendments that satisfy the Commission and are concerned that technical improvements contained in the revised standards cannot be implemented.

As a consequence, the majority of construction product hENs cited in the OJEU are becoming obsolete and many have been superseded. This is a significant problem in the operation of the EU CPR since manufacturers and Notified Bodies throughout the EU find it hard to accept that they must continue to apply standards that they rightly regard as out of date.

## European Assessment Documents (EADs)

EADs are prepared by the European Organisation for Technical Assessment (EOTA), which is the membership organisation for all Technical Assessment Bodies (TABs). EADs face similar difficulties to hENs to become cited in the OJEU, but to a lesser extent since their format and content is tightly controlled. EADs are prepared by a working group of interested TABs in response to a request from industry.

Manufacturers wishing to make a DoP for a product covered by an existing EAD, and affix CE marking to it, must first have the product assessed by a TAB in accordance with the EAD. The TAB will compile a European Technical Assessment (ETA) that is specific to the product, then a Notified Body can conduct the relevant activities in accordance with that ETA and issue a certificate for CE marking.

## The UK Construction Products Regulations (UK CPR)

In 2019, as part of the UK Government's preparations for leaving the EU, a new Statutory Instrument SI 2019 No. 465<sup>1</sup> (the 2019 Amendment) was passed combining several pieces of existing legislation for Construction Products. These were:

- Regulation (EU) No. 305/2011 – the EU CPR.
- SI 2013 1387 – UK CPR 2013; these are the UK regulations that came into force with the EU CPR and made provision for its enforcement.
- Tertiary legislation originating in the EU, which was amended or, in a few cases, repealed. The amendments substituted references to the UK for references to the EU, rather than making technical alterations.

The list of tertiary legislation included in the 2019 Amendment is extensive (see Annex A), but the legislation provides the legal basis for many assumptions made for construction products. In particular, the legislation establishes the reaction-to-fire classification of construction products and sets the system of assessment and verification of constancy of performance, commonly referred to as the Attestation and Verification of Constancy of Performance (AVCP) system or AVCP level,<sup>\*</sup> that must be applied for each product type. Standards committees and bodies involved in testing and certification may not change these assumptions.

The principal objective of the 2019 Amendment was to retain the EU CPR with as few changes as possible after the UK left the EU. In particular, the Amendment introduced UKCA marking (UK Conformity Assessment) to replace CE marking and provided for UK-based Approved Bodies to fulfil the tasks of EU Notified Bodies.



Figure 1: UKCA mark

<sup>\*</sup> Much of the tertiary legislation pre-dates the EU CPR and uses the now obsolete term 'system of attestation of conformity'. The allocation of tasks within the systems has not changed.

Negotiation of the Trade and Cooperation Agreement in 2020 led to a special status for Northern Ireland, enshrined in the Northern Ireland Protocol, so a further Amendment, SI 2020 No. 1359 (the 2020 Amendment), was necessary before the 2019 Amendment came into force. The 2020 Amendment ensures that the EU CPR continues to apply in Northern Ireland and restricts the 2019 Amendment to Great Britain only (England, Scotland and Wales). Therefore, construction products that are CE marked can continue to be placed on the market in Northern Ireland.

However, if that CE mark is based on an assessment by a body based in the UK (including Northern Ireland) it must be accompanied by a UK(NI) indication (i.e. CE+UK(NI) marking) since the assessment is not accepted outside the UK. Similarly, UKCA marking is not accepted in Northern Ireland and 'CE+UK(NI)' marking is not accepted in GB for goods that originate in GB.

Within the NI Protocol the UK Government has undertaken to provide qualifying Northern Ireland goods unfettered access to the GB market, so these goods should be accepted in GB irrespective of their marking.



Figure 2: UK(NI) mark

Neither Amendment is a consolidated text, so it is still necessary to refer to the original legislation for its substance. The 2019 Amendment is helpful in that it has hyperlinks to all the pieces of legislation that it cites.

## The changes

The Amendments came into force on 1 January 2021. The most important changes are shown in *Table 1*, whereby it is clear that the structure of the EU CPR is retained in its entirety.

