

With reference to a question posed by a seminar in Brussels, 17.11.2015.

Does the CPR deliver in providing better regulation for fire safety?

SUMMARY

ASDMA completely supports fire safety through fitness for purpose of door products, their design and manufacturing processes. We believe that the CPR helps by raising the profile of fire safety as one of the essential characteristics for products used in construction works. But we also particularly support third party product and installer certification because of its wider scope and more effective fit with the way the market and its supply networks customarily function in the UK.

Concerning the question asked by the Brussels seminar, we conclude that the CPR does not in practice really deliver better regulation for fire safety in the markets at the local level - although the CPR may well be good regulation for the political aim of better defining the European Union.

A single market

The CPR provides a framework of norms to help in shaping the European market as a geographical area without internal frontiers – common processes for a common market.

It concerns the placing of construction products on the EU market. But the CPR and the CE mark, as the mark of conformity, only apply to those particular product types as defined in the applicable harmonised norms. Not all product types are covered. Provisions for fire safety only apply where a declaration is specifically made by the manufacturer covering fire safety characteristics. And assembly, on-site processes and installation are all outside scope.

Product Assurance

There are now two ways to provide additional confidence in the performance of designated timber fire doors with fire resistance and smoke control properties. These are:

- a) CE marked doorsets from a single source taking responsibility for the whole doorset in its entirety, as defined by EN 16034, based on manufacturer declaration backed by a process of independent scrutiny before the product is first made available for sale.
- b) Door assemblies - specified and tested as doorset systems - based on voluntary third party certification of approved door components whilst products are in use in the market, backed by scope of application testing, under the responsibility of manufacturers and the certification bodies.

Limitations and Practical Considerations

Both routes lead to controlled doorsets. But they are not equivalent. The CPR route is limited in its applicability; third party certification (TPC) more adaptable and flexible providing a greater degree of choice in door designs. Both emphasize manufacturer responsibility. TPC includes product auditing and further scope of application testing whilst the product is in the market; the CPR does not. Both routes are valid under building regulations in the UK

Doorset supply from a single source providing all parts in one transaction - and taking all the responsibility - is not the norm in the UK for timber doors. That route does not best fit customary practice in the supply and specification chain; and restriction to that alone significantly distorts the free market. Confusion over the status of the CPR also threatens to undermine existing processes. Most importantly: the CPR is not building regulation; and the CE mark is not designed as a quality mark.