CEN/TC 33/WG 4
Building hardware

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CEN-TC33 N3752 Proposal on the future of CE marking for

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"Doors, windows, shutters, building hardware and curtain walling"

"Portes, fenêtres, fermetures, quincaillerie de bâtiment et façades rideaux"

"Türen, Tore, Fenster, Abschlüsse, Baubeschläge und Vorhangfassaden"

CEN/TC 33 N 3752

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Proposal on the future of CE marking for building hardware

Action: Contribution at the discussion of the item 6.1 of the 42nd plenary meeting of CEN/TC 33 (Brussels, CCMC on April, 03 and 04, 2019)

Source: ARGE

Comments: The argumentation of the proposal is followed by a FAQ

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The future of CE marking for building hardware

Background

Following their last plenary meetings in September 2018, the ARGE and TC33/WG4 decided to propose that the hEN harmonized standards for locks (EN12209, prEN15685, EN14846) and hinges (EN1935) would be modified to non-harmonized standards, and removed from the new upcoming Standardization Request.

All the other harmonized standards for hardware on escape routes, providing real benefits to ensure safety in case of emergency, would be maintained as harmonized standards: EN1125, Panic Exit Devices; EN179, Emergency locks; EN13637, Exit systems; EN1154, Door closing devices; EN1155, Hold open devices; and EN1158, door coordinators.

Reasons for this proposal

The existing mandate M101 process for hEN of building hardware does not work, and it is anticipated that the new Standardization Request will not improve that situation.

No candidate hardware hEN standard has been cited in the OJEU for 10 years. This is mainly due to the particular status of hardware, which can be considered more as components than construction products, such as doorsets or windows.

Non-harmonised standards are built or revised much faster, and can therefore better stick to the market needs.

The CE marking of locks and hinges doesn't bring any added value, neither to the hardware manufacturers nor to their customers.

In addition, the essential characteristics of components such as hardware can only contribute to the performances of the doorsets, but can't be granted as such.

In particular, "suitability for use on fire doorsets" does not add anything for the customers. A fire test evidence is anyway needed to make sure the hardware is suitable for particular fire doorsets.

In the past few years, CE marking created a lot of confusion in the market, and the DoP is usually ignored.

Most of the Customers mix-up CE marking with quality evidence. This is even more relevant with the CPR, as the CE marking doesn't mean anymore compliance with relevant standard requirements.

By removing the CE marking, hardware manufacturers expect to enhance the quality of their products, avoiding confusion in the market.

FAQs : If EN12209, EN14846, EN1935 are no longer harmonized, then, as a doorset manufacturer, …

I won't have any more evidence for the hardware fire suitability
The CE marking of hardware regarding « suitability for fire doorsets » is meaningless, and even misleading.
This only means that the hardware passed one fire test, with one specific doorset, with one classification.
Then, the fire test evidence is necessary anyway to ensure that the hardware can be installed on a fire doorset or not.
The CE marking in this case can only be considered as a pre requisite to equip a fire door.

I won't have any more Factory Production Control (FPC) for the hardware, and I, as a door manufacturer will have to do so in order to CE mark my doorset.
FPC of doorsets involve controls of doorsets only, and not hardware by their own.
The locks and hinges hEN standards are mandatory today only for hardware suitable for fire doorsets. The locks or hinges, not suitable for fire doorsets, or cylinders and handles are not CE marked.
Then, for EN14351-1 or EN14351-2, this situation already exists.
For fire characteristics, the FPC doesn't include the fire testing.
When the manufacturer is certified to ISO 9001 and 9002, then the production reliability has to be verified anyway.

Interchangeability of hardware wouldn't be possible anymore
EN 15269 EXAPS serie already consider all the components, regardless if they are CE marked or not.
Today, for example, handles to EN1906 and cylinders to EN1303 are already considered into the EXAPS, whereas both standards are voluntary. The EXAPS rules would then continue to apply for locks and hinges, as currently.

If burglary resistance is included in the future as essential characteristic in the EN14351-1 and EN14351-2, then how could we rely on the hardware performances about anti- burglary?
Hardware, as a component, can only contribute to anti-burglary of the doorset, but can't be considered by its own as an evidence for it. It is the same issue as for the fire suitability.
Only burglary resistant doorsets should potentially be covered by harmonised standards and not the respective building hardware on their own.

I wouldn't have any more evidence from the hardware manufacturer that the hardware fit with the doorset essential characteristics
In EN14351-1 and prEN14351-2, only the EN1935 is cited in 4.10:

4.10 Ability to release

Emergency exit devices [A1], hinges [A1] and panic devices installed on external pedestrian doorsets in escape routes shall comply with EN 179, EN 1125 [A1], EN 1935 [A1], prEN 13633 or prEN 13637.

Doorsets intended for escape routes shall be identified as such with the appropriate class according to Table 2.

We know that the hinges to EN1935 have a very negligible influence on the ability to release, as they are tested now. If EN1935 becomes non harmonized, then the reference to it could be easily withdrawn from this clause, without jeopardizing the characteristic « ability to release » of the doorset.

In EN16034, the harmonised hardware standards are only considered in 4.5.2.2.:

4.5.2.2 Durability of self-closing against ageing (corrosion)

The durability of self-closing is considered to be achieved if the building hardware used in the doorset and/or openable windows complies with the relevant clauses of the building hardware product standards as listed in Table 2 except in cases where the hardware is classified by these standards as not corrosion resistant. Building hardware not covered by product standards listed in Table 2 shall show their compliance to EN 1670.

The durability of self-closing against ageing (corrosion) of the doorset and/or openable window shall be expressed as "achieved".

If EN12209, EN1935,…, are not harmonised anymore, then they will have to be withdrawn from the table 2 of EN16034, and will have to be considered like the handles or cylinders.
In order to ensure the performance level of durability or other characteristics, then a hardware manufacturer can apply the EN standard, and claim the performance classification accordingly. The tests would be performed in the same accredited labs as today. Accreditation of labs is independent from CE marking.

We would want to rely only on the CE marking, and not to the local quality marks when existing, and then have to pass several costly certifications
The local quality marks deal mainly with anti-burglary (Kitemark, VdS, SKG, SSF 3522, A2P,…), are voluntary, and have a totally different purpose than the CE marking.
CE marking of hardware only means transparency of performances declared in the DoP. But it doesn't presume at all the quality of the product.
To ensure quality, door manufacturers could rely on tests according to hardware EN standards, with classification table report delivered by an accredited lab.
Furthermore, with the CPR, each EU country has the authority to choose their adequate level of performance required, according to their own regulation. Then, even with the CE marking, the performances required may be different from one EU country to another.

What are the rationales to switch only a part of harmonized standards to non harmonized standards? Why not all or none of them?
The essential characteristics of hardware make sense if they deal with safety in escape routes. For example, CE marking of a Panic Exit Device ensure that operating forces are low enough, and durability has been tested.
That's why it is proposed to keep harmonized only the standards which are directly linked to the « safety on escape routes », and to « de-harmonize » the ones only linked to « suitability for fire doors ».

Could we still use a non harmonized hardware standard for reference to an essential characteristic in a hEN doors standard (EN14351-1, EN14351-2)?
A non harmonized standard can be referred on a voluntary basis, as the current non-harmonized standards are mentioned so far for cylinders or door handles.