



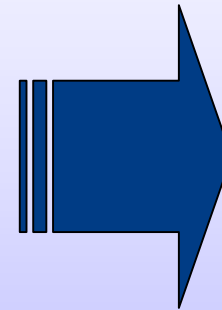
THE EUROPEAN FEDERATION OF ASSOCIATIONS OF LOCK AND BUILDERS HARDWARE MANUFACTURERS
ARBEITSGEMEINSCHAFT DER VERBANDE DER EUROPÄISCHEN SCHLOSS - UND BESCHLAGINDUSTRIE
FEDERATION EUROPEENE DES ASSOCIATIONS DE FABRICANTS DE SERRURES ET FERRURES

Feed back on CE marking experience

ARGE Conference, Helsinki, 11 June 2004
WG C – Standardization
Alain Varenne, JPM

Agenda

1. The TG 10 experience
2. Benefits of CE marking
3. Problems raised
4. Potential consequences
5. Proposed actions



CE
marking

1. The TG 10 experience

- The first published harmonized standards
 - EN 1125 and EN 179 published in 1997
 - Replaced existing National standards or requirements
- CE marking for Panic and Emergency Exit Devices
 - Amendment A1 published in 2001
 - CE marking applicable since April 2002
 - CE marking mandatory since April 2003
- System 1 certification scheme applicable
 - Some manufacturers and NB's already familiar with third party certification of exit devices through Conformity marks, but
- CE marked exit devices available on the market

2. Benefits of CE marking

- Set the minimum safety requirements
 - CE marking gives a presumption of conformity with the legal requirements of the Directive
 - Mandatory for all
 - Provides a 3rd party input to testing and manufacturing processes
 - Dangerous products should be swept away
- Open new potential markets
 - Standards available in all EU countries
 - Enable access to all European markets
 - CPD transferred into all National EU regulations
- Add a perceived level of quality



2. Benefits of CE Marking (Cont'd)

- Opportunity to sell up to a standard rather than down to a price
 - Makes it illegal to sell “rubbish” products
 - Restricts growth of low cost, low quality imports
- Provides a new series of marketing messages for the industry to promote
 - Enables us to enhance our reputation within the industry for providing professional advice/guidance
- Gives a defence against product liability claims



