



CEN/TC 33 Secretariat
"Doors, windows, shutters,
building hardware and curtain walling"

"Portes, fenêtres, fermetures, quincaillerie de bâtiment et façades rideaux"
"Türen, Tore, Fenster, Abschlüsse, Baubeschläge und Vorhangfassaden"

CEN/TC 33 N 2159

2008-10-01

CEN/TC 33 Resolution 637c/2008 – Per correspondence

Request for a new extension of the coexistence period for EN 14351-1 of one year.

⇒ Approved

Action : CMC – European Commission

Source : CEN/TC 33 secretariat

Comments : For information to the CEN/TC 33 members



Your correspondent : Nathalie GIRARDOT
ligne directe : +33 (0)1 41 62 86 70
nathalie.girardot@afnor.org

Secretary : Léonie BANATE
ligne directe : +33 (0)1 41 62 86 45
leonie.banate@afnor.org

Secretariat CEN/TC 33

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CEN/TC 33 Resolution 637c/2008

Per correspondence

Issue date: 2008-07-07

Deadline: 2008-09-30

SUBJECT: CEN/TC 33 – Request for a new extension of the coexistence period for EN 14351-1 of one year

RESOLUTION 637c taken by CEN/TC 33 on 2008-09-30

CEN/TC 33, *Doors, windows, shutters, building hardware and curtain walling*

requests a coexistence period of 36 months (instead of 24 months already agreed) for the product standard for windows and external doors EN 14351-1+A1;

Justification: It is essential that the CE marking apply on the EN 14351-1 including its amendment.

The primarily adds detail to previous clauses dealing with Evaluation of Conformity. The intention is to facilitate consistent interpretation particularly when addressing the possibilities of cascading ITT.

The amendment of the standard EN 14351-1: 2006 has request more time to obtain an agreement from a large majority of the interests parties without neglect the time loss by the previous CEN CPD consultant.

It is thus requested to allow 36 months of coexistence period in order to ensure that SME manufacturers as well as large manufacturers have enough time to prepare for CE-marking of windows and doors in accordance with EN 14351-1: 2006 + A1: 2008/2009.

decides to request for a new extension of the coexistence period for EN 14351-1 of one year.

The decision was taken *with 12 positive votes, 4 negative votes and 2 abstentions.*

For information, result by weighted vote:

- with all members : 81 %
- with EEA members only : 85 % (all except Switzerland)

Conclusion :

The request for an extension of one year of the co-existence period was approved. This resolution was sent to the CMC for the European Commission for acceptation.

The Preparatory Group meeting on the 8th of October will be discussing the issues concerning co-existence periods for the harmonized product standards.



Your correspondent : Nathalie GIRARDOT
ligne directe : +33 (0)1 41 62 86 70
nathalie.girardot@afnor.org

Secretary : Léonie BANATE
ligne directe : +33 (0)1 41 62 86 45
leonie.banate@afnor.org

CEN Member countries	Resolution 637c/2008		
	Support	Disagree with draft resolution	Abstain/ no interest
AUSTRIA (ON)	X		
BELGIUM (IBN)		X*	
BULGARIA (BDS)			
CYPRUS (CYS)			
CZECH REPUBLIC (CNI)	X		
DENMARK (DS)		X*	
ESTONIA (EVS)			
FINLAND (SFS)	X		
FRANCE (AFNOR)	X		
GERMANY (DIN)			X
GREECE (ELOT)	X		
HUNGARY (MSZT)	X*		
ICELAND (IST)			
IRELAND (NSAI)			
ITALY (UNI)	X		
LATVIA (LVS)			
LITHUANIA (LST)			
LUXEMBOURG (SEE)			
MALTA (MSA)			
NETHERLANDS (NEN)		X*	
NORWAY (SN)	X		
POLAND (PKN)			
PORTUGAL (IPQ)	X		
ROMANIA (ASRO)	X		
SLOVAKIA (SUTN)			
SLOVENIA (SIST)			
SPAIN (AENOR)			X
SWEDEN (SIS)	X		
SWITZERLAND (SNV)		X*	
UNITED-KINGDOM (BSI)	X		
	12	4	2
Total of voting	18		

* with comments

Template for comments and secretariat observations

Date:	Document:
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1	2	(3)	4	5	(6)	(7)
MB¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of com- ment²	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

CH			ge	<p>We do not support the draft resolution 637/2008 due to following reason:</p> <p>The request of a new extension of the coexistence period is against all efforts which were made by many manufacturers up to now to be ready in time. The European window and door sector will be ready for CE marking until 1st February 2009. There are many appropriate solutions for industrial and hand craft manufacturing available. The request gives a wrong sign for the future. It helps only the manufacturers which did not care about the preparation on time. A further extension of the coexistence period for 1 year will not give any pressure to those manufacturers, which did not do their homework up to now and the situation will be the same in one year as today.</p>		
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DK			Ge, te	- At Formal Vote in the autumn 2005, the Standard EN 14351-1:2006 was approved with a sweeping majority (0 negative votes, 3 abstentions). In order to give manufactures and test laboratories adequate time to prepare for the Standard, the CEN/TC 33 commission requested a 2 year transition period (as opposed to the normal 1 year transition period), cf. the CEN/TC 33 resolution 402/2005. The request was met, cf. OJEU 13.12.2006, C 304. An unfounded postponement would undermine the respect for the CE marking and would be unfair to those manufactures, who have faced increased expenses in order to be able to introduce the CE marking no later than 1 February 2009.		
DK			Ge,te	- EN 14351-1:2006 is a first generation harmonised standard, which according to CEN rules must be reviewed in 2011. In connection with this, it is important to benefit from the practical experiences with the obligatory CE marking, which should have been in effect as long as possible.		

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DK			Ge,te	- EN 14351-1:2006/prA1:2008 does not make new or changed demands on the manufactures. On the contrary, new options make it in some respects easier for the manufactures on certain points. A possible approval of EN 14351-1:2006/prA1:2008 can therefore not give grounds for a prolongation of the transition period of EN 14351-1:2006.		
IBN				We disagree because a lot of companies have made efforts to prepare for the coming CE marking of windows and doors (that will be obligatory in feb. 2009). Extending this period for one year at a moment so close to the end of coexistence period, would affect credibility of the CE marking.		

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MSZ T	7.2.5.1			In case of cascading ITT – when a manufacturer uses an assembly designer’s / system house’s / ITT for his CE-marking - we suggest to require a checking, named “comparing laboratory test” for one structure from actual manufacturer. It should be performed by a national Notified Body.	Justification: On the basis of the several tests (approximately 600) which were performed for windows and doors in Hungary in the last three years, we have that experience that performance characteristics classes (air permeability, water tightness, win load) of structures made by manufacturers – in spite of use of same components are provided or suggested by system house / assembly designer – in numerous cases are significantly unfavourable than results of system house/designer’s tests.	
MSZ T	7.3.6			Frequencies of product testing are made by manufacturer according to his test plan should be determined exactly. Our suggestion: once a year.		
NEN				1. The amendment to the A1 is not really difficult and should not need much extra time to be realized. 2. Extension of the coexistence period makes the efforts done by so many manufacturers virtually obsolete for one year. The danger is setting a bonus on not trying to comply on tim		