

**Issue: DS 2021-064:** The petitioner Priscilla Huff, of Advanced Building Products is seeking a declaratory statement on whether ABP products manufactured for drainage and ventilation need to go through the product approval process to be approved by for the Florida Building Code if they are not structural?

**Background:**

Advanced Building Products (ABP) is a manufacturer of entangled net products for drainage and ventilation located In Sanford, Maine. They manufacture a variety of waterproofing products for residential or commercial applications. They have tried to bring their products to the Florida market but are met with the questions, "Do they have a Florida Building Code number?", or "Are they approved by the Florida Building Code?" They have had reservations from potential customers that aren't willing to bring in a product that isn't code approved. They are looking for an approval from The Florida Building Commission to finally be able to sell their product and prove that their product can be used within their wall system, or roof without conviction.

The applicant states she had done research and found that if their product was not structural then there wasn't a need for a Product Approval process. Their products provide drainage and ventilation within a system either below grade, aide wall, and roofing, but provide no structural integrity. Even making this statement is not enough. Their sales within this market could be much better if this issue was not In front of them at each turn.

**Chapter 61G20-3 Product Approval**

**61G20-3.001 Scope.**

(1) Products in the following categories as defined by subcategories of subsection 61G20-3.002(33), F.A.C., shall be available for approval by the Commission pursuant to Rule 61G20-3.007, F.A.C., for use in the state:

- (a) Panel Walls;
- (b) Exterior Doors;
- (c) Roofing Products;
- (d) Skylights;
- (e) Windows;
- (f) Shutters;
- (g) Structural Components; and
- (h) Impact Protective Systems.

(2) This rule applies to approval of products and systems, which comprise the building envelope and structural frame, for compliance with the structural requirements of the Florida Building Code.

**61G20-3.002 Definitions.**

(33) Subcategory of product or construction system means a specific functionality:

(a) For exterior door:

1. Exterior door assemblies: roll-up, sectional, sliding, swinging, automatic; pre-engineered roof access hatches; and products introduced as a result of new technology;
2. Exterior door components and products introduced as a result of new technology;

(b) For windows: awning, casement, dual action, double hung, single hung, fixed, horizontal slider, projected, pass through, mullions, and products introduced as a result of new technology;

(c) For panel walls: siding, soffits, exterior insulation finish system (EIFS), storefronts, curtain walls, wall louver, glass block, and products introduced as a result of new technology;

(d) For roofing products: built up roofing, modified bitumen roof system, single ply roof systems, spray applied polyurethane roof system, roofing fasteners, roofing insulation, asphalt shingles, wood shingles and shakes, roofing slate, roof tile adhesives, cements-adhesives-coatings, liquid applied roof systems,

underlayments, metal roofing, roofing tiles, waterproofing, roofing accessories that are an integral part of the roofing system and products introduced as a result of new technology;

(e) For shutters: accordion, Bahama, storm panels, fabric storm panel, colonial, roll-up, pre-engineered equipment, protection, and products introduced as a result of new technology;

(f) For skylights: skylight, and products introduced as a result of new technology; and

(g) For structural components: truss plates, wood connectors, anchors, exterior coolers-freezers, insulation form systems, engineered lumber, pre-engineered air conditioner stands, structural wall components, and roof deck, and products introduced as a result of new technology.

(h) For impact protective systems include types that are fixed, operable, or removable

## **Staff Analysis**

### **Question:**

Does ABP product's manufactured for drainage and ventilation need to go through the product approval process to be approved by for the Florida Building Code If they are not structural?

### **Answer:**

The answer to the Petitioner's question is no. Based on rules 61G20-3.001 Scope and 61G20-3.002 Definitions, the drainage and ventilation products in question are not structural products and therefore do not fall within the scope of the State Product Approval Program. However, these products must meet the requirements of the Florida Building Code and are subject to approval by the local authority having jurisdiction.