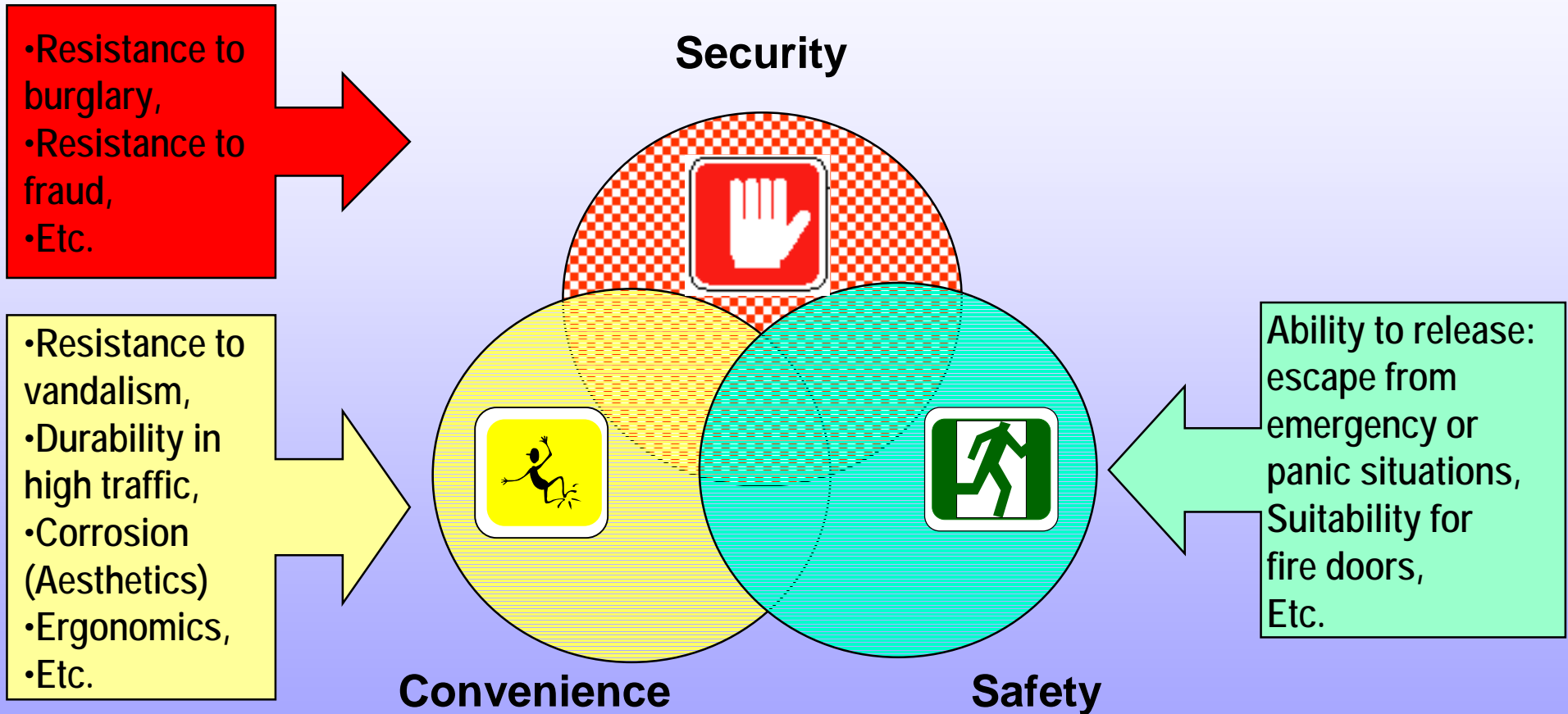
3. Problems raised

- The first generation of standards is not perfect
Common language, but...
 - Differences in standard interpretations by labs and NB's
 - Different level of experience
 - Differences in certification procedures between NB's:
 - Validity of certificates,
