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Position Paper hinge manufacturers - CE-marking of hinges

We write to you as a strong group of several hinge-manufacturers from different countries in Europe!

We want to make clear our position regarding the revision of the Mandate 101, the deletion of EN 1935 as a harmonised standard, and in general the elimination of hinges from the Mandate 101 itself.

During the past 15 or 16 years the system of CE-marking of hinges has been in place. This system has established itself in the market as the benchmark for safety, especially in working together with the manufacturers of functional doors such as fire resistant or smoke controlled doors. We cannot see any reasons why we should change this system. We would like to ask the commission to continue with CE-marking for hinges!

We, as the manufacturers of hinges and also the door producers have good experiences with CE. Over the years it became a Europe-wide acknowledged market standard. The EN 1935 is also mentioned in several accompanied standards like the EXAP´s EN 15269 or EN 17020 or the EN 179 and 1125. And it is also required in the assessment "ability to release" according to EN 14351-1.

With CE we have a Europe-wide unified and therefore comparable benchmark. It leads to a single comprehensible way of declaration of performance. In its absence, there is the risk that different national or private certification programs could lead to a wide field of unmanageable certification marks. This deregulation process contradicts fundamentally the idea of a free European internal market without trade barriers.

From our point of view a harmonised standard makes sense if it reflects the technical state of the art. For this reason, with reference to EN1935 in particular, we need changes to the standard which was published 17 years ago.
In our opinion it is necessary, and it must be possible, to simplify the standardization process to realise a redraft of the standard with the actual market requirements. Please, note that this aim requires amendments - addition, modification, elimination - of classes and thresholds present in the old standards. E.g., the today´s doors are heavier. Therefore the hinge-manufacturers developed high performance hinges which are not covered by the EN 1935:2002 today.

In view of the future introduction of other CPR essential requirements in Mandate 101, we would also like to remind the need to avoid any undue burden on the manufacturers. In particular, with reference to "Sustainable use of environmental resources", the use of general, "worst-case based" EPDs (Environmental Product Declarations) should be allowed when available, as strongly recommended by the CPR itself (see: Reg. (EU) No. 305/2011, wherein No. 56)

For us it´s not clear why a decision was made for it to be still possible to CE-mark door closing or antipanic devices but not the hinges. Hinges are one of the most critical and important elements for doors on escape routes and also on fire doors. If the hinges fail the door can´t be opened or closed in the case of an emergency. Therefore it is necessary and sufficient to certify these, and only these, hinge types based on AVCP level 1.

For further explanations we would like to offer a date for a meeting in Brussels if helpful.

Looking forward to your statement.

Best regards

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