

Fire doors and internal pedestrian doorsets at risk: the European Commission needs to act now!

EuroWindoor, the European Door & Shutter Federation and Small Business Standards are calling on the European Commission (EC) to implement the below three-step approach to minimise the impact on the sector:

- extend the co-existence period for EN 16034 beyond 1 November 2019
- ensure that it is aligned with the co-existence period for EN 14351-2
- cite EN 14351-2 in the Official Journal of the European Union without any further delay

EuroWindoor, the European Door & Shutter Federation and Small Business Standards strongly support the basic principles of the Construction Products Regulation (CPR)¹. In this context, the standardisation process and harmonised standards play a key role in enabling an internal market.

As regards doors, however the standardisation process, is constrained by:

- requirements originating from an old mandate (Mandate 101 dating from 1994)
- the obligation to use CEN and European Commission (EC) templates that are subject to regular modifications
- CEN-CENELEC internal regulations, including timeframes, principles and rules, which cannot be tailored to specific needs

CEN/TC 33 “Doors, windows, shutters, building hardware and curtain walling” is trying to comply as far as possible with different requests coming from CEN and EC related officials, which moreover are sometimes contradictory. Requesting clarifications concerning the expected results from these officials is a time-consuming process and does not always come to a conclusion. The positions of the CEN and EC related officials can also change creating additional complexity to an already complex environment.

Nonetheless, EN 14351-1², EN 14351-2³ and EN 16034⁴ were finalised and published in all Member States. Therefore, the economic actors are concerned and do not understand why, after so much time and effort, the published standards cannot be used for CE marking in the context of the CPR.

The concerns apply especially for fire doors and internal pedestrian doorsets. Indeed, significant problems will appear after 1 November 2019, when the co-existence period for EN 16034 will come to an end.

¹ Regulation (EU) No 305/2011

² EN 14351-1:2006+A2:2016 – Windows and doors – Product standard, performance characteristics – Part 1: Windows and external pedestrian doorsets

³ EN 14351-2:2018 – Windows and doors – Product standard, performance characteristics – Part 2: Internal pedestrian doorsets

⁴ EN 16034:2014 – Pedestrian doorsets, industrial, commercial, garage doors and openable windows – Product standard, performance characteristics – Fire resisting and/or smoke control characteristics

Therefore, EuroWindoor, the European Door & Shutter Federation and Small Business Standards are calling on the EC to implement the below three-step approach to minimise the impact on the sector:

- **extend the co-existence period for EN 16034 beyond 01 November 2019**
- **ensure that it is aligned with the co-existence period for EN 14351-2**
- **cite EN 14351-2 in the Official Journal of the European Union without any further delay**

For the sector to be able to CE mark all the products covered by EN 16034 in combination with either EN 14351-1 or EN 13241⁵ without additional testing - in other words without any additional costs – finalising some supporting standards is required. These supporting standards are the standards series of EN 17020 for extended field of application for durability of self-closing⁶ and the revised versions of some parts of EN 15269-series for extended field of application for fire resistance and/or smoke control standards⁷. CEN/TC127 “*Fire safety in buildings*” WG 3 “*Fire doors*” is currently working on all of the previously-mentioned supporting standards, but they will not be published before the end of the co-existence period of EN 16034, i.e. before 01 November 2019. There is a risk that products are excluded from the market, if there is no extended field of application in an EXAP standard available.

For pedestrian doorsets, the mandatory CE marking of external fire doors, without being able to simultaneously CE mark internal fire doors, will also lead to additional difficulties and to additional costs for manufacturers as well as creating confusion on the market. Some pedestrian doorsets are intended for both internal and external use and the manufacturer does not always know what the final use will be when placing the product on the market. With no extension of the co-existing period, some products placed on the market will consequently have to bear both a CE marking (for intended use as an external fire door) as well as a national certificate/mark (for intended use as an internal fire door). Even though the test method might be the same, different certification bodies in each Member States will typically be necessary and the costs for complying with the national certification schemes will come on top of the already existing costs, such as for factory production controls that are required for CE marking. For the market, it will be difficult to understand why two different markings are required for the same product and why it is possible to CE mark external fire doors while it is impossible to CE mark internal fire doors, as internal fire doors are the most commonly used product.

As many internal doors also need to provide protection against noise, the sector should have the possibility to CE mark these products according to EN 14351-2 without any further delay and by doing so, remove the remaining national trade barriers. CEN/TC 33 oversees the work on EN 14351-2 and has been working in a constructive manner for many years to achieve a positive assessment based on the existing rules at the time of publication. To answer the mandate and to fulfil the CPR requirements, the industry has deployed great efforts and means, resulting in the removal of trade barriers and by doing so making the European industry overall stronger. With the work on standard EN 14351-2 not coming to a conclusion, the European industry is not only frustrated but it is also hampering the benefits of being part of an internal market. The sector is of the opinion that the standard EN 14351-2 is ready for the purpose of

⁵ EN 13241:2003+A2:2016 – Industrial, commercial, garage doors and gates – Product standard, performance characteristics

⁶ prEN 17020-series – Extended application of test results on durability of self-closing for fire resistance and/or smoke control doorsets and openable windows

⁷ EN 15269-series – Extended application of test results for fire resistance and/or smoke control for door, shutter and openable window assemblies, including their elements of building hardware

CE marking and cannot wait until new standards are finalised based on a new standardisation request.

EuroWindoor, the European Door & Shutter Federation and Small Business Standards call for the EC's understanding and full cooperation to ensure that the sector will shortly be able to take its next important step towards a true internal market.

On behalf of the above-mentioned European federations:

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About EuroWindoor AISBL – EuroWindoor AISBL was founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 18 national associations speak for European window, door and facade manufacturers that are in direct contact with consumers, and thereby having large insights on consumers' demands and expectations. We are at the forefront interacting with dealers, installers and consumers buying windows and doors, and the companies behind the associations cover selling all over Europe.

About E.D.S.F. – The European Door & Shutter Federation e. V. was initiated in the late 1980s by members of existing national door and shutter manufacturing associations in France, Germany and UK who were, at that time, monitoring on behalf of their association members the drafting of proposed harmonised test methods for fire resistance. Later E.D.S.F. has expanded its monitoring to cover issues relating to general door standards as well as fire resistance.

About Small Business Standards – SBS is a European non-profit association co-financed by the European Commission and EFTA Member States. Its goal is to represent and defend small and medium-sized enterprises' interests in the standardisation process at European and international levels. Moreover, it aims at raising the awareness of small and medium-sized enterprises about the benefits of standards and at encouraging them to get involved in the standardisation process.

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