

Customer Briefing:

Regulatory Changes & the Publication of the
BCF Code of Practice for the Repainting of
Existing Communal Buildings

June 2026

We strongly encourage all parties operating in the decorative category to seek independent advice on matters as critical as fire safety.

At AkzoNobel, we strive to comply with all relevant national and international legislation and to uphold the highest standards within the UK decorative coatings industry.

We believe that we can support one another in meeting both the clear intent and the spirit of the regulations which are designed to protect decorated environments and the safety of everyone.

We are aware of some apparent market confusion relating to recent changes to Building Regulations. We are providing the enclosed information to assist you in navigating this changing regulatory landscape.

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1. Context

In the changes to Building Regulations that came into effect in March 2025 references to the National classifications (BS 476 parts 6 & 7) for Reaction to Fire were removed from Approved Document B (including from the transposition table).

The EN standard (BS EN 13501-1) is now the only relevant classification standard for Reaction to Fire in Approved Document B.

Our Response:

- ✓ Stopped referring to BS 476 parts 6 & 7 and archived our product certifications & literature referencing this
- ✓ Dulux Trade products are now tested and certified to EN 13501-1
- ✓ Delisted our Dulux Trade Pyroshield range
- ✓ Updated technical documentation and labelling accordingly

In the Market

We are aware of some apparent market confusion relating to these changes to Building Regulations – particularly with regard to the repainting of existing buildings.

The British Coatings Federation have published a Code of Practice for the Repainting of Existing Communal Buildings to provide clarity for decorative paints in this important area of fire safety.

2. Key Points

The British Coatings Federation (BCF) has published a Code of Practice for the Repainting of Existing Communal Buildings - an industry-wide initiative to provide clear guidance and clarification on the critical topic of fire safety and how this applies to the use of decorative paints.

- Both the British Coatings Federation and AkzoNobel have each obtained independent external legal advice to align on the content of the code. The Code has also been discussed with the UK's Building Safety Regulator, and their input informed the contents of the code.
 - The previously used British Standard BS 476 parts 6 & 7 and "Class 0" have been withdrawn. The European Standard EN 13501-1 is the only standard for Reaction to Fire Classifications that should be used, whether for new-build projects or in consideration as part of repainting/maintenance projects.
 - Reaction to Fire is used for classification of Wall and Ceiling Linings which is relevant for decorative paints. Reaction to Fire **should not** be conflated with Fire Resistance (dealing with ability to resist fire altogether). Fire Resistance can still be classified by the relevant British Standard within BS 476 until 2029.
- Legal responsibility as 'Responsible Persons' lies with a wide range of parties: property owners, managers, designers, and on-site contractors.
 - Paint manufacturers have a responsibility to provide clear and relevant technical documentation, including fire performance data that can be used by the Responsible Persons when carrying out a Risk Assessment.
 - Failure of a Responsible Person to carry out legally compliant works exposes them to legal liability whilst also creating health and safety risks to building occupiers and insurance risks to contractors and building owners.
 - We recommend all parties obtain appropriate independent advice, from the likes of the BCF Code of Practice for the Repainting of Existing Communal Buildings.

3. BCF Code of Practice for the Repainting of Existing Communal Buildings

Industry-wide initiative to provide clear guidance and clarification on the critical topic of fire safety and how this applies to the use of decorative paints

- **Input from:**
 - The Building Safety Regulator*
 - Paint manufacturers (via BCF Building Regulations Task Force)
 - Independent legal advice
 - Association of Specialist Fire Protection (ASFP)
 - Construction Products Association (CPA)
- Addresses and provides clarity on key aspects of fire safety that have been subject to apparent confusion in the market
- Published on the BCF website [G050 BCF Code of Practice fo.pdf](#)

*The Building Safety Regulator (BSR) is an executive non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government. BSR regulate higher-risk buildings and work to raise safety standards for England's buildings and improve built environment competence across England and Wales



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BCF Code of Practice for the re-painting of existing communal buildings, Version 1 25th February 2026

The British Coatings Federation (BCF) is the UK trade association representing manufacturers of decorative, industrial, and powder coatings, as well as printing inks and wallcoverings. This document has been developed by the BCF in collaboration with the BCF Building Regulations Task Force, with the majority of members endorsing its publication. The development of the Code of Practice was supported by legal advice and expert advice from the Association of Specialist Fire Protection (ASFP) and the Construction Products Association (CPA). The contents of the document was discussed with the Building Safety Regulator which informed the BCF's position for this Code of Practice.

Introduction

Multiple paint layers on an interior wall of a building can pose a fire risk. This is due to a build-up of paint acting as fuel in the event of a fire.

