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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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building owners in the undertaking of their risk assessments of the appropriate works and / or building(s). In the case of Fire Safety this is product testing on an appropriate substrate according to EN 13501-1.

It is of course a matter for Responsible Persons, contractors and manufacturers, rather than the BCF, to make their own risk assessments in that regard. Nevertheless, advice in this area may be helpful to members.

The BCF intends to address this issue and help bridge this gap through this document.

Fire Safety Requirements for New Buildings

A number of amendments have recently been made to the Guidance in Approved Document B for the application of the Building Regulations in the light of findings of the Public Inquiry into the Grenfell Tower Fire. These include an amendment which reflects the process of withdrawal of British National Classes previously used for the assessment of Reaction to Fire and Fire Resistance and their replacement by European Standards. Specifically, the standards BS 476-6 and BS 476-7 were withdrawn on 2nd March 2025 and replaced by BS EN 13501-1. This reflected an appreciation that the previous national standards were no longer appropriate for use to demonstrate compliance with fire safety regulations. Accordingly, the surface linings of walls and ceilings in “circulation spaces” (communal areas/ escape routes) should, for the purposes of building control approval, achieve a minimum fire classification of Euroclass B-s3, d2 in accordance with BS EN 13501-1.

Accordingly, British National Class 0 as classified in previous versions of Approved Document B can no longer be used in that context to demonstrate compliance with the fire safety regulations and should no longer be referenced by manufacturers in their literature.

There is further clarity that, *reaction to fire* should not be conflated with *resistance to fire*. The two are entirely different requirements, the latter not being relevant for the purposes of interior wall and ceiling lining classifications.

Fire Safety Considerations in Existing Buildings

Unlike new buildings, existing buildings, particularly older communal buildings, are more likely to have undergone multiple refurbishments resulting in a build-up of paint layers. These buildings are therefore potentially at higher risk and the fire performance of the walls in circulations spaces/ escape routes/ communal areas is critical to the overall safety of the building.

There appears to be confusion about whether repainting existing buildings is within the scope of the Building Regulations and Approved Document B. Repainting is often considered as minor or major work, depending on the situation, but that is not the distinction relevant to the Building Regulations. It is not true that ALL refurbishment is not in scope of Building Regulations.

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The Building Regulations (The law itself, not the statutory guidance in AD-B) provide in regulation 3 that any building work which adversely affects the compliance of a building with "relevant requirements" set out in Schedule 1 to the Regulations is a "material alteration" which brings the works within building control. "Relevant requirements" include those relating to structure, fire safety, and access to and use of buildings.

Under Regulation 4(3) building work involving a "material alteration" to a building must ensure that the building complies with the applicable requirements of schedule 1, or where it did not comply with any such requirement it is no more unsatisfactory in relation to that requirement than it was before the work was carried out.
Interpreting this for our sector, repainting must not worsen fire performance in high-risk areas like escape routes, including staircases.

BCF Position on Fire Performance in Communal Areas
Due to the increased fire risk associated with the build-up of multiple layers of paint, particularly in higher risk areas such as communal areas/ circulation spaces/ escape routes the BCF's position is that paint applied in these areas should meet the same fire performance requirements as those set out for new buildings. That is to say that the requirements of BS EN 13501-1 should be met.

Although repainting carried out solely for cosmetic reasons is often considered minor work which may not automatically fall within the scope of Approved Document B, that is not necessarily correct (See above). The BCF believes that in all cases where paint is used in high-risk areas, it must not compromise fire safety. In line with Regulation 4(3) of the Building Regulations 2010, any work carried out must not result in a building that is more unsatisfactory in relation to fire safety than before the work was carried out.

Under the Regulatory Reform (Fire Safety) Order 2005 (RRFSO), the Responsible Person for a building typically the owner, landlord, or managing agent is legally required to carry out and regularly review a fire risk assessment for all communal areas/ circulation spaces/ escape routes. Where repainting is undertaken, particularly in high-risk areas, the fire performance of wall linings must be considered. If the repainting introduces a greater fire risk for example, through the build-up of combustible paint layers this must be addressed in the fire risk assessment.

