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EU Transparency Register: 57596413786-53

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Brussels, 1 September 2016

**Re: standardisation request to the European Committee for Standardisation as regards balustrade kits and railing kits**

Dear Sir,

EMU, the European organisation representing small and medium-sized companies operating in the metalworking sector would like to address you its concerns with regard to the standardisation request to the European Committee for Standardisation as regards balustrade kits and railing kits.

EMU, familiar to the standardisation procedure, is aware of the importance of the preparatory work for standardisation. In our opinion, the Commission should use this preparatory phase to enrich its understanding of the topic with feedback from the stakeholders. Therefore we invite you to consider the following points:

**Mandate title:**

The mandate should not only cover kits (e.g. metal frame + glass pane) but also balustrades and railings. Balustrades are mainly individually manufactured and installed in a single identified construction work.

**Legislation scope:**

Balustrades in general are covered by different legislations: construction, civil engineering works as well as EN ISO 14122-3 (machinery directive). Therefore, the mandate should be specifically limited to the balustrades covered by the construction legislation (CPR).

**Edge protection:**

Balustrades in the sense of "edge protection" to prevent from fall are a subset of all conceivable balustrades. A limitation on "edge protection" would help to make the scope of the mandate more manageable. Only for these balustrades applies Basic Requirement 4 (and/or 1).

Fences, grids and other types of railings which have the purpose of encircling something or sealing it off are outside the consideration/scope.

In addition, the word balustrade encompasses very different products. „Railing“ translated into different European languages means fence, ship's rail, grid. These items do not belong to the concept of balustrades designed for construction. Then horizontal loads (0,5, 1,0 or 2,0 kN/m) according to EN 1991-1-1 do not have to be considered either. A static calculation is therefore not necessary.

**Number of balustrade standards:**

Balustrades (made from steel or aluminium) mostly consist of post, handrail and filling. The filling can be chosen in different materials. Therefore the variety of versions according to design, materials and dimensions is extremely high. That leads to the question if we actually need seven European Standards for balustrades. We propose instead to address all regulatory provisions in one single and harmonized European Standard.

**AVCP-System:**

System 3 is proposed. During the AdGC-meeting, system 2+ for public buildings and 4 for private housing were discussed.

The differentiation would be profitable to SMEs as it would mean simplification and would help them to consider the different requirements of loads (Eurocode: in private housing: 0,5 kN/m horizontal loads, public areas: 1,0 or 2,0 kN/m horizontal loads; other countries: in private housing: 0,8 kN/m horizontal loads, public areas: 1,6 or 3,0 kN/m horizontal loads).

System 3 has the big disadvantage that because of the high variety of product types, a great amount of "type testing" is necessary. That would increase administrative and financial efforts.

Moreover companies/enterprises who are manufacturer of balustrades also manufacture load-bearing constructions such as carports, canopies and winter gardens which makes a certification according to EN 1090-1 (system 2+) necessary.

If these companies would have to perform type testing for balustrades in system 3 too, that would finally lead to system 1: that means bureaucratisation and double testing and additional costs for the manufacturer. Only very few companies solely manufacture balustrades.

Considering all these aspects, we propose system 2+ for all applications.

**Performance characteristics:**

The essential characteristic "Maximum dimension of openings" can be understood under "Children protection measures" and should therefore be incorporated in the "Children protection measures".

With regard to heights, maximum dimension of openings and/or children protection measures, even within several EU countries, rules differ. It would be long and difficult to achieve the harmonization of the different regulations.

We remain available for any supplementary comments you would require.

Yours Sincerely,



Eric DRESIN  
General Secretary