

## POSITION PAPER

# SBS position on the European Commission's work related to balustrade kits and railing kits

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### ➤ BACKGROUND

The mandate to CEN/CENELEC concerning standardisation work to draft harmonised standards on structural metallic products and ancillaries dates back to 1998.

Currently in mid-2016, the European Commission is in the process of drafting two important documents to take decisions related to balustrade kits and railing kits:

- 1) **IMPLEMENTING DECISION** on a standardisation request to the European Committee for Standardisation as regards balustrade kits and railing kits in support of Regulation (EU) No 305/2011 (CPR).
- 2) **DELEGATED DECISION** on the applicable systems for assessment and verification of the constancy of performance (AVCP) of balustrade kits and railing kits intended to be used in construction works solely to prevent falls pursuant to the CPR.

### ➤ COMMENTS AND RECOMMENDATIONS

- 1) Although recognising the need to proceed with standardisation work for balustrade kits and railing kits, SBS stresses the importance of the preparatory work for standardisation. This preparatory phase must in particular take into account the three following aspects:
  - a. Assessment of the economic and societal impact of the standards
  - b. Identification of the stakeholders concerned
  - c. Active involvement of the identified stakeholders in the standardisation work
- 2) In order to identify the impact of a standard balustrade kits and railing kits in support of the CPR, SBS asks the EC to provide statistics related to accidents caused by failure of balustrades.



- 3) SBS proposes to apply a combination of systems 2+ and 4 to assess and verify constancy of performance of balustrade kits and railing kits intended to be used in construction works solely to prevent falls. More specifically, SBS proposes the adoption of:
  - AVCP system 2+ for balustrades with no structural function and horizontal load higher than 0.5 kN/m to be installed in public spaces (e.g. schools, stadiums, train stations) following the award of public works contracts; and
  - AVCP system 4 the same products with horizontal load lower or equal to 0.5kN/m to be installed for private uses (e.g. houses).
- 4) The Annex I of the EC implementing decision lists among the requested deliverables seven (7) different and separate European Standards for the same product made of different materials (i.e. steel/cast iron, aluminium, timber/wood products, glass, precast concrete, natural stone, composites). SBS rejects totally this approach and requests that all regulatory provisions are addressed in one single European Standard.
- 5) In order to tackle issues deriving from potential different interpretations of some terms and concepts, the CPR sought to clarify the most pertinent terms and concepts relating to the legislative framework for construction products. However, SBS asks the EC for clarity in and consensus with regard to the definition of 'kit'. SBS is working on this issue also in the framework of action 5 of the Joint Initiative on Standardisation, aiming at clarifying the meaning of construction products in the sense of CPR.

With regard to balustrade kits and railing kits, SBS proposes that such definition is discussed within the main EC *fora* dealing with construction standardisation (i.e. Advisory Group and Standing Committee on Construction) and is clearly reported in the relevant standardisation request.