The change in applicability of conformity marking by market is shown in *Table 2* for the period 2020–22. Transitional arrangements allow CE-marked goods that meet EU requirements to be placed on the Great Britain (GB) market until 1 January 2023, but there is no reciprocal arrangement for UK-assessed products to be placed on the EU single market during 2021 or 2022.

The UK Government has legislated to provide a definition of qualifying Northern Ireland goods (SI 2020 1454<sup>2</sup>) that will enjoy unfettered market access to the GB market. The definition includes any domestic goods that have undergone processing operation in NI only and which are not under any kind of customs restrictions.

Until 1 January 2023, products that meet Northern Ireland's requirements and are appropriately marked (i.e. CE marking with or without UK(NI) indication) can be placed on the entire UK market irrespective of whether they are qualifying Northern Ireland goods.

**Table 1: Summary of changes from the EU CPR to the UK CPR**

	EU CPR	UK CPR	UK CPR
Legislator	European Commission	Secretary of State	Secretary of State
Territory where it is applied	EU member states, other European Economic Area (EEA) members and Switzerland	Great Britain (England, Scotland and Wales)	Northern Ireland
Bodies undertaking work	Notified body	Approved body	Approved body acting as a notified body
	Technical Assessment Body (TAB)	Technical Assessment Body (TAB) – UK	Technical Assessment Body (TAB) – UK
Technical specifications	Harmonised standard	Designated standard	Harmonised standard
	European Assessment Document (EAD)	UK Assessment Document (UKAD)	European Assessment Document (EAD)
Supporting documents	Declaration of performance (EU)	Declaration of performance (GB)	Declaration of Performance (NI)
	European Technical Assessment (ETA)	UK Technical Assessment (UKTA)	European Technical Assessment (ETA)
Markings	CE marking	UKCA marking	CE+UK(NI) marking

**Table 2: Conformity marking by market, 2020–23**

	2020			2021–22			2023		
	CE	UK CA	CE UK NI	CE	UK CA	CE UK NI	CE	UK CA	CE UK NI
Great Britain (England, Scotland and Wales)	✓	N/A	N/A	✓	✓	✓	✗	✓	✗ <sup>1</sup>
Northern Ireland	✓	N/A	N/A	✓	✗	✓	✓	✗	✓
EU single market (EU27 countries, other EEA countries and Switzerland)	✓	N/A	N/A	✓	✗	✗	✓	✗	✗

<sup>1</sup> Except for 'qualifying Northern Ireland goods' under 'unfettered access' rules

## Manufacturer obligations

The obligation on manufacturers to make a DoP and affix a mark on their product is unchanged. However, they must now decide in which markets they wish to place their products: the EU single market, Great Britain or Northern Ireland.

### Dual marking

Dual marking is not prohibited, so a product can be placed on any one of these markets providing the relevant mark is affixed. The exception is the combination of CE marking with CE+UK(NI) marking since the two instances of 'CE' make conflicting claims of conformity.

Each marking will require its own DoP, AVCP certificate or Assessment of Performance (as applicable) and supporting documentation.

### Third country status

From 1 January 2021, manufacturers based in Great Britain are in a third country with respect to the European single market and Northern Ireland. Conversely, manufacturers in the European single market are in a third country with respect to Great Britain, although the requirements for marking only apply from 1 January 2023. Manufacturers in Northern Ireland are effectively in the European single market, but also enjoy unfettered access to Great Britain, which implies they are not subject to third country manufacturer obligations in either of these markets.

Once a manufacturer has established whether or not it is in a third country, its obligations are essentially unchanged to those in 2020. If the product falls within the scope of a designated standard or a harmonised standard, the manufacturer must:

- ensure all the necessary assessment tasks are completed in accordance with the system of attestation of conformity specified for the product
- compile the required technical documentation, make a DoP available and affix the conformity marking to the product
- establish and maintain a factory production control system.

### Conformity

Depending on the AVCP system for the product, the manufacturer may need to appoint a Conformity Assessment Body (CAB), which is a Notified Body for the European single

market or an Approved Body for the UK market. The CAB may be designated as a testing body or a certification body.

