

### IMPORTANT NEWS:

# Business as usual for ironmongers after introduction of CE marking of doorsets

Towards the end of 2011 we expect to see the introduction of some new EN standards covering doorsets. Doorsets complying with these standards can then be CE marked. This development has caused some confusion in the UK market, and this Technical Update addresses the concerns which have arisen. It also reviews the expected changes to the Construction Products Directive and Regulations that are anticipated for 2013.

#### Let's firstly establish some facts:

- A doorset is a door construction comprising a door leaf (or leaves), frame and all associated hardware, glazing and seals, supplied to site from ONE IDENTIFIED MANUFACTURER (usually the door manufacturer), completely or partly pre-assembled
- It is doorsets which are covered by the new standards, so only doorsets will be affected by CE marking to these EN standards
- The UK market, serviced by architectural ironmongers, traditionally offers timber doors as "door assemblies". This means that the door, frame and associated hardware arrive on site as COMPONENTS from SEVERAL

SOURCES (door blank manufacturer, joinery shop, glass supplier, architectural ironmonger etc) and these are assembled on site.

- Door assemblies produced on site from several sources are not covered by the new standards, so there is **NO** requirement for them to be CE marked. There is no single identified manufacturer who could take responsibility for the CE marking of such a door assembly.

Therefore AIs and door blank manufacturers can continue to provide components for door assemblies that are assembled on site, just as they do at present. The current recommendations for **CE marking of ironmongery will remain unchanged** where doors are used for fire or escape purposes.

**// The EXAPs give details about what can and can't be changed on a CE marked doorset. If you are supplying hardware to doorsets, you will have to liaise with the doorset manufacturer to ensure that the EXAP rules are followed rigorously. //**

## Changes to ironmongery supplied for fire doors

### Door assemblies

When we schedule ironmongery for fire doors, it's not usually exactly the same brand and model number that the door was fire tested with. Therefore ironmongery offered for a fire door has to have some form of documentary evidence to support its use on that type of fire door. This is covered in detail in our "Code of Practice: Hardware for fire and escape doors" available at [www.firecode.org.uk](http://www.firecode.org.uk).

These documents, listed in the Code of Practice (1.5 Documentation), will continue to be the way we show that door hardware is suitable for the door assembly for which it has been scheduled.

### Doorsets

In future, for doorsets only, there will be much more precise requirements, and it will be necessary to follow a set of rules called "EXAPs" (short for "**Extended Applications of test evidence**").

The EXAPs give details about what can and can't be changed on a CE marked doorset. If you are supplying hardware to doorsets, you will have to liaise with the doorset manufacturer to ensure that the EXAP rules are followed rigorously.

**The GAI has developed these notes (to be followed by other support material) so members can be fully briefed about these changes. This will help them and their staff to provide clients with the professional guidance they need now and in the future.**

## Ironmongery for Doorsets

### TERMINOLOGY:

#### CE

The abbreviation for the French phrase "Conformité Européene".

#### EN

European Norm.

#### Doorset

A complete unit consisting of a door leaf, or leaves, frames and supplied with the hardware and seals, **from one source**.

A doorset can go to site completely or partly assembled. Often, surface mounted hardware is left off and supplied boxed, as it could be damaged in transit.

#### Door assembly

A variety of components, such as door leaf or leaves, frames, hardware and seals, supplied to site **from several sources** for assembly in the construction.

#### CPD

The existing Construction Products Directive – currently incorporated into UK law as the Construction Products Regulations Act. The CPD was interpreted in UK legislation as leaving CE marking optional. Most other CEN Member States interpreted the Directive as making CE marking mandatory.

#### CPR

The future Construction Products Regulation. When this Regulation is passed by the EU Commission and Parliament, it will become law in all CEN Member States, without "interpretation". One of the effects of this move will be mandatory CE marking of anything that can be CE marked. The option not to mark will be removed.

#### EXAPs

Extended Application of test results. These are the rules which govern the alteration of a CE marked fire or escape doorset. They ensure that any changes will maintain the doorset's function at the tested level, or better.

#### Interchangeability

The possibility of, and process for, changing door hardware without negatively affecting previously measured fire or escape doorset performance.

#### Harmonised standard

A standard against which products can be CE marked. Not all standards are harmonised.

#### Similar product

An alternative product which will not change the classification and/or the declared value of a performance characteristic of the doorset to a lower value. In other words, the change must not lessen the minimum declared performance of the doorset, but it may improve it.

