ENVIRONMENTAL PRODUCT DECLARATION

as per ISO 14025 and EN 15804

Owner of the Declaration ARGE; European Federation of Associations of Lock and Builders

Hardware Manufacturers

Publisher Institut Bauen und Umwelt e.V. (IBU)

Declaration number EPD-ARG-20160183-IBG1-EN

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Issue date 14.09.2016 Valid to 13.09.2022

Door closers

ARGE; European Federation of Associations of Lock and Builders Hardware Manufacturers

(This EPD is valid only for products supplied by an ARGE EPD licence holder)



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1. General Information

ARGE Door closers Programme holder Owner of the Declaration IBU - Institut Bauen und Umwelt e.V. ARGE; European Federation of Associations of Lock and Builders Hardware Manufacturers Panoramastr. 1 Offerstraße 12, 42551 Velbert 10178 Berlin Germany Germany **Declaration number Declared product / Declared unit** EPD-ARG-20160183-IBG1-EN 1 kg of door closer This Declaration is based on the Product Scope: **Category Rules:** This ARGE EPD covers door closing devices designed to control the closing action of a door. The reference Building Hardware products, 02.2016 product used to calculate the impact this product group (PCR tested and approved by the SVR) has on the environment is a door closer composed primarily of steel, aluminium and zinc-based alloy and Issue date has been selected for the LCA (Life Cycle 14.09.2016 Assessment) because it is the product with the highest impact for 1 kg of product. A validity scope analysis Valid to has also been carried out to determine the limiting 13.09.2022 factors for door closing devices covered by this EPD. In a preliminary study (simplified LCA), it has been confirmed that this EPD represents the worst case condition and it can therefore be used to cover all door closing devices manufactured in Europe by ARGE member companies. The owner of the declaration shall be liable for the underlying information and evidence, but the ARGE programme holder (IBU) cannot be held responsible for manufacturer's information, life cycle assessment data or evidence Verification Wermanes The CEN Norm /EN 15804/ serves as the core PCR Independent verification of the declaration according to /ISO 14025/ Prof. Dr.-Ing. Horst J. Bossenmayer internally externally (President of Institut Bauen und Umwelt e.V.)

2. Product

Dr. Burkhart Lehmann (Managing Director IBU)

2.1 Product description

This EPD refers to door closer and door coordinator devices used to control the closing action of a door.

2.2 Application

These products are designed to be integrated into door assemblies of varying materials and applications. Their purpose is to control the closing action of the door. They may be used for either interior or exterior doors.

2.3 Technical Data

Ideally, products should comply with a suitable technical specification. /EN 1154/ and /EN 1158/ are examples of such specifications and some products will comply with these. The relevant grading structure for /EN 1154/ is shown in the following table

Name	Value	Unit
Category of use	3, 4	Grade
Durability	5, 8	Grade
size	1 - 7	Grade
Fire resistance	0, 1	Grade
Safety	1	Grade
Corrosion resistance	0, 1, 2, 3, 4	Grade

2.4 Application rules

Dr. Frank Werner

(Independent verifier appointed by SVR)

For construction products placed on the market EU Regulation No 305/2011 "Construction products



regulation" might apply. If requested relating to their use, door closers shall be CE marked to harmonized product standard /EN 1154/ Controlled door closing devices or /EN 1158/ - Door coordinator devices, and shall have a Declaration of Performance

For application and use, additional national provisions

For application and use, additional national provisions may also apply.

2.5 Delivery status

The products are sold by unit. Deliveries of a single unit might be possible but will be an exception. Regular deliveries will cover a larger amount of door closers as they are put on the market as "B2B" product and not for a final customer.

2.6 Base materials / Ancillary materials

Composition of product analysed for this EPD:

The values given in the table below are for the product analysed for this EPD. Ranges of values for other products covered by the validity scope analysis are shown in brackets.

Name	Value	Unit
Steel (50.20% – 75.29%)	75.29	%
Aluminium (18.99% – 49.00%)	19	%
Zinc-based alloy (0.00% – 5.17%)	5.17	%
ABS (0.00% - 0.04%)	0.04	%
Brass (0.00% – 0.13%)	0.13	%
Nylon 66 (0.00% – 0.13%)	0.13	%
Polypropylene (0.00% – 0.08%)	0.08	%
Rubber (0.00% – 0.13%)	0.04	%
POM (0.00% – 0.04%)	0.04	%
PEHD (0.00% – 0.80%)	0.00	%

The product does not contain substances cited on the REACH list of hazardous substances.

Brass is an alloy of zinc and copper. Sub-components made of brass are made by forging.

Bronze is an alloy of mainly copper and tin. Subcomponents made of bronze are made by