It is the building owner's responsibility and duty of care and that of all persons who are Responsible Persons for the purposes of the RRFSO to ensure that redecoration does not compromise fire safety and to make appropriate risk assessments to ensure that is the case. However, Responsible Persons need to have the correct information to make suitable and sufficient risk assessments, they need to know that appropriate materials have been supplied and that they have been tested in accordance with up-to date standards.

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It should be noted in this connection that the BCF has been informed that a revision is in the course of being made to a guide relating to Fire Safety in Purpose-Built Blocks of Flats, approved by the Ministry of Housing Communities and Local Government for the purpose of assisting Responsible Persons under the RRFSO. It is understood that the new version which is likely to be published in the near future will retain a section on combustible surface finishes in escape corridors, lobbies and stairways, and that it will only refer to European Class B-s3,d2. This is in line with the government's intended direction of travel to move away from BS476

In view of this, the caveats in the current guidance and to support compliance, the BCF recommends that any coatings used for repainting or refurbishing communal areas, circulation spaces, and escape routes be tested to BS EN 13501-1 and achieve a minimum classification of Euroclass B-s3,d2, on a relevant substrate consistent with the requirements for new buildings and aligned with the principles of the RRFSO.

Fire retardant paints vs fire upgrading paint systems

The BCF has been working since 2023 on a replacement for the Warrington Blue Board which was a "worst-case" multi-layer test substrate used to demonstrate the performance of fire upgrading paint systems. The new substrate is the "Wallace Red Board". These paint systems can upgrade the reaction to fire performance of walls (linings) from Euroclass D or E to Euroclass B. They are recommended for use in high-risk areas, provided there is good adhesion between paint layers. BCF members have agreed to use the Wallace Red Board as the recognised standard for demonstrating the performance of these products.

In contrast, fire retardant paints may be used in low-risk areas where there are fewer paint layers present. In these cases, the paint manufacturer must provide test evidence based on substrates that simulate a lower-risk build-up than the Wallace Red Board. These products may be useful in communal areas where the build-up of paint layers and other contributing risk factors are reduced However, they are not intended to upgrade surfaces to meet the same stringent standards required for high-risk surfaces and buildings.
Any use of these products in communal areas/ escape routes/ circulation spaces should be achieving compliance with Euroclass B-s3, d2, and be supported by relevant test data.

Options for managing fire risk from paint layers

As per the "Code of Practice – Refurbishment of Communal Buildings and The Fire Risk of Multilayer Paints" (2005), the options are:

1) Strip the paint, then paint with an appropriately tested paint system.
2) Use appropriately tested conventional interior wall & ceiling paints
3) Use appropriately tested conventional flame-retardant paint over existing paint.
4) Use appropriately tested fire upgrading paint over existing paint.

See Annex 1 for flowchart on decision which option is appropriate.

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The Golden Thread

In line with the principles of the golden thread of information outlined in the Hackitt Report, the BCF believes that the fire performance of wall linings including the use of fire-retardant and fire upgrading paint systems should be clearly documented and traceable. This is particularly important in communal areas and escape routes, where refurbishment work may impact fire safety. The adoption of recognised test substrates such as the Wallace Red Board supports the creation of a reliable and auditable safety record, ensuring that decisions made during maintenance and redecoration are based on robust evidence.

The Industry lens and Product Stewardship approach

The BCF believes that, where fire safety is concerned, the industry should have an approach based on good product stewardship such that the safety of [inhabitants, residents and users] is recognised as being paramount. This involves adhering to the standards supported by industry as being the best modern classification available.

Note:

- In England and Scotland, the EN Class (BS EN 13501-1) is the only relevant classification standard for reaction to fire in Approved Document B (England) or the Technical Handbook (Scotland).
- In Wales and Northern Ireland, both the EN Class (BS EN 13501-1) and The National Class (BS 476 parts 6 and 7) are listed in Approved Document B (Wales) and Technical Document E (Northern Ireland).

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Annex 1: Fire Safety Paint Selection Flowchart for Escape Routes

N.B. Reference should be made to Section 6 (Site Inspection) of the Code of Practice – Refurbishment of Communal Buildings and the Fire Risk of Multilayer Paints (by Warrington Fire & DTI, 2005) when using this flowchart to ensure all inspection and assessment procedures are correctly followed.