

**STELLUNGNAHMEN
UND DAS ERGEBNIS DER BERATUNG DURCH DAS KOMITEE 227
" Türen, Tore, Fenster, Abschlüsse, Baubeschläge und Vorhangfassaden
"**

**NORM-ENTWURF – ÖNORM EN 12453/prA1:2019-07
"Tore - Nutzungssicherheit kraftbetätigter Tore - Anforderungen und
Prüfverfahren (Änderung)"**

Medieninhaber und Hersteller

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Template for comments and secretariat observations

Date: 16.07.2019	Document: EN 12453:2017/prA1:2019	Project:
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MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
Komitee 227		4.1	para 4 and last para	te	<p>“The severity and probability of risk increases when:“</p> <p>.....</p> <p>It must also be considered: “The severity and probability of risk decreases when:“</p> <ul style="list-style-type: none"> - non-automatic operated domestic garage doors are used for one household only and do not protrude onto a public access area (as is in the standard) but also when - contact with the door requires intentional but clearly forbidden activity <p>EN 16005 4.6.1 a) states that in the case of doors which, unlike doors in EN 12453, are used by persons only, hazard points are not considered as such if any contact requires an intentional activity.</p> <p>Risk analysis:</p> <p>Analogous to EN 13849 "Safety of machinery - Safety-related parts of control systems", the extremely low risk is to be stated on the basis of the probability of personal injury due to barriers.</p> <p>A survey of incidents and personal injuries with barrier strikes in commercial garages with a sample far greater than 50% of the total market, related to one year, showed:</p>	<p>It must also be considered: The severity and probability of risk decreases when:</p> <ul style="list-style-type: none"> - non-automatic operated domestic garage doors are used for one household only and do not protrude onto a public access area - contact with the door requires intentional but clearly forbidden activity 	<p>Stellungnahme des nationalen Spiegelgremiums Komitee 227 zum CEN/TC 33</p>

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2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

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					<p>"The probability of personal injury in commercial garage operations is $5.8 \cdot 10^{-9}$ (sample > 50%)"</p> <p>Dangerous area:</p> <p>Pedestrian areas are clearly signposted and are basically separated from the driving area. If driveways are adjacent to footpaths, structural separation, e.g. through a railing.</p> <p>Trade inspections</p> <p>In addition, commercially operated garages are subject to inspection by the trade authority. In these reviews, there have never been any complaints regarding the neglect of personal protection</p>		
Komitee 227	prA1) 5	Modification to 4.2.1	4 th indent	te	<p>Other surfaces, e.g. the ground, should be taken into consideration</p> <p>This statement is completely non-specific and therefore not suitable in a standard</p>	Delete the sentence	Stellungnahme des nationalen Spiegelgremiums Komitee 227 zum CEN/TC 33
Komitee 227	prA1) 8	Modification to 5.1.2	Para 3	te	... should	shall	Stellungnahme des nationalen Spiegelgremiums Komitee 227 zum CEN/TC 33
Komitee	prA1) 9	Modification to 5.1.3	para4	te	The presence of vulnerable persons can not be ruled out by any manufacturer	To be deleted	Stellungnahme des nationalen

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227					<p>with complete certainty. However, accidents that cause harm to children, as well as a fatal accident involving two adults, have only happened at doors to our knowledge, which in no way complied with the standards that were valid until now. The proposed text is therefore going too far, that's gold-plating.</p> <p>Risk analysis:</p> <p>Analogous to EN 13849 "Safety of machinery - Safety-related parts of control systems", the extremely low risk is to be stated on the basis of the probability of personal injury due to barriers. A survey of incidents and personal injuries with barrier strikes in commercial garages with a sample far greater than 50% of the total market, related to one year, showed: "The probability of personal injury in commercial garage operations is $5.8 \cdot 10^{-9}$ (sample > 50%)"</p> <p>Dangerous area:</p> <p>Pedestrian areas are clearly signposted and are basically separated from the driving area. If driveways are adjacent to footpaths, structural separation, e.g. through a railing.</p>		Spiegelgremiums Komitee 227 zum CEN/TC 33