The UK Government has published a list of designated standards that is the same as the OJEU list of harmonised standards. This provides a basis for UK Approved Bodies to carry out their tasks.

If the product falls within the scope of an EAD, and the manufacturer wishes to affix CE marking for the EU single market, it must first arrange for an ETA to be issued, then complete the same tasks as for a harmonised standard. For the GB market, the UK Government has recently adopted a list of pre-Brexit EADs that can be used to produce Technical Assessments (UKTA) as a basis for UKCA marking. The cited EADs are those that were current in the EU immediately before 31 December 2020, which includes some European Technical Assessment Guidelines (ETAG) that could be used as EADs at that point in time, but excludes any new or revised EADs that have been adopted in the EU since.

There are several systems of AVCP for the attestation of conformity that are summarised in *Table 3*. The requirements for CAB involvement at each system are common to both the European single market and the UK market, but there is no mutual recognition of the CABs. The European Commission has withdrawn recognition of UK CABs with effect from 1 January 2021 and the UK is likely to reciprocate on 1 January 2023.

For AVCP 1, the test laboratory should be International Laboratory Accreditation Cooperation (ILAC) accredited to BS EN ISO/IEC 17025:2017,<sup>3</sup> but the responsible CAB is a certification body. The laboratory should also meet the independence requirements of Article 43 of the CPR; using laboratories that are Notified or Approved Bodies ensures this is met. This implies that Notified Certification Bodies in the EU may continue to choose to accept test evidence from accredited laboratories based in the UK. UK Approved Certification Bodies working at AVCP 1 are similarly entitled to accept test evidence from laboratories based outside the UK to support UKCA marking.

For AVCP 3, the Commission has decided not only that future AVCP 3 test evidence is not accepted, but has retrospectively withdrawn the recognition of historic AVCP 3 test evidence from UK-based laboratories. This is of concern to manufacturers placing products on the European single market that have hitherto relied on this evidence for their DoPs. The UK will accept AVCP 3 test evidence from EU-based laboratories to support CE marking until 31 December 2022, but based on current understanding requires evidence from UK-approved laboratories for UKCA marking from 1 January 2023, which may give rise to further concerns for manufacturers supplying the UK market.

**Table 3: Summary of AVCP systems applicable to both the EU CPR to the UK CPR**

AVCP system	CAB involvement (a UK Approved Body or an EU Notified Body)	Examples of wood-based product types
AVCP 4	None	Low risk to structural safety, for example floor coverings, external cladding
AVCP 3	New products need test evidence from a CAB that is a testing laboratory with the relevant technical specification in its scope. The CAB provides an Assessment of Performance but does not certify the product	Aspects of fire performance for many products Dowel-type fasteners for structural use in timber
AVCP 2+	The CAB is a certification body with the product technical specification within its scope. It conducts continuing surveillance visits of the manufacturing facility to verify that the product complies with the technical documentation	Most structural products, including strength-graded timber, wood-based panels and trussed rafters
AVCP 1	Same as AVCP 2+, but the CAB certification body must also conduct sampling for testing new products and agree the choice of test laboratory	Aspects of fire performance for many products (for example, fire retardant treatment of external cladding). Products relying on adhesive bonds for structural integrity, such as glued laminated timber and finger-jointed timber
AVCP 1+	Same as AVCP 1, but the CAB certification body also conducts audit tests	Products with a high safety risk in their manufacturing process, such as some concrete-based structural products

## Authorised representative obligations

An authorised representative is mandated by the manufacturer to act on its behalf within the European Single market or the UK market. The representative must be established within the territory of the market where it is acting, irrespective of where the manufacturer is based. There is no obligation on the manufacturer to mandate a representative, but it may be useful for third country manufacturers.

The authorised representative must carry out the obligations in the mandate, which as a minimum include obligations to respond to requests for information from national authorities and to cooperate with national authorities to eliminate risks. The representative may be mandated to place the conformity mark on the product, but the manufacturer may not delegate its obligation to draw up technical documentation. The manufacturer must include the contact details of any authorised representatives in the DoP for the product.

