

# Compliance, Standards & CE Marking

## Industrial doors, garage doors, powered gates & barriers

DHF receive numerous requests for clarification over which standard to use for CE marking purposes; the answer depends on the type of system. All powered systems must comply with the Machinery Directive, whilst vehicle access doors must comply with the Construction Products Regulation. Some systems only need to comply with one piece of legislation, others need to comply with both simultaneously.

These entirely are separate pieces of legislation and must be complied with and documented independently. Where both apply (powered doors), the Machinery Directive has the widest coverage and more arduous requirements but can be dealt with by the manufacturer under their own authority, whilst the Construction Products Regulation covers fewer things, but generally requires 3<sup>rd</sup> party involvement for type testing.

### Machinery Directive 2006/42/EC

Commonly referred to as **MD**.

Brought into UK criminal law by the Supply of Machinery (Safety) Regulations 2008.

Applies to all new powered doors, gates, and barriers.

**BS EN 12453:2017** sets the minimum standard for compliance, but there is a problem with this. The standard contains a national foreword that explains that not all areas of MD compliance are fully covered and that users should not rely entirely on this standard for compliance.

*The best solution currently, is to use **DHF TS 011:2019** or **TS 012:2019**, which have been designed to fill in the gaps in legal compliance.*

**Compliance is at the sole responsibility of the legal manufacturer; the company or person who applies the drive units to the door, gate or barrier:**

- i. the factory manufacturer of complete powered systems
- ii. the assembling company when bringing doors, gates and barriers from one supplier, together with power units from another
- iii. the installing company when installing power units to existing manual doors, gates or barriers.

**The legal manufacturer must:**

- risk assess the design (BS EN 12453:2017 +)
- assemble and retain a technical file
- issue a Declaration of Conformity
- issue an operation and maintenance manual
- apply a CE label or plate

More detailed explanations can be found in DHF TS 011:2019 (gates and barriers) and 012:2019 (industrial and garage doors) [here](#).

### Construction products Regulation (EU) 305/2011

Commonly referred to as **CPR**.

Enforced in UK criminal law by the Construction Products Regulations 2013.

Applies to new manual or powered doors within the scope of BS EN 13241 and intended for use in buildings.

**BS EN 13241:2003+A2:2016** sets the standard for vehicle access doors, which in turn requires compliance with some elements of **BS EN 12343:2001** and **BS EN 12604:2000**.

*Although these are withdrawn standards, they are still currently required to be used for CPR compliance purposes because they are dated references in BS EN 13241. This somewhat confusing situation will not be resolved until BS EN 13241 is revised.*

**Declaration of the door's performance by the manufacturer is based on type testing by a Notified Test Laboratory (designated in the UK by MHCLG acting on information from UKAS).**

*Some relaxation of this is available to micro-enterprises and manufacturers of very bespoke/heritage door systems.*

**The responsible person or company, is the one that first places the door on the market:**

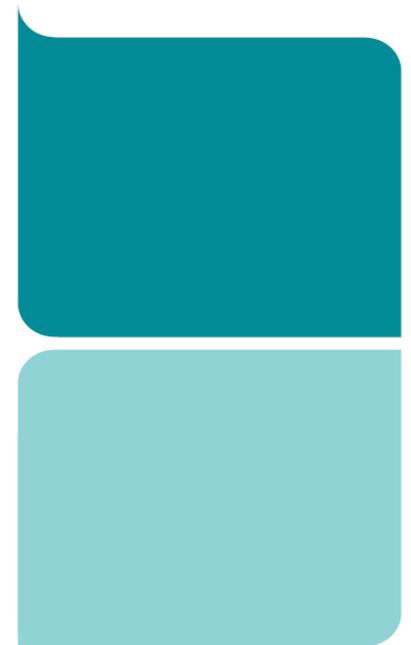
- i. the factory manufacturer of complete doors
- ii. the assembling company when bringing doors from one supplier together with power units from another
- iii. the importer or distributor when importing or distributing door systems manufactured outside the EEA.

**The responsible person or company must:**

- gain type test evidence from a notified test laboratory
- put a factory production control system in place
- assemble and retain a technical file
- issue a Declaration of Performance
- apply a CE label or plate to the door

More detailed explanations can be found in DHF TS 012:2019 [here](#). The CPR also applies to fire resisting shutters; more detail can be found [here](#).

Please note that in the Republic of Ireland, EN standards are published with an IS rather than BS prefix.



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