#### HPS

A Hardware Performance Sheet (HPS) is a summary of test evidence, designed to facilitate the interchangeability of building hardware on fire resisting and smoke control doorsets.

## Frequently Asked Questions



The following FAQs should help clarify the developments to date. If you have any further questions then please contact:

**Jacky Sinclair**, GAI Technical Consultant,  
Tel: 01952 414411 or 07852 225996.  
Email: [jacky@jrconsultancy.co.uk](mailto:jacky@jrconsultancy.co.uk)

### When will the doorset standards be published?

EN 14351-1 External escape route doors	March 2006
EN 14351-2 Internal doors (non fire)	2011 (Estimated)
EN 16034 Internal and external fire doors	2011 (Estimated)

### What do the standards cover?

EN 14351-1 External escape route doors	Final exit escape doorsets with hinges, panic or emergency exit devices.
EN 14351-2 Internal doors (non fire)	Doorsets that are not designated fire, or final escape.
EN 16034 Internal and external fire doors	Doorsets with a fire resistance function where hinges, door closers, locks, panic or emergency exit devices, or any other mortised hardware, might be fitted.

### When will CE marking of doorsets start?

EN 14351-1 External escape route doors	1st February 2010
EN 14351-2 Internal doors (non fire)	2012 (Estimated)
EN 16034 Internal and external fire doors	2012 (Estimated)

### When could CE marking of doorsets become mandatory?

This will depend on the current Construction Products Directive (CPD) being replaced by the new Construction Products Regulation (CPR). This change is presently expected to take place sometime in 2013.

### As an Architectural Ironmonger how is this going to affect me?

As we explained in the opening statement, if you are selling hardware for door assemblies, then nothing will change.

If you are looking to supply hardware for doorsets then you may need to think about the EN standard and EXAP's that could affect this area.

If you are looking to specify doorsets and hardware then, when introduced, the CPR will enforce CE marking as a minimum.

### As a hardware manufacturer how does this affect me?

If you are currently offering CE marked hardware items for sale on the open market then nothing will change.

If you are placing hardware items on the market that are not CE marked and they have a harmonised standard, then the introduction of the proposed CPR will make this practice illegal.

### If I have a CE marked doorset, can I change the ironmongery from that used when it was tested?

It will be possible to change the ironmongery by using the EXAP assessment rules and the Interchangeability of Hardware Performance Standards that have been produced. You must make any changes strictly within the rules.

## Frequently Asked Questions



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### What are EXAPs?

EXAP's are assessment standards that allow a Notified Body (such as Warrington Certification Limited) to increase / change products that are covered on a CE marking certificate, such as door sizes, hardware items, etc.

***I'm being advised by the local building controller and fire safety officers that I need to provide evidence of Certification for the fire doorset as a whole, and not just for individual hardware items. Is this correct?***

This is not the case. Currently you can only supply CE certification for the hardware as these items have published harmonised product standards. If in the future you get asked this question (after 2011), it will be down to the supplier of the doorset to provide such evidence, but only where a **CE marked doorset** has been requested in advance of any contract.

Currently, facility managers, local building and fire safety officers can ask for Third Party Certification for the fire door, such as the Certifire scheme. This is often done to enhance the level of confidence that the complete door assembly will achieve the required level of fire safety and durability performance.

### What about door kits?

"Door kit" is a UK term which describes a door and frame supplied in kit form, with some or all of its hardware. If all the components are supplied to site from ONE SOURCE (one invoicing entity) then this qualifies as a doorset. If some components are supplied from other sources, then it falls under the same rules as a door assembly.

***I currently work with a local joinery company which makes doorsets, and occasionally buys ironmongery from us. When CE marking of fire doorsets is introduced will I still be able to replace their current CE hinges with another brand of CE hinges without having to go through an additional fire test?***

Yes, the Interchangeability Hardware Performance Standard allows you to change the hinges for a similar CE grade of hinge, material, performance, and the fire test assessment will be covered under the EXAP rules.

***Once a doorset is given a CE mark can I change the specification of the ironmongery as long as the products I use are CE marked?***

Yes, the Interchangeability Hardware Performance Standard allows you to change all the CE marked ironmongery for **similar products** that are also CE marked. The fire test assessment will need to be covered under the EXAP rules.

**Note:** you will have to add the new hardware items to the original CE certificate as proof of compliance.

***Can I supply different brands of products for CE marked doorsets?***

Yes, the Interchangeability Hardware Performance Standard and EXAP's will allow a CE certificate for a doorset to list numerous door closers, locks, hinges, glass sizes, etc. where they fall inside the scope of approval.