



institute of
architectural
ironmongers

Limiting your risk

in Sourcing, Specification and Supply

JRS CONSULTANCY

Working with standards

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DipGAI, RegAI, FInstAI

Introduction



Is this an elephant?

Introduction



Is this a picture of a
Cartier watch?



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Introduction

CERTIFICATE

CERTIFICADO

CERTIFIKAT

證書

CERTIFICATE

CERTIFIKAT

EC Attestation of Conformity

No.: E8 03 10 51149 002

TÜV
PRODUCT SERVICE

Union Best Enterprise Ltd.
Unit D, 7/F., Good Year Industry
Bldg., 119-121 How Ming Street,
Kwun Tong,
Hong Kong

Item Identification: Household Equipment (EMC Directive)

Model No.: U633, U631, U634, U638

Item Description: Wired Door Bell

Parameters: Rated Input Voltage : 3 V DC
Protection Class : III

The equipment complies with the principal protection requirements of the EMC Directive (Directive 89/336/EEC relating to electromagnetic compatibility) based on a voluntary test.

This attestation applies only to the particular sample of the product and its technical documentation provided for testing and certification. The detailed test results and all standards used as well as the operation mode are listed in

Test report no.: 60/710.3.337.01


Test standards: EN 55014-1/A2:2002
EN 55024/A1:2001
EN 61000-6-3:2001


This attestation is released with the above mentioned attestation number by the Certification Body of TÜV PRODUCT SERVICE. It does not permit the use of a TÜV PRODUCT SERVICE certification mark.

After preparation of the necessary technical documentation as well as the conformity declaration the CE marking as shown below can be affixed on the equipment as stipulated in Article 10.1 of the Directive. Other relevant Directives have to be observed.

CE

Department: TECC113 / nc
Date: 07-Oct-2003





152183

TÜV PRODUCT SERVICE GMBH · Zertifizierstelle · Ridlerstrasse 65 · D-80339 München

Is this a Manufacturer's Declaration of Conformity with standards?

What are the hazards to be analysed?



- Accepting products at face value
- Not checking supporting documentation
- Incorrect/inappropriate documents
- Incorrect specification

What risks arise from the hazards?

Hazards

- Door and/or hardware not fit for purpose

Risks

- Entrapment, injury or death of persons
- Lack of expected performance or appearance
- Financial loss to your company

What are the possible consequences?

- Cost of supplying FoC replacements
- Labour costs for refit and making good
- Loss of stock
- Loss of client for future work
- Loss of web site and/or literature (false claims)
- Legal action against company (fines/prison)
- Bad publicity (spreads like wildfire these days)

When you make your hazard analysis and risk assessment, remember –



- If you speed, risk is limited to a short time/distance.
- Products you supply will be in a building for many years – the original risk level persists, or increases with wear and tear.



Sourcing –
what you put in
your warehouse.
How can you
reduce the risk
in offering it for
sale?

Accepting products at face value (See - it's just the same as a DIN lock!)



How do you prove it's a real elephant? Or a safe-to-offer

- ✓ Hinge
- ✓ Lock/bolt
- ✓ Lever
- ✓ Pull handle
- ✓ Door closer
- ✓ Emergency exit device
- ✓ Panic exit device

Product standards are almost the only way of showing compliance with key legislation:

- **Construction Products Directive**
CE mark / ENs / ETAs
- **UK Building Regulations**
Recommend standards as proof of “proper materials”; and that products are “state of the art” and “current rule of technology”

Standards are not mandatory, **BUT** –

what do you lose if you ignore them?

- Legal protection of the CE mark
- Evidence of “proper materials” being used
- Evidence of fitness for purpose
- Evidence of due diligence on your part

Courts make judgements based on evidence

Legal framework:

- **Construction Products Directive**

- Affects all in the supply chain from the point where the product is “first put on the market” in the EU, up to supplying the installer
- Basic message – CE marked products meet the “essential requirements” (safety in case of fire and in use) – in Annex Z.A of hEN
- Non-harmonised ENs also address essential requirements
- Alternative means of proving compliance *theoretically* available



CPD: - *Health and safety at work*

33. - (1) **In any proceedings against a person for an offence under any of the relevant statutory provisions (as defined in section 53(1) of the Health and Safety at Work etc. Act 1974 or Article 2(2) of the Health and Safety at Work (Northern Ireland) Order 1987) which impose requirements with respect to any matter it shall be a defence for that person to show that the requirements of these Regulations were satisfied in relation to that matter.**

Sourcing



(Photo courtesy of Arnold Tarling)

If your hinges wear and the door drops;
if your closer slams the door and injures someone;
if your latch jams and traps a person in or out of a room –
the CE mark can be a protection and defence
which stops the matter going to court.