 - ITT done at manufacturers' premises instead of NB's lab
 - Products from the series do not always reflect ITT results
 - Changes on products not always validated
- CE marking not mandatory in all EU countries (Sweden, UK, etc.)
...although best way to show compliance to standards and CPD

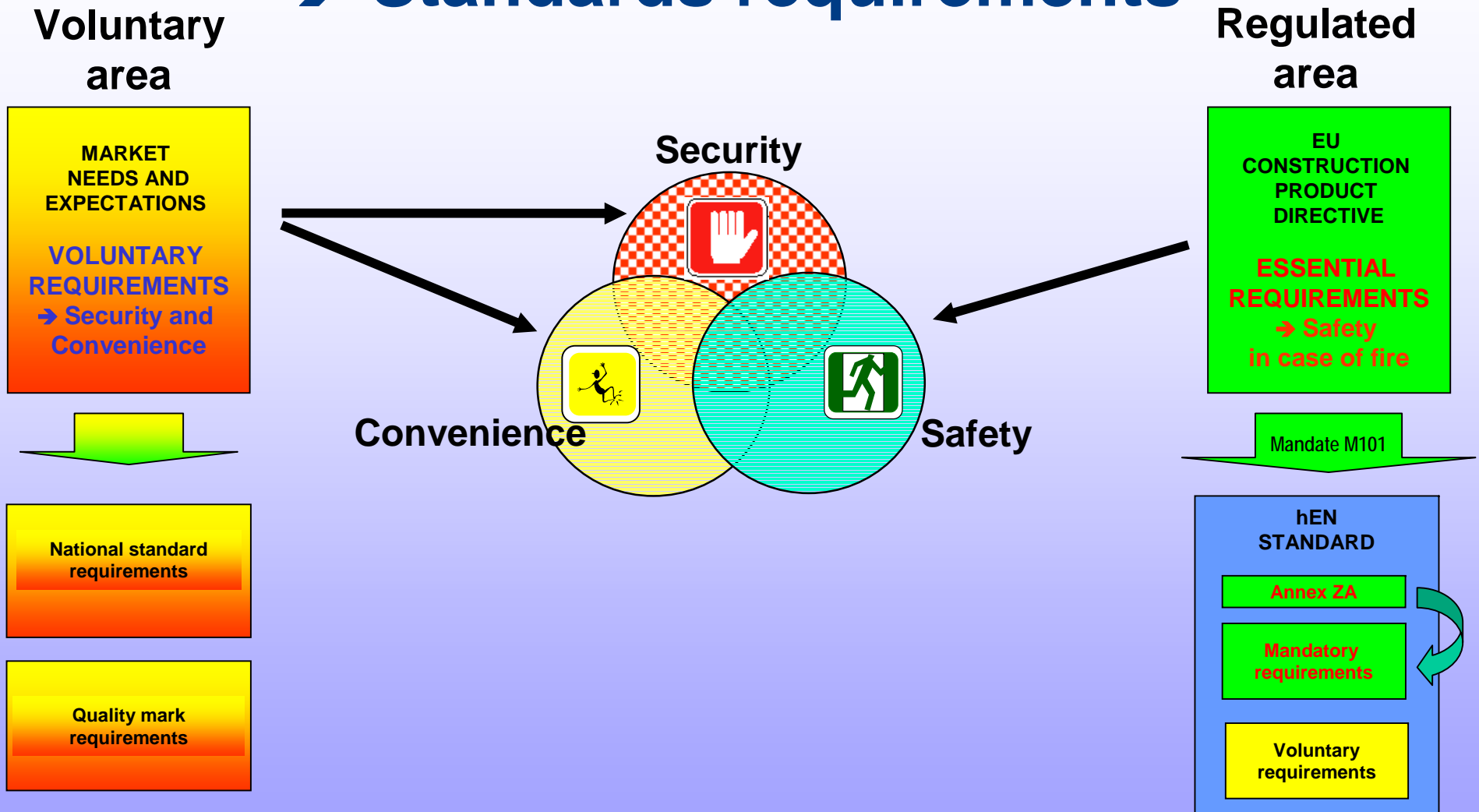
3. Problems raised (Cont'd)