## Importer obligations

Many distributors in the UK market and the European single market may become importers as a consequence of Brexit. As with authorised representatives, importers must be established within the territory of the market where they

operate. Importers have greater obligations than distributors since they are bringing the product into the market for the first time and must ensure it is compliant. Their obligations may be summarised as follows:

- ensure the conformity assessment has been carried out and that the manufacturer has drawn up the technical documentation and the DoP
- ensure that the product is marked correctly for the market
- provide their contact details with the product
- check the instructions are in a language easily understood by consumers
- keep registers of complaints and recalls, and conduct checks on the product if warranted
- inform market surveillance authorities (Trading Standards in the UK) if they realise the product is non-compliant
- provide information to market surveillance authorities on request
- keep records for at least ten years.

Many companies are well equipped to handle these obligations as they will previously have imported goods from outside the EU. However, some companies may look for guidance to industry associations and representatives.

## The risk of divergence in the regulation of construction products

The complexity of the marking requirements arising from creating three markets where previously only one existed masks the current complete alignment of the technical requirements for designated and harmonised standards. It is in the interest of manufacturers for this alignment to continue, as it is likely to reduce the cost of compliance for those that operate in more than one market.

However, there are many reasons to assume that divergence will occur. For instance, the UK may decide to cite current published standards as designated standards rather than persist with the same versions as the EU, or the current review of the EU CPR by the Commission may lead to a revision that the UK does not wish to adopt. Divergence already exists in that EADs adopted in the EU since 1 January 2021 are not cited for UKCA marking. It remains to be seen whether UK TABs will produce new UK Assessment Documents that align with the EADs published by the EOTA since the EU exit date.

Furthermore, the UK Government has recently announced the establishment of a Regulator for construction products, explicitly driven by evidence from the Grenfell Tower Inquiry. The announcement states: 'Businesses must ensure that their products are safe before being sold in addition to testing products against safety standards.' Although few details are yet available, the announcement implies that the UK Government is already looking beyond the current UK CPR.

While every effort is made to ensure the accuracy of the advice given, the company cannot accept liability for loss or damage arising from the information supplied.

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2. STATUTORY INSTRUMENTS 2020 No. 1454 The Definition of Qualifying Northern Ireland Goods (EU Exit) Regulations 2020
3. BS EN ISO/IEC 17025:2017 General requirements for the competence of testing and calibration laboratories

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## Annex A

List of EU tertiary legislation included in the 2019 Amendment to the UK Building Regulations

### Commission decisions on attesting conformity (setting the applicable AVCP system)

Decision	Product type
95/467/EC	Flues, gypsum products and structural bearings
96/577/EC	Fixed fire-fighting systems
96/578/EC	Sanitary appliances
96/579/EC	Circulation fixtures
96/580/EC	Curtain walling
96/582/EC	Structural sealant glazing systems and metal anchors for concrete
97/161/EC	Metal anchors for use in concrete for fixing lightweight systems
97/176/EC	Structural timber products and ancillaries
97/177/EC	Metal injection anchors for use in masonry
97/462/EC	Wood-based panels
97/463/EC	Plastic anchors for use in concrete and masonry
97/555/EC	Cements, building limes and other hydraulic binders
97/556/EC	External thermal insulation composite systems/kits with rendering
97/597/EC	Reinforcing and pre-stressing steel for concrete
97/638/EC	Fasteners for structural timber
97/740/EC	Masonry and related products
97/808/EC	Floorings
98/143/EC	Systems of mechanically fastened flexible roof waterproofing membranes
98/213/EC	Internal partition kits
98/214/EC	Structural metallic products and ancillaries
98/279/EC	Non-loadbearing permanent shuttering kits/systems based on hollow blocks or panels of insulating materials and, sometimes, concrete
98/436/EC	Roof coverings, rooflights, roof windows and ancillary products
98/437/EC	Internal and external wall and ceiling finishes

