

Guidance on the provision of ironmongery for fire and escape doors

1. Any product supplied for sale in the EC must comply with the Construction Products Directive, including requirements for its safety in the case of fire.

2. In the UK, the main legislation for the supply of construction products is the Construction Products Regulations (CPR). This incorporates the Directive into UK law. It requires that there be documentary evidence to show a product's compliance with the CPR.

3. In England and Wales the process of construction is governed by the Building Regulations, although similar requirements exist also for Scotland and Northern Ireland. Building Regulation 7 requires that: -

7. Building work shall be carried out -

(a) with adequate and proper materials which –

(i) are appropriate for the circumstances in which they are used,
(ii) are adequately mixed or prepared, and
(iii) are applied, used or fixed so as adequately to perform the functions for which they are designed; and

(b) in a workmanlike manner.

Some specific advice is given in the case of door closing devices, which seems to indicate that only closers compliant with BS EN 1154 should be used except in certain residential situations. The following extract is from Annexe E of the Approved Document B of the Building Regs: :

Automatic self-closing device A device which is capable of closing the door from any angle and against any latch fitted to the door.

Note: Rising butt hinges which do not meet the above criteria are acceptable where the door is:

- a. to (or within) a dwelling;
- b. between a dwelling house and its garage; or
- c. in a cavity barrier.

(Note that the above applies only to the self-closing attributes of the device: evidence of fire performance is still required. See paragraph 7 below.)

Dwelling A unit of residential accommodation occupied (whether or not as a sole or main residence):

- a. by a single person or by people living together as a family; or
- b. by not more than 6 residents living together as a single household, including a household where care is provided for residents.

Dwelling-house does not include a flat or a building containing a flat.

4. The easiest way of showing compliance with the CPR and Building Regulations is to use CE marked products, wherever and whenever possible. This will affect

All Panic Exit Devices to BS EN 1125•

All• Emergency exit devices (this includes night latches on locked doors on escape routes) to BS EN 179

Hinges on escape route and fire/smoke doors to BS EN• 1935

Door Closing Devices fitted to fire/smoke doors to BS EN 1154•

EM• Hold Open Devices fitted to fire/smoke doors to BS EN 1155

Door• Co-ordinators fitted to fire/smoke doors to BS EN 1158

Note: Any electrically powered or controlled building hardware may also require CE marking under other Directives, such as the Low Voltage Directive or Electromagnetic Compatibility Directive. In such cases the CE marking must also cover the compliance of the product with the Construction Products Directive.

5. Where there is no CE marking scheme for a product, third party testing to a relevant European or British Standard should provide the necessary documentary evidence, as required by Trading Standards, who police the CPR.

6. Where there is no relevant European or British Standard covering the product, the manufacturer/stockist/specifier/supplier must make a judgement as to the product's suitability for its intended purpose, taking into account all relevant factors. These might include door weight/width; frequency of use; accessed by the public etc.

7. Every product should have some sort of fire test evidence if it is to be used on a fire door. This might be a fire test report, an assessment, product certification, or inclusion in the fire door's fixing instructions, issued by the door manufacturer.

8. Until there are some prosecutions and subsequent case law on this subject it is difficult to give black and white advice. However, the Guild offers the following as guidelines for best practice:

In any building accessible to the public, use only CE marked hinges, closers and escape devices. Other products should be third party tested to a relevant BS EN or BS.

Workplaces (e.g. offices, factories, schools, clubs etc (i.e. where anyone is employed) should be treated as above (publicly accessible buildings) to enable employers to fulfil their obligations under Health and Safety at Work legislation.

Domestic/residential accommodation requires approval to be given by Building Control and/or Fire Prevention, though the specialist architectural ironmonger will be expected to give them considered advice. If they make an unwise decision, the AI can be prosecuted for not bringing this to their attention. If relying on an approval given by a BCO or FPO, the AI is advised to make a careful note of the advice, and the person giving it, to keep on file.

Perko/Perkomatic/ Gibraltar type closers seem to be acceptable on interior domestic doors, entrances to individual flats, and places offering residential care, where the sum total of all residents is not more than 6. There is no requirement in the Building Regulations for anything better than rising butts, which the Guild considers potentially dangerous. Simple spring devices are an improvement on rising butts, and there is apparently no evidence to show that use of these types of spring devices has increased the number of lives lost in fires in domestic dwellings.

A new European Standard to cover non-controlled door closing devices is in the very early stages of preparation, and will provide the necessary documentary evidence for these products in the future.

In effect, the specifier/supplier has to make two risk assessments

What is the nature of the risk in the building?

What are the chances of defending a prosecution if low-cost, non-standards-compliant goods are offered? (Remember the requirement for documentary evidence.)

If there are sound reasons, other than low cost alone, for supplying very low-tech products, and it can be argued that the risk to occupants of the building is not increased, then specifiers/suppliers might feel a case could be made for the use of such products. They should be prepared to argue their case in court, if necessary.

Those who wish to err on the side of caution should always offer CE marked products in the situations described above.

A final note of caution: The CPR creates a defence of "Due Diligence" for those cases where a supplier has relied on information provided by someone else, which is precisely the situation in which most Guild members will find themselves. However, in order to maintain this defence you must be able to demonstrate that it was "reasonable" to rely on the information given. Guild members should therefore always ask to see evidence of compliance, (i.e. documentation) to satisfy themselves, within reason, that the claims are valid.