- National fire regulations are still different
 - No common view for choice of products
 - ➔ Swedish and Italian proposals
- CE marking covers only safety requirements (CPD essential requirements), not other market needs or expectations
 - Security: burglary resistance, vandalism, etc.
 - Convenience: ergonomics, low operating efforts with other door equipment (seals, hinges...), etc.
 - ➔ Need for additional requirements and attestation of conformity

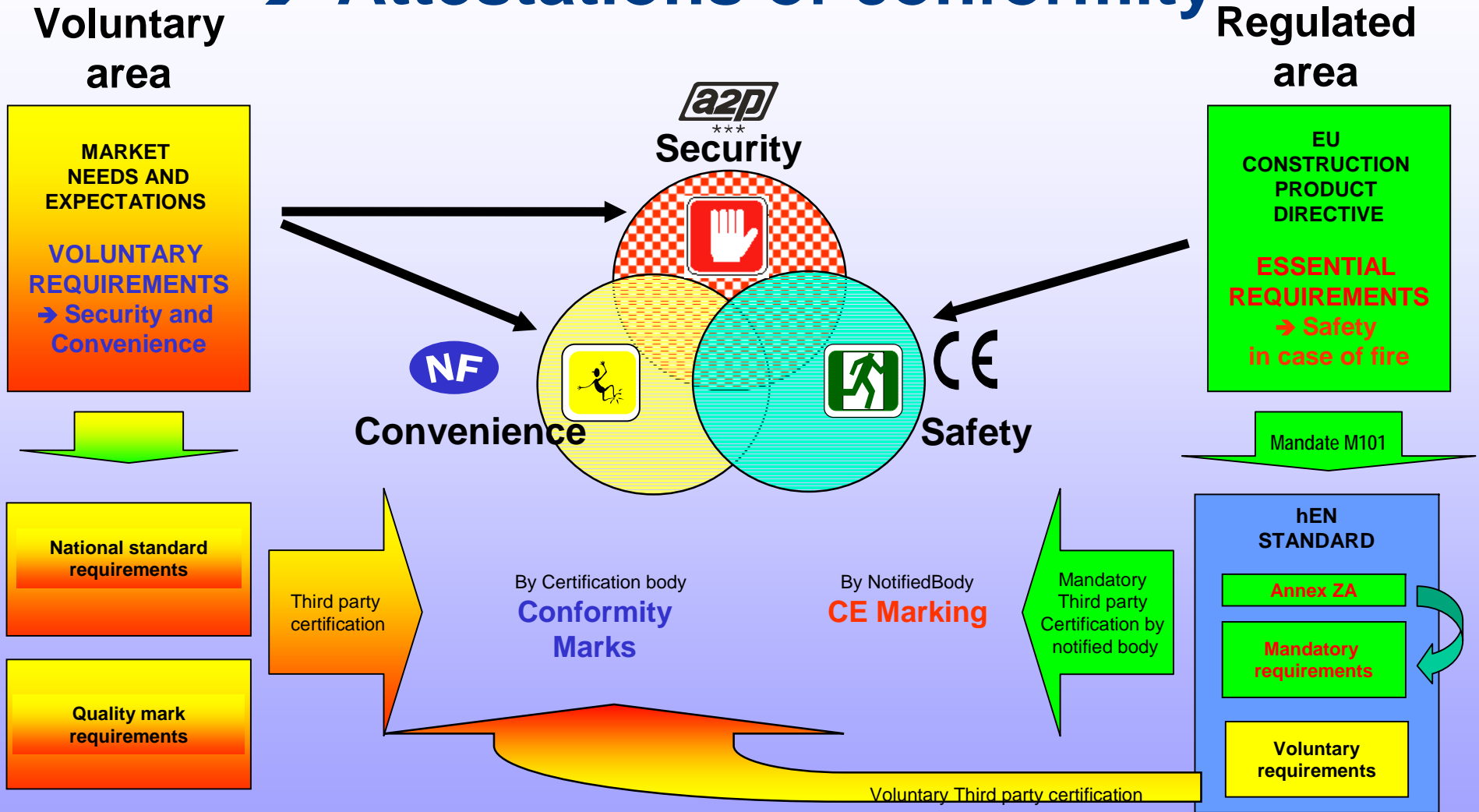
→ Market requirements



➔ Standards requirements



➔ Attestations of conformity



4. Potential consequences

- Low credibility of CE marking
 - New comers with low experience in third party certification
- Unfair competition for Manufacturers and NB's
 - Cost of certification
 - Return on investment
- Confusion with voluntary Conformity marks
- All Door and Hardware Industry is concerned, not only exit devices
 - CE marking is or will be soon mandatory for other products such as hinges, door closing devices, locks, lever handles, etc.
 - Other TG's will have to face the same problems (TG 3, TG 6, TG 7, AHF, etc.)

→ Standards concerned by CE marking

Mandate	Product family	Harmonized product standard	CE marking starts*	CE marking obligatory after
M/101	Doors, windows and related products	ENs 179, Emergency exit devices with bar EN1125, Panic exit devices with handle or push pad EN1935, Hinges EN 1154, Door closing devices EN 1155, Elect hold open devices EN 1158, Door coordinators EN 12209, Locks EN 13241-1, prEN 13633, Elect Panic exit systems prEN 13637, Elect Emergency exit systems	1 Apr 02 1 Apr 02 1 Oct 02 1 Oct 03 1 Oct 03 1 Oct 03 1 May 04 To de defined To de defined	1 Apr 03 1 Apr 03 1 Dec 03 1 Oct 04 1 Oct 04 1 Oct 04 1 Oct 05 1 May 05 To de defined To de defined

To be completed

5. Proposed actions

- Promote conditions of fair competition in a growing global market
 - Harmonization of test methods
 - Revision of EN standards
 - Guidance from SG 06 Group of Notified Bodies
 - propose subjects for Guidance notes,
 - NB's to participate and follow SG 06 decisions
 - Harmonization of Certification procedures
 - Guidance on accreditation
 - Yearly audit by NB's to cover also verification of internal testing of certified products, not only FPC ?
 - Validity of CE certificates identical in each country
 - Surveillance of non conforming products and companies
- ➔ Action: TG's, CEN WG 4, ARGE, Industry National Associations, EU Commission,

