

EuroWindoor request for citation of EN 14351-2: 2019

EuroWindoor thanks the European Commission for the written reply to [our joint position with EDSF and SBS on fire doors and internal pedestrian doorsets](#) in October and the elaborated explanation received at the meeting on the 19 November 2019. Unfortunately the European Commission did not follow the approach to cite the available EN 14351-2 and to extend the co-existence period for EN 16034 before 1 November 2019. This was justified with general legal reasons based on new judgments and too little time required for the formal process. It is the intention to change the existing practice during the current process and to stop harmonisation until new rules apply. Nobody knows how the new rules will look like and when they will appear.

EuroWindoor would like to underline that we believe the decision of the European Commission not to cite EN 14351-2 is a first step towards a distortion of the internal market for internal doors, especially those which meet fire and/or smoke characteristics. It should be solved differently.

The industry has to a large extent used the last couple of years to prepare for the expected CE marking of internal fire doors. With the message that no citation will happen until the standard is updated according to the standardization request being drafted now, no one really believes that CE marking according to a harmonized technical specification will be possible within the next 5 years at the best. It must therefore be expected that some manufacturers in the European market will aim for having their internal fire doors approved via the EOTA route. As this is a costly process it must also be expected that it will only be the bigger manufacturers who will be able to apply for ETA whereas the small and medium size enterprises will need to continue to uphold national certifications in each of the Member States they like to sell their internal fire doors. This will not only create a market distortion, but will also undermine the trust in the European project that this is a project of advantages for all types and sizes of companies.

EuroWindoor who represent both big manufacturers as well as the small and medium sized ones are highly supportive of a well-functioning internal market, but also understands the frustrations our members feel and the actions they feel necessary to take to protect their respective businesses.

With the knowledge of having a sufficient technical content in EN 14351-1 and the experience of a well-functioning CE-marking of external (fire) doors according to EN 14351-1 and EN 16034 EuroWindoor would like to encourage once again the European Commission to reconsider their decision not to cite EN 14351-2 and by that make CE-marking for internal doors possible for all manufacturers on equal terms in European market. EuroWindoor has noted the arguments from the European Commission, but believes in a different way to handle the situation. It would be possible to cite the standard with a note stating that air permeability is not possible to declare until the delegated act is adopted and that the “voluntary” characteristics with no legal requirement in Europe in clause 4.5.2 and clause 4.12 to 4.21 are excluded from the scope of the reference published. Regarding the dated vs. undated references a statement in the citation could be made as it is done in some national legislation like: “References to undated standards are to be used in the version that corresponds to the status at the time the standard was published”.

EuroWindoor is trusting in a workable solution to cite EN 14351-2 now and is willing to support all the efforts in making a better process in the future.

About EuroWindowor AISBL – EuroWindowor 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.



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EU Transparency Register ID Number: 29749561729-18