



ASFP TECHNICAL GUIDANCE DOCUMENT 21

UKCA / CE Marking of Operable Fabric Curtains

Association for Specialist Fire Protection

Spectra House, Westwood Way, Westwood Business Park, Coventry, CV4 8HS

Tel: +44 (0) 247 693 5412 Email: info@asfp.org.uk

1. CE marking with respect of fire resistance performance

The CE marking of operable fabric curtains with regards to fire resistance performance is based on the harmonised product standard BS EN 16034:2014. CE marking should be applied in instances where the scope of BS EN 16034:2014 applies. CE marking of operable fabric curtains that are within the scope of BS EN 16034:2014 became mandatory under European Union Construction Product Regulations (CPR) from 01 November 2019.

BS EN 16034:2014 is entitled “*Pedestrian doorsets, industrial, commercial, garage doors and openable windows — Product standard, performance characteristics — Fire resisting and/or smoke control characteristics.*”

Its scope covers “*safety and performance requirements applicable to all fire resisting and/or smoke control products intended to be used in fire and/or smoke compartmentation and/or escape routes, which are either:*

- *industrial, commercial and/or garage doorsets, rolling shutters or operable fabric curtains intended for the installation in areas in the reach of persons and for which the main intended uses are giving safe access for goods and vehicles accompanied or driven by persons, or*
- *rolling shutters or operable fabric curtains used in retail premises which are mainly provided for the access of persons rather than vehicles or goods, or*
- *pedestrian doorsets and/or openable windows and/or inspection hatches which are hinged or sliding, intended for the installation in areas in the reach of persons, and for which the main intended uses are giving safe access for persons.”*

The scope statement above clearly covers operable fabric curtains, but only in a limited number of circumstances – which in terms of personal access / egress is limited to the use of Vertical curtains in retail premises. Therefore, the vast majority of operable fabric curtains fall outside the scope of BS EN 16034:2014. Horizontal curtains / curtains protecting external windows, curtains replacing sections of wall to allow an open plan design etc. are clearly outside the scope of BS EN 16034:2014, and as such do not need to be CE marked to comply with Construction Product Regulations.

2. CE Marking Combination Standards

CE Marking to BS EN 16034:2014 can only be undertaken in combination with either BS EN 14351-1:2006 + A2:2016¹ or BS EN 13241:2003 + A2:2016². Neither BS EN 14351-1:2006+A2:2016 or BS EN 13241:2003+A2:2016 identify Operable Fabric Curtains within their scopes, unlike BS EN 16034:2014, and as such this matter created confusion within the marketplace.

Guidance was sought in 2018 from GNB-CPR-SG06³, who determined at the 19th meeting of SG06 in November 2018, that it is possible to CE mark Operable Fabric Curtains with BS EN 16034:2014 only in combination with BS EN 13241:2003+A2:2016.

1. EN 14351-1:2006+A2:2016 - Windows and Doors. Product standard, performance characteristics. Windows and external pedestrian doorsets
2. EN 13241:2003+A2:2016 - Industrial, commercial, garage doors and gates. Product standard, performance characteristics
3. SG06. Guidance from the Group of Notified Bodies for the Construction Products Regulation for door and windows. 305/2011/EU

At the time of writing this note in September 2023, EN 13241 is undergoing systematic review by the relevant CEN committee (CEN TC33 WG5 is the responsible committee). Approaches have been made to the committee asking for changes to that standard as appropriate to the use in conjunction with Operable Fabric Curtains. We understand that the drafting committee currently does not think it appropriate to use EN 13241 as a complimentary standard to CE mark Operable Fabric Curtains. This situation will hopefully become clearer once the new version of EN 13241 is published.

3. Machinery Directive

Manufacturers and, where relevant, installers of Active Fire Curtains must meet the requirements of the Supply of Machinery (Safety) Regulations 2008/Machinery Directive, subsequently modified by The Product Safety and Metrology etc. (Amendment etc.) (EU Exit) Regulations 2019, No. 696, as they apply to machinery, by:

- Manufacturers and where relevant installers, before they place on the market, or put into service for the first time, for each new Active Fire Curtain, affixing the CE or UKCA marking visibly, legible and indelibly, as well as,
- give the name and address of the person responsible (manufacturer and any authorised representative, if any, or installer as manufacturer) adjacent to the CE marking, and
- provide to the end-user a Declaration of Conformity (DoC) and Instructions for the installation, use and maintenance of the product, in the language of the end-user.
- Also, compile, retain, and make available when requested by a European market surveillance authority, a technical file that shows how all of the relevant essential health and safety requirements have been met to the 'state of the art', and where products are made in series, measures to ensure continued conformity, and
- in doing so they can choose to meet these requirements by the use of standards, which if harmonised, and followed in full, may give a 'presumption of conformity'.

For more details on the application of the Machinery Directive to Operable Fabric Curtains, please see ASFP Advisory Note 25.

4. Transition to UKCA

The provisions of the European CPR were transferred into UK law when the UK left the European Union by the Construction Product (Amendment etc.) (EU Exit) Regulations 2020. Harmonised European standards such as BS EN 16034:2014 became designated British standards.

The mandatory requirement of marking under the European Construction Product Regulations therefore remains in UK after 1st January 2021. Operable fabric curtains that are placed on UK market for an application that is within the scope of BS EN 16034:2014 are therefore now required to carry either a CE mark or a UKCA mark in respect of their fire resistance performance. The latest Government advice is that from 1st July 2025, only the UKCA mark will be the appropriate marking for operable fabric curtains that fall under the

scope of construction product regulations (as identified by BS EN 16034:2014) and are placed on the GB market. Separate rules exist for Northern Ireland.

