



The Fibreoptic Industry Association

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9th October 2017

For the attention of:
Chris Brown, Secretary TCT/7/2
BSI
389 Chiswick High Road
London
W4 4AL

SUBJECT: THE PUBLICATION OF BS 6701 AMENDMENT 1:2017

The Fibreoptic Industry Association was hoping that the combined impact of the extension of the Construction Products Regulation to power, communications and control cables (1st July 2017) and the revision of BS 7671 (Requirements for Electrical Installations: IET Wiring Regulations) to create its 18th Edition for publication in 2018 would lead to a simplified and corrected approach to fire safety requirements, in particular:

- the removal of text in the current BS 7671 allowing cables in escape routes to have no specified reaction to fire performance (in relation to flame spread and smoke production and obscuration) provided that the cables are installed in cable management systems that are designated non-“flame propagating” - even though that designation does in reality mean that they do propagate flame);
- the misuse of standards in the BS EN 60332 series which, while defining fire performance test methods, do not contain normative limits for the parameters measured;
- the replacement of all the current reaction to fire performance standards with EuroClass designations in accordance with article 8.3 of the Construction Products Regulation.

The Fibreoptic Industry Association were not pleased to see that the Draft for Public Comment (DPC) of the revised BS 7671¹ showed only, at best, a partial implementation of the above but were satisfied with its allowance for an amendment of BS 6701 to address these matters for the telecommunications cable arena.

The legal requirement for the assessment of fire safety in buildings is fully understood by the Fibreoptic Industry Association and we recognise that implementation standards are not the vehicle for legislation. However, we firmly believe that standards such as BS 7671 and BS 6701 should serve as a foundation for good practice and should be clear, concise and, above all, technically accurate.

The content of BS 6701 Amendment 1² (BS 6701 A1) which has been circulated and approved by due process is an example of such content and the Fibreoptic Industry Association is happy with its planned publication date in October 2017. The Fibreoptic Industry Association has been briefing its members on the likely outcome of this document since June 2015 and the market for telecommunications cables has reacted, for the most part, in accordance with the regime established under the Construction Products Regulation.

At the same time we were keen to support the correction of the text of the DPC BS 7671 via the comments of TCT/7/2 (submitted by Rob Cardigan). We now note in an interim resolution of comments³ that not only were these comments rejected but the proposed resolution of comments from

¹ JPEL_64_17_0134

² TCT_7_2_1_17_0002

³ TCT_7_2_17_0036

the representative of the British Cables Association, has led to a re-instatement of existing text together with a note simply mentioning the Construction Products Regulation as a matter of information only.

Obviously such a blatant disregard for fire safety in general and the Construction Products Regulation in particular is a matter for Technical Committee JPEL/64 to address but it is difficult to understand how BSI can countenance such decisions.

In the meantime, having removed the pointer to BS 6701 for telecommunications cables from the revised text of BS 7671, it appears that the British Cables Association wish to interfere in the publication of the BS 6701 A1, outside the normal comment phase, by requesting a deferment of its implementation and introducing technical issues at a very late stage - which would naturally have the same result - despite those comments having been rejected by the panel producing the BS 6701 A1 during the conventional commenting process.

In the current climate it is important for standards bodies and trade associations to be “doing the right thing” in relation to fire safety and the Construction Products Regulation. The Fibreoptic Industry Association fully supports the content of BS 6701 A1 as being an example of the telecommunications industry “doing the right thing”.

The apparent reluctance of the power cable market as represented by the British Cables Association to implement article 8.3 of the Construction Products Regulation and, even more importantly, to address correctly the approach to cabling in escape routes in terms of smoke production and flame spread is the antithesis of “doing the right thing”.

The Fibreoptic Industry Association therefore cannot support any of the recent proposals made by the British Cables Association in relation to BS 6701 A1 and request imminent publication in the form in which it was circulated for final approval. In an ideal world, BS 6701 A1 should have been published on 1st July 2017 and further delays could attract negative publicity from any investigations resulting from fire events that occurred between 1st July and the actual publication date.

We also suggest that BSI initiates a formal review of the planned content of BS 7671 to ensure that objectives outlined in the opening paragraph of this letter are met in full.

Yours sincerely,

Mike Gilmore
Director, **STANDARDS@fia**

Chairman BSI TCT/7/1
Chairman CLC TC215, Convenor WG1 and Secretary WG2

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