While there are clear fire performance requirements for interior walls (or linings) for new buildings in Approved Document B, unfortunately there appears to be a lack of clarity regarding the requirements for re-painting in existing buildings. The BCF consider that there is a need for advice on the requirements for repainting existing buildings (particularly in communal buildings and in communal areas of other buildings).

This issue is particularly acute because unlike other building materials which may be removed and directly replaced (e.g. a fire door), each additional layer of paint on a wall may in fact degrade the fire performance of the wall. This is especially concerning for circulation spaces/ communal areas/ escape routes in communal buildings, where fire safety is paramount.

It is therefore difficult to justify why stricter requirements apply to the painting of new buildings, while older buildings which are more likely to have undergone multiple refurbishments and have a build-up of paint layers are subject to less scrutiny, despite being potentially at higher risk.

All the parties involved in the supply and application of coating products have obligations under the Health and Safety at Work etc. Act 1974. This is particularly so in the case of contractors, where the overriding obligations are for the safety of employees and non-employees who are affected by their work activity. They also have obligations as Responsible Persons.

In the case of manufacturers and suppliers, sections 3 and 6 extend this to obligations to provide correct and relevant product information. This includes, but is not limited to, technical specifications, services, product data and safety data to inform applicators and

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February 2026

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4. Changes to Building Regulations

Timeline



02 MARCH 2025

- BS 476 Parts 6 and 7 (used for **Reaction to Fire** and “Class 0” ratings) were removed from Approved Document B in England.
- From this date, only EN 13501-1 should be used to demonstrate compliance for wall and ceiling linings, including decorative paints.

02 SEPTEMBER 2025

- The 6-month transition period for projects already in progress ended.
- BS 476 Parts 6 & 7 are now fully withdrawn and invalid.

02 SEPTEMBER 2029

- Remaining parts of BS 476 (Parts 20–24), relating to **Fire Resistance**, will be removed.
- These apply to protective coatings for structural elements such as beams, fire doors, and ventilation ducts (not wall and ceiling linings).

5. Changes to Building Regulations: Regional Differences



England:

EN 13501-1 is the only relevant classification standard for Reaction to Fire in Approved Document B

Scotland:

EN 13501-1 is the only relevant classification standard for Reaction to Fire in the Technical Handbook

Wales:

Both the EN Class (BS EN 13501-1) and The National Class (BS 476 parts 6 & 7) are currently still listed in Approved Document B

Northern Ireland:

Both the EN Class (BS EN 13501-1) and The National Class (BS 476 parts 6 & 7) are currently still listed in Technical Booklet E

AkzoNobel will only specify products classified to the more stringent European Standard EN 13501-1, whichever part of the UK a project is in.

6. Requirements for Repainting of Communal Areas

New Buildings

- Clear Reaction to Fire performance requirements for interior walls and ceiling linings in Approved Document B i.e. use of EN 13501-1
- In communal areas, circulation spaces, and escape routes a minimum classification of Euroclass B-s3,d2 on a relevant substrate should be achieved

Repainting of Existing Buildings

- Under the **Building Regulations 2010**, *any change that affects fire performance* is considered a **material alteration**, triggering compliance with **Schedule 1**, including **Part B (Fire Safety)**. This includes applying paints to wall and ceiling linings.
- This means that repainting must not worsen fire performance in high-risk areas like escape routes, including staircases.
- Coatings used for repainting or refurbishing communal areas, circulation spaces, and escape routes should be tested to **BS EN 13501-1** and should achieve a minimum classification of **Euroclass B-s3,d2**, on a relevant substrate. This is consistent with the requirements for new buildings and aligned with the principles of the RRFSo.

Legal Responsibility

- A wide range of parties: property owners, managers, designers, and on-site contractors are listed as Responsible Persons.
- Construction product manufacturers (including paint brands) are not listed as Responsible Persons.
- Use of non-compliant or outdated products may result in legal, insurance and reputational risks

7. Understanding Fire Classifications: Reaction to Fire vs Fire Resistance

It is essential to distinguish between two types of fire performance:

Reaction to Fire

- Measures how materials contribute to fire development (ignition, flame spread, heat release, smoke, flaming droplets).
- Relevant to decorative wall and ceiling paints and fire upgrade systems
- The National Classes (BS 476) for reaction to fire were removed from Approved Document B from 2nd March 2025 leaving only the EN standard (EN 13501-1)

Fire Resistance

- Assesses how well materials contain or resist fire, typically for structural elements e.g. intumescent coatings for structural steel.
- Not applicable to standard decorative paints.
- The National Classes (BS 476) for Fire Resistance will be removed from Approved Document B from 2nd September 2029

In Summary

Decorative paints fall under Reaction to Fire classifications, and the 2025 changes to Building Regulations are already in effect.