Legal framework:

- **Building Regulation 7 (England and Wales)**
 - Materials and workmanship to be “proper”
 - Covered for CE marked products
 - For non-CE markable products (e.g. levers)
 - ✓ Test to an EN or national standard
 - ✓ Other relevant European specification
 - Standards represent –
“**current state of the art & acknowledged rule of technology**” – the measure for acceptability

Legal framework:

- **Building Regulation 38 (UK)**

- Maintenance info on fire and escape door hardware must be passed to client

(2) The person carrying out the work shall give fire safety information to the responsible person not later than the date of completion of the work, or the date of occupation of the building or extension, whichever is the earlier.

(3) In this regulation—

(a) “**fire safety information**” means information relating to the design and construction of the building or extension, and the services, **fittings** and equipment **provided in** or in connection with **the building** or extension **which will assist the responsible person to operate and maintain the building or extension with reasonable safety;**

Building Regulation 38 (UK)

- Maintenance info on fire and escape door hardware must be passed to client
 - Brochure or other means of product ID
 - Info on standards compliance
 - Fixing/operating instructions
 - Maintenance instructions provided by manufacturer
 - Maintenance checklist from GAI website, Technical Section

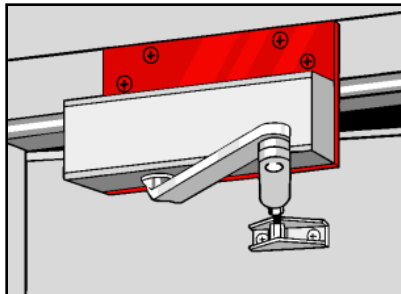


Accepting claims at face value (of course it's CE marked and fire-rated!)



How do you prove this is a Cartier watch? Or that your products really meet the standards you claim

- ✓ Relevant standards – know them
- ✓ Understand and check the classification codes
- ✓ Ensure all accessories/finishes and variants are included in any CE mark or fire certification



Accepting standards claims at face value



- ✓ Check fire test evidence is OK for unlatched doors
- ✓ Check fire test evidence for the range of timber/steel door types and ratings (e.g. look at ALL the Certifire data).

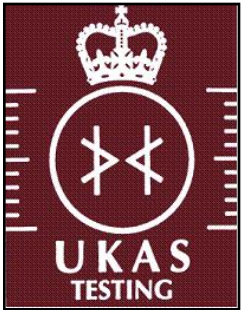
Incorrect/inappropriate documents (Here's our Manufacturer's Declaration!)



Demand and keep on file (e-data is OK)

- ✓ ManDecs of Conformity with standards including classifications (must be on company headed paper and signed by senior person)
- ✓ Certifire data – not just the front page, include data tables
- ✓ Maintenance information

Provenance of standards documents



- Notified laboratories should be used for testing
 - Evidence from outside EU has no more validity than a manufacturer's claim



- Is compliance test a “one off”, or is compliance ongoing?
 - 1st or 3rd party attestation of conformity
 - FPC
 - Audit testing

Ownership of CE mark

- Not transferable just by applying new branding – potentially illegal application of the mark
 - Traceability paramount
- Company applying the CE mark must ensure correct provision of –
 - Classification
 - Marking
 - Fixing instructions
 - Maintenance information on fire safety fittings for passing to client

Ways to minimise risk - recap

- Analyse your product offering thoroughly
- Standards compliance at right level: state of the art/current rule of technology
 - Durability
 - Fire test information
 - Corrosion resistance
- Supply CE marked product for best protection
- Supply tested and audited product wherever possible
- Maintenance file to contractor/client



Remember –

- A speed limit is for a short time and distance
- Products you supply will be in a building for many years – the original risk level persists.

Don't sell time-bombs!



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Thank you!

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