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					<p>Trade inspections</p> <p>In addition, commercially operated garages are subject to inspection by the trade authority. In these reviews, there have never been any complaints regarding the neglect of personal protection</p>		
Komitee 227	prA1)9	5.1.3	Table 1			<p>Add a column under "type of use" with the following text:</p> <p>Type 0 - Trained users – (public prohibited – area separated) –</p> <p>Hold-to-run control mode of operation - not applicable</p> <p>Impulse activation in sight of the door – C or E</p> <p>Impulse activation out of sight of the door – C or E</p> <p>Automatic control – C or E</p> <p>Type 0: A limited group of persons are trained to use the door. For pedestrians prohibited and spatially separated.</p>	Stellungnahme des nationalen Spiegelgremiums Komitee 227 zum CEN/TC 33

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						<p align="center">Table 1 — Minimum levels of safeguarding at main edge</p> <table border="1"> <thead> <tr> <th>Type of door activation</th> <th colspan="4">Types of use</th> </tr> </thead> <tbody> <tr> <td></td> <td>Trained users - (public prohibited - area separated) Type 0</td> <td>Trained users (public not likely to be present) Type 1</td> <td>Trained users (public likely to be present) Type 2</td> <td>Untrained users Type 3</td> </tr> <tr> <td>Hold-to-run control mode of operation</td> <td>Not applicable</td> <td>A</td> <td>B</td> <td>Not possible</td> </tr> </tbody> </table>	Type of door activation	Types of use					Trained users - (public prohibited - area separated) Type 0	Trained users (public not likely to be present) Type 1	Trained users (public likely to be present) Type 2	Untrained users Type 3	Hold-to-run control mode of operation	Not applicable	A	B	Not possible	
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						<table border="1"> <tr> <td>Impulse activation in sight of the door</td> <td>C or E</td> <td>C or E</td> <td>C or E</td> <td>C and D, or E</td> </tr> <tr> <td>Impulse activation out of sight of the door</td> <td>C or E</td> <td>C or E</td> <td>C and D, or E</td> <td>C and D, or E</td> </tr> </table>	Impulse activation in sight of the door	C or E	C or E	C or E	C and D, or E	Impulse activation out of sight of the door	C or E	C or E	C and D, or E	C and D, or E	
Impulse activation in sight of the door	C or E	C or E	C or E	C and D, or E													
Impulse activation out of sight of the door	C or E	C or E	C and D, or E	C and D, or E													
Komitee 227	prA1) 13	Modification to 5.2.3		te	... that a person cannot be touched by a moving door leaf. In 4.2.3 the Standard deals with the hazard IMPACT. 5.2.3 is "Safeguarding against impact hazard" The proposed text is therefore going too far.	... that a person cannot be bumped.	Stellungnahme des nationalen Spiegelgremiums Komitee 227 zum CEN/TC 33										
Komitee 227	prA1) 23			ge	"Health and safety related instructions shall be provided in paper form; all other instructions can be provided either in paper or electronic form or a link to a webpage (or similar) where the information can be found."	Change into: "Health and safety related instructions shall be provided in paper form; All other instructions (including health and safety related instructions) can be provided either in paper or electronic form or a link to a webpage (or similar) where the information can be found."	Stellungnahme des nationalen Spiegelgremiums Komitee 227 zum CEN/TC 33										

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					Explanation: Environmental consideration can lead to no other proposal. It is ridiculous, to send physical paper in the year 2019, unless the customer asks for it. Most customers don't want papers...		
Komitee 227		New chapter		te	<p>The testing of durability has to be integrated in this standard, as in the moment it is found nowhere (it was in EN12605:2000 and got lost during the merging of EN12604+EN12605) . Testing of durability is necessary eg. in Germany because of building regulations.</p> <p>So long as this chapter is not integrated in this standard, other standards (EN eg. EN16034) have to refer to the old version EN12605:2000.</p>	<p>Add chapter 4.1 and 5.2 from EN 12605:2000</p> <p>Add chapter "direct application" The direct application of EN 1634 shall apply.</p> <p>Add The test shall be performed with the largest and heaviest variation of the particular product type. Therefore, the product's performance is also applicable to smaller and lighter variations of the product.</p>	Stellungnahme des nationalen Spiegelgremiums Komitee 227 zum CEN/TC 33

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