Decorative paints do not fall under Fire Resistance classifications, and the 2029 deadline is not relevant to them.

8. Concerns for Contractors and Building Owners

- Under the Building Regulations 2010, any change affecting fire performance is a material alteration. This means compliance with Schedule 1, including Part B (Fire Safety), is mandatory.
- Property owners, building managers, contractors, occupiers, designers, and other parties are responsible for ensuring compliance
- Construction product manufacturers (e.g. paint brands) are not listed as Responsible Persons.

Our Concern:

Misinformation may lead contractors and building owners to use non-compliant or outdated products, exposing themselves to:

- Legal and insurance risks
- Reputational damage
- Potential harm to building occupants



9. Addressing Misleading Claims

We are concerned by any claims by market stakeholders suggesting:

- BS 476 part 6 & 7 remain valid for any project including refurbishments
- Fire safety is governed solely by the Regulatory Reform (Fire Safety) Order 2005

These claims are incorrect

- While the RRFSO governs fire safety management in occupied buildings, it does not encompass all elements required for a fire safety assessment and does not override the Building Regulations 2010, which govern material performance and alterations.

The Hackitt Review

The Hackitt Review called for a radical overhaul of building safety, including:

- Clear accountability for manufacturers and duty holders
- Elimination of fragmented standards and “tick-box” compliance
- A shift to outcomes-based regulation and transparent product testing

The Grenfell Inquiry highlighted how confusion between standards and outdated regulations contributed to unsafe practices. Manufacturers must not repeat these mistakes.

At AkzoNobel, we are committed to supporting contractors and specifiers in upholding national and international legislation.

While independent advice should be sought for specific projects, we continue to provide clarity on compliance with this important responsibility.

To be clear: the use of historic terms or outdated, withdrawn classifications should be avoided.

10. AkzoNobel's Role in Safety Compliance

Legislation:

While paint manufacturers are not classified as "Responsible Persons" under the Regulatory Reform (Fire Safety) Order 2005 or the Fire Safety Act 2021, we, as product manufacturers and suppliers, have clear legal obligations under the likes of the:

- Construction Products Regulations 2013 (as amended)
- Health and Safety at Work Act etc. 1974
- General Product Safety and Consumer Protection regimes
- REACH
- CLP Regulation

Our Responsibilities include but are not limited to:

- Ensuring products are legally compliant and safe for their intended use
- Marketing products accurately, without exaggeration
- Providing clear and relevant technical documentation, including fire performance data
- Labelling products in line with CLP hazard communication standards
- Supplying safety data sheets and usage guidance that reflect current regulations
- Avoiding greenwashing by ensuring all environmental and safety claims are truthful, evidence-based, and compliant with advertising standards

AkzoNobel strongly oppose the use of outdated or misapplied standards in product promotion, especially where fire safety is concerned.

Our commitment is to transparency, regulatory integrity, and public safety.

11.Key Points Revisited

The British Coatings Federation (BCF) has published a Code of Practice for the Repainting of Existing Communal Buildings - an industry-wide initiative to provide clear guidance and clarification on the critical topic of fire safety and how this applies to the use of decorative paints.

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AkzoNobel's Commitment

AkzoNobel

We believe in doing the right thing when it comes to fire safety.

AkzoNobel is committed to:

- Clarity and transparency in product classification
- Compliance with current product safety regulations
- Supporting customers and specifiers in making informed, responsible choices

We remain available to support you in navigating these changes and ensuring your projects remain safe, compliant, and future-proof.

13. Appendix

Useful Links

BCF Code of Practice for the re-painting of existing communal buildings

- [G050 BCF Code of Practice fo.pdf](#)

Building Safety Regulator

- [Building Safety Regulator - GOV.UK](#)

Upcoming changes in Wales affecting Higher Risk Buildings:

- [The Building \(Higher-Risk Buildings Procedures\) \(Wales\) Regulations 2025 and related regulations \(WGC 002/2026\) \[HTML\] | GOV.WALES](#)
- [The Building etc. \(Amendment\) \(No. 2\) \(Wales\) Regulations 2025 and related regulation \(WGC 001/2026\) \[HTML\] | GOV.WALES](#)

England – Approved Document B:

- [Fire safety: Approved Document B - GOV.UK](#)

Scotland – Building Standards (including Technical Handbooks):

- [Building regulations - Building standards - gov.scot](#)

Wales – Approved Document B

- [Approved Document B: fire safety | GOV.WALES](#)

Northern Ireland – Technical Booklet E:

- [Technical booklet E | Department of Finance](#)

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