5. Proposed actions (Cont'd)

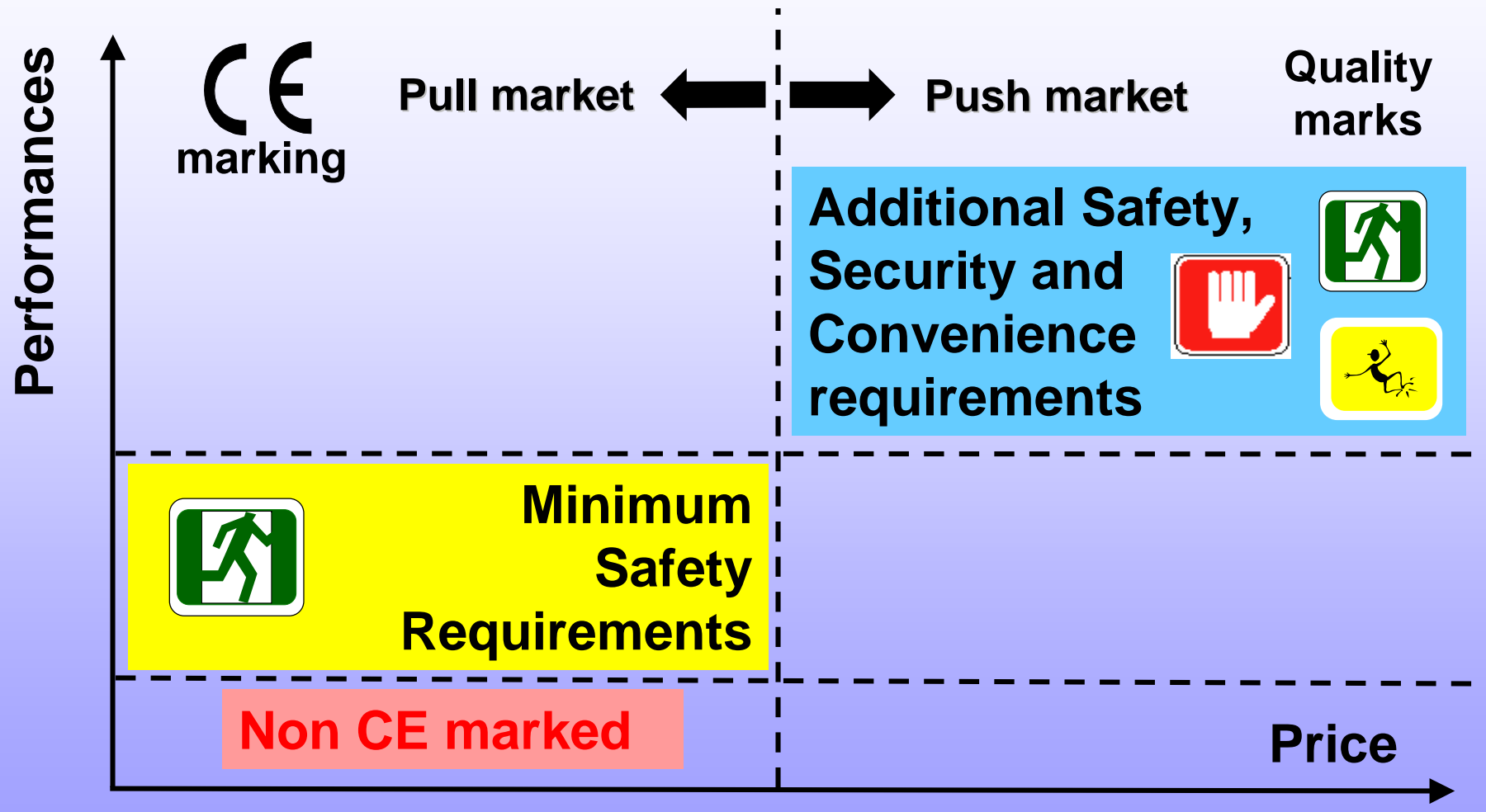
- Use voluntary conformity marks to segment market offer
 - CE marking, to cover minimum safety regulations requirements
 - Conformity marks, to cover additional security and convenience
 - Influence National regulations to guide specifications
 - Guideline for specifiers (EN 1125 and EN 179)
 - Prepare future markets for the European Lock and Hardware Industry
 - WI 33273 Guidelines for the specification of building hardware for the disabled (TG 17)
 - prEN 13633 & prEN 13637 Standards for electrically controlled exit systems (TG 10)
- ➔ Action: TG's, CEN WG 4, ARGE, Industry National Associations,