98/456/EC	Post-tensioning kits for the pre-stressing of structures
98/598/EC	Aggregates
98/599/EC	Liquid applied roof waterproofing kits
98/600/EC	Self-supporting translucent roof kits (except glass-based kits)
98/601/EC	Road construction products
1999/ 89/EC	Prefabricated stair kits
1999/90/EC	Membranes
1999/91/EC	Thermal insulating products
1999/92/EC	Light composite wood-based beams and columns
1999/93/EC	Doors, windows, shutters, blinds, gates and related building hardware
1999/94/EC	Precast normal/lightweight/autoclaved aerated concrete products
1999/454/EC	Fire stopping, fire sealing and fire protective products
1999/455/EC	Timber frame and log prefabricated building kits
1999/469/EC	Products related to concrete, mortar and grout
1999/470/EC	Construction adhesives
1999/471/EC	Space heating appliances
1999/472/EC	Pipes, tanks and ancillaries not in contact with water intended for human consumption
2000/245/EC	Flat glass, profiled glass and glass block products
2000/273/EC	Seven products for ETAs without Guideline
2000/447/EC	Prefabricated wood-based loadbearing stressed skin panels and self-supporting composite lightweight panels
2000/606/EC	Six products for ETAs without Guideline
2001/19/EC	Expansion joints for road bridges
2001/308/EC	Ventures
2002/359/EC	Construction products in contact with water intended for human consumption
2003/639/EC	Pins for structural joints
2003/640/EC	Kits for exterior wall claddings
2003/655/EC	Watertight covering kits for wetroom floors and walls
2003/656/EC	Seven products for ETAs without Guideline
2003/722/EC	Liquid-applied bridge deck waterproofing kits

2003/728/EC	Metal frame building kits, concrete frame building kits, prefabricated building units, cold storage room kits and rock-fall protection kits
2005/484/EC	Cold storage building kits and cold storage building envelope kits
2011/19/EU	Sealants for non-structural use in joints in buildings and pedestrian walkways
2011/284/EU	Power, control and communication cables

#### Commission decisions on classes of performance (fire classifications)

Decision	Performance class
2005/403/EC	Classes of external fire performance of roofs and roof coverings - coated steel roof sheets either as a single layer or as a system
2005/610/EC	Classes of reaction-to-fire performance - laminate and resilient floor coverings
2003/43/EC	Classes of reaction-to-fire performance - wood based panels, gypsum plasterboards, high-pressure decorative laminate panels and structural timber
2006/213/EC	Classes of reaction-to-fire performance - wood flooring and solid wood panelling and cladding
2006/600/EC	Classes of reaction-to-fire performance double skin metal faced sandwich panels for roofs
2010/81/EU	Classes of reaction-to-fire performance - adhesives for ceramic tiles
2010/82/EU	Classes of reaction-to-fire performance - decorative wallcoverings in roll and panel form
2010/83/EU	Classes of reaction-to-fire performance air drying jointing compounds
2010/85/EU	Classes of reaction-to-fire performance - cementitious screeds, calcium sulphate screeds and synthetic resin floor screeds
2010/737/EU	Classes of reaction-to-fire performance - steel sheets with polyester coating and with plastisol coating
2010/738/EU	Classes of reaction-to-fire performance - fibrous gypsum plaster casts

#### Commission implementing regulation

Regulation	Subject
1062/2013	Format of ETAs for construction products

#### Commission delegated regulations (mainly fire classifications)

Regulation	Subject
157/2014	Making a declaration of performance on construction products available on a website
1291/2014	Fire protection classification, without testing, of wood-based panels and solid wood panelling and cladding, when used for wall and ceiling covering
1292/2014	Reaction to fire classification, without testing, of certain uncoated wood floorings
1293/2014	Reaction to fire classification, without testing, of metal lath and beads for internal plastering, metal lath and beads for external rendering and metal beads and feature profiles
2016/364	Reaction to fire classification of the performance of construction products (Defines the classes and test methods)
2017/959	Horizontal settlement and short-term water absorption classification for in situ formed loose fill cellulose (LFCI) thermal insulation
2017/1228	Reaction to fire classification, without testing, of external renders and internal plasters based on organic binders and rendering and plastering mortars
2017/1475	Frost resistance classification of clay tiles
2017/2293	Reaction to fire classification, without testing, of cross laminated timber and laminated veneer lumber products
2017/1227	Reaction to fire classification, without testing, of glued laminated timber and structural finger jointed solid timber products