Installed operable fabric curtains will also be covered by other regulations, such as the Machinery Safety Regulations, the LVD or EMC Directives. At the time of writing, the Machinery Directive requires that all operable fabric curtains are CE or UKCA marked as appropriate. The recognition of CE marking in respect of the Machinery Directive was proposed to end on 31st December 2024. However, after the Department for Business and Trade announcement on 1st August 2023, it now appears that CE marks will be indefinitely acceptable to meet legal requirements of the Machinery Directive

5. BS 8524-1

As already stated, the vast majority of operable fabric curtains fall outside the scope of BS EN 16034:2014. As such the legal requirement to CE mark / UKCA mark is not relevant, and another product standard can be considered.

BSI currently publishes two further standards for this market sector, BS 8524-1:2013 *“Active Fire curtain barrier assemblies – Part 1: Specification”* and BS 8524-2:2013 *“Active Fire curtain barrier assemblies – Part 2: Code of Practice for application, installation and maintenance.”*

Whilst these standards are currently under review by BSI, it should be stated that they are not withdrawn, nor is their withdrawal proposed. The BS 8524 series is also currently referenced in the BS 999x series, and ASFP is not aware of any intention to remove these references.

The ASFP black book discusses the testing required in BS 8524-1:2013 in more detail. Much of the testing is identical to that needed to comply with BS EN 16034:2014, notably the fire testing to BS EN 1634-1:2014 +A1:2018 *“Fire resistance and smoke control tests for door and shutter assemblies, openable windows and elements of building hardware – Part 1: Fire resistance test for door and shutter assemblies and openable windows”*.

However, there are a couple of elements required for BS 8524-1:2013, which are not part of the normal scope of BS EN 16034:2014. These include the requirement for the curtain to be operated for a number of cycles prior to fire resistance testing, and BS 8524-1:2013 Annex G – the “Hot Motor Operation Test”.

In light of the above, it should also be noted that BS EN 16034:2014 contains a national foreword which states –

“Users’ attention is drawn to the fact that fabric curtains tested in this standard only apply to the fire door sets fire test. This standard does not cover their operation deployment speeds, initiation devices or warning devices, etc. and as such should comply with BS 8524-1 and BS 8524-2.”

Therefore, ASFP would point out that BS EN 16034:2014 and BS 8524 are not conflicting standards, but complimentary standards. It is recommended that where compliance with BS EN 16034:2014 is mandated, this should still be augmented with certification to BS 8524-1 and BS 8524-2.

6. Extension of Scope

BS EN 1634-1:2014 +A1:2018 contains a series of direct field of application rules in explaining how test results can be used. These rules include a number of parameters including extension of size up to a maximum of 10% from that tested. That is the limit which can be used without any further consideration.

"Where it is mandatory for products to be CE/UKCA Marked to meet CPR requirements, any extension of scope must be in the form of a formal Extended Application, in line with a published extended application standard.

If the application for the curtain is in scope of BS EN 16034:2014, and uncertainty regarding EN 13241 is resolved, then the only possible extension of scope beyond the direct field of application of BS EN 1634-1:2014 +A1:2018 would need to be in accordance with BS EN 15269-11:2018 *"Extended application of test results for fire resistance and/or smoke control for door, shutter and operable window assemblies, including their elements of building hardware Part 11: Fire resistance for operable fabric curtains"*.

BS EN 15269-11:2018 contains rules by which certain parameters of curtain design may be amended, including curtain size extension. An Extended Application report (EXAP) to BS EN 15269-11 should be conducted in line with the principles laid down in BS EN 15725:2023 *"Extended application on the fire performance of construction products and building elements: Principle of EXAP standards and EXAP reports"*.

However, if the Active curtain is not within the limited scope of BS EN 16034:2014, then clauses within BS 8524 concerning "full technical appraisal/further assessment" (see C.1.2, BS 8524-1: 2013) can be used to justify changes to the tested design, such as increases in size, change in supporting construction, reveal / face fixing etc.

7. Summary

The following table summarises the text above.

Scope	Vertical curtains in retail premises used for personal access / egress	All other operable fire curtains
CE Marking	Legal requirement to declare fire resistance performance in accordance with BS EN 16034:2014 in combination with BS EN 13241:2003 + A2:2016 to meet Construction Product Regulations until 30/6/25. Also, Legal requirement for Machinery Directive (indefinitely)	Legal Requirement for Machinery Directive (indefinitely)
UKCA Marking	Can be used in place of either CE mark for CPR or Machinery Directive purposes. Must be used in place of CE mark for CPR requirements (from 1/7/25 onwards)	Can be used in place of CE mark for Machinery Directive purposes.
BS 8524-1:2013	ASFP recommend certification to BS 8524-1 in conjunction with above marking.	ASFP recommend certification to BS 8524-1.
Fire resistance performance	Given Legal requirement above, should be classified to BS EN 13501-2:2018, based on testing to BS EN 1634-1	Can be shown by testing to BS EN 1634-1 or BS 476-22 until such time as the BS 476 series is withdrawn from Approved Documents / BS 8524 series
Extension of Scope	Can be done in line with BS EN 15269-11:2018, in accordance with BS EN 15725:2023.	Can be done in line with BS 8524-1:2013

Disclaimer

©2023 Association for Specialist Fire Protection – All Rights Reserved.

This publication and its content are the copyright of the Association for Specialist Fire Protection © (Company number 01292282) (“ASFP”) 2023. ASFP is the owner or the licensee of all intellectual property rights in this publication, and in the material published in it. These works are protected by copyright laws and treaties around the world.

To view the full ASFP Copyright and Disclaimer statement(s), please view via the link: <https://asfp.org.uk/disclaimer/>