→ Benefits of Quality Marks

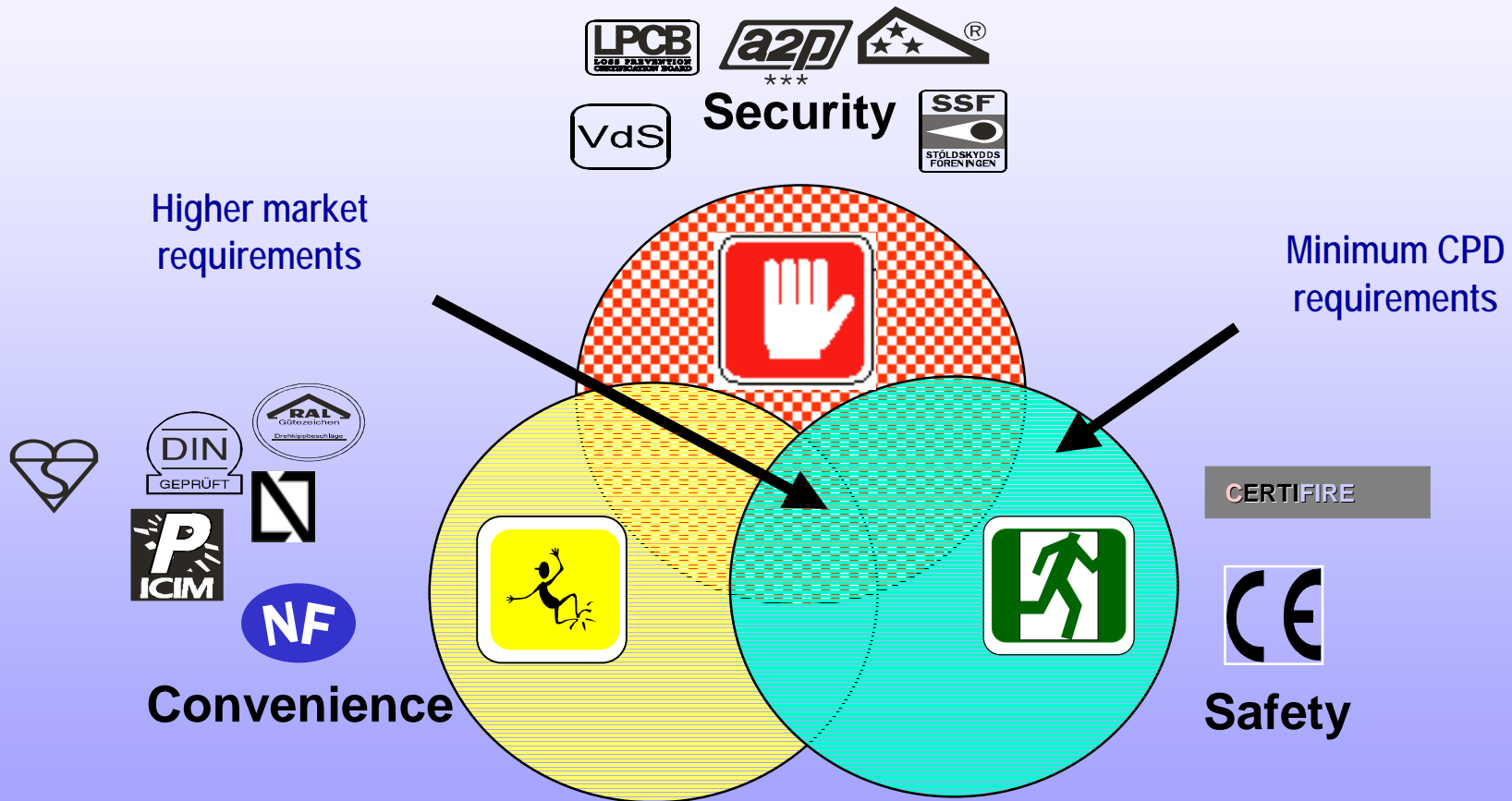
- Locally known
- Cover not only mandatory performances from CPD (e.g. Safety) but also market recognized and useful performances such as Security and Convenience
- Allow for market segmentation
- Opportunity to sell up to a standard rather than down to a price
- Let's use them!

REMINDER

→ Label segmentation



→ Field of application of CE marking and Quality marks





Thank you

