

- **Which products are covered?**

Currently, mainly external pedestrian doorsets according to EN14351-1 and industrial, commercial, garage doors according to EN13241 are covered. Internal doorsets are not covered by the new rules yet.

- **How long can we wait before we get started?**

Fire doors must be CE marked after 1 November 2019. If you wish to CE mark your doors you must have them tested in accordance with EN1634-1 (smoke doors in accordance with EN1634-3) beforehand and have your factory's production control approved (Factory Production Control, abbreviated to FPC) by DBI Certification A/S who will then be able to issue EC certificates that can form the basis of your CE marking.

Your FPC system must be ready for the initial inspection of the production plant. During the inspection we will cover all the products you wish to have certified and the implementation of your FPC. An approved initial inspection is a prerequisite for you being able to have your products certified so the time frame is partly up to you. It is not dependent upon 1 September 2016, from which date your products can be CE marked.

- **When can we start?**

CE marking cannot start until 1 November 2016 at the earliest but you can start the preparatory work now. This can involve tests or the implementation of your FPC.

- **When do the old Danish classifications become obsolete?**

The old Danish classifications will become obsolete after 1 November 2019.

- **What happens if we are not ready before the transitional period expires?**

When the transitional period expires on 1 November 2019 it will be illegal to put fire doors that are not CE marked on the market.

- **What about tests that have already been carried out?**

It will, of course, be possible to re-use earlier tests that have been conducted in accordance with EN1634-1 or EN1634-3. This is what is known as historical data. However, DBI Certification needs to assess the individual test reports in collaboration with the test laboratory so that we ensure that they meet the requirements of EN16034. Consequently, we cannot be certain that all test reports for tests conducted in accordance with EN1634-1 and EN1634-3 can be re-used. Tests conducted in accordance with the old national standard cannot be re-used for CE marking.

- **Do you also have to CE mark your doors if you will only sell them in your own country (i.e. no exports)?**

All doors with a declared ability to withstand fire can be CE marked after 1 November 2016 and must be CE marked after 1 November 2019. This also applies even if you don't export and only sell in your normal market.

- **What about the Norwegian market, which is of course outside the EU, what is the case there?**

Norway has signed up to the European standard and therefore fire doors must be CE marked in the same way as for the rest of the EU.

- **What do you do in the case of specially manufactured doors that cannot be covered by testing/EXAP and that are constructed for a specific construction project (for example, sliding gates)?**

Please see Regulations (EU) No 305/2011 Article 5.

- **How will it work when you import doors from another manufacturer and then sell them on under your own name?**

In principle, there are two options:

1. Either you carry out your own controls in your own company where you CE mark the doors yourself. This entails controls on your own factory's production control (FPC) by DBI Certification A/S.
2. The manufacturer has a master certificate for the door issued by DBI Certification A/S and you can then enter into an agreement regarding a parallel certificate. The advantage of this is that it is only the manufacturer which has the factory's own production control.

- **What happens when a door leaf is produced in one place and the frame is produced elsewhere within**

**the same company?**

This is dealt with in the factory's own production control (FPC) and assessed in consultation with DBI Certification A/S.

- **What happens when a door leaf is produced in one place and the frame is produced elsewhere by two different companies?**  
This is dealt with in the factory's own production control (FPC) and assessed in consultation with DBI Certification A/S.
- **We produce under licence in accordance with specifications from another company. In that case, are we responsible for the CE marking or are they?**  
It is always the manufacturer who is responsible for CE marking. In EN16034 that is what is referred to as "Cascading" in Section 6.2.4. If cascading is used, the manufacturer is the one who bring the product on the market.
- **Is there any help available for a small company?**  
DBI Certification will be happy to arrange a meeting at which we can guide you on how you can achieve certification in accordance with EN16034. However, in a huge number of cases it will even be possible, together with DBI, to establish an innovation project in relation to some of the necessary measures and, in that way, ensure that you acquire valuable knowledge and co-financing at the same time. (Only for manufacturing in Denmark)
- **Why does there have to be unambiguous identification of the product type on the doors?**  
The unambiguous identification code (number, name etc.) is intended to help identify the door type and compare it with the proper Declaration of Performance (DoP) so that when it is on the market it is always possible to see what the door's performance and declared values are.
- **What is a product family and who defines what should be grouped with what?**  
A product family is a group of products in a product range that can all be certified under the same certificate. It is you, in collaboration with DBI Certification A/S, and your testing institute, who will assess what is optimal in relation to your specific product programme – and any plans for its expansion.
- **What does "ability to release" mean and why is it included?**  
"Ability to release" means the ability to release itself from a hold-open function. If a door is designed to remain open and close when a fire is detected it must be fitted with a release mechanism that is controlled by, for example, an AFDC system. The door shall be tested with this.
- **What does FPC mean?**  
FPC stands for Factory Production Control, also known as self-control. It may comprise a series of procedures, instructions and control forms. The requirements for FPC are described in EN16034, Chapter 6.3.
- **What does "System of AVPC" mean?**  
AVCP stands for Assessment and Verification of Constancy of Performance. It is described in more detail in "Regulation (EU) No. 305/2011, in Appendix 5. EN16034 comes under AVCP system 1. It means that the manufacturer must have:
  1. Factory Production Control - or FPC.
  2. DBI Certification's audit process, including the necessary product tests.
- **What does DoP mean?**  
DoP stands for Declaration of Performance.
- **Should our raw materials also be CE marked?**  
Yes, if they are covered by a product standard. Nowadays, most construction products are covered by a product standard and are therefore CE marked. This applies to, for example, glass, insulation, most sheet materials and many types of

fixtures and fittings. However, there are still areas in which there is no product standard, or where it is in the process of being prepared.

- **Do you need to CE mark the whole door when all the components have already been CE marked?**  
Yes – even if the components have already been CE marked, the fully assembled door must also be CE marked. The components (for example, fittings and fixtures, glass, insulation) etc. must fulfill the requirements stipulated in the product standards that cover them. The fully assembled door is also a product that is covered by performance requirements and therefore must be marked in accordance with EN16034.
- **We produce our own fixtures and fittings. Do they also need to be CE marked?**  
If the fixtures and fittings are marketed as “fixtures and fittings” – then Yes. If the fixtures and fittings on their own are marketed as a fixed component in another CE marked product – then No.
- **We also need to meet other requirements, so do we need to have several CE marks on our doors?**  
No. There only has to be one CE mark on the door. As a basis for this CE marking, documentation proving that the product complies with the relevant requirements – including EN16034 – must also be provided.
- **Doesn't CE just mean “China Export” and are there any controls that apply to CE marking of a door from abroad?**  
The CE marking is a marking and a declaration of one or more specific performance characteristic(s) in accordance with a harmonised European standard.  
In Denmark, the CE marking is controlled by the market controls under the auspices of the Danish Ministry of Energy. This applies to all CE marked goods produced in both Denmark and abroad. If you have any concrete suspicions of fraud this is who you should contact with information and documentation.
- **Is there any requirement for the documentation material to be in English?**  
It is a requirement that your Declaration of Performance declaration is to be submitted in the language(s) required in the member state in which the product is to be made available.
- **Should assembly instructions be prepared in English if we only want to sell the product in Denmark, or which language should be used?**  
The product must be accompanied by user instructions and safety information in a language stipulated by the member state in question and which is easily understood by users.  
For goods sold in Denmark, the language is Danish.
- **What is happening with the national DS certification scheme then?**  
The DS scheme will continue unchanged in the meantime for all DS product types other than fire doors. Any further questions regarding this should be directed to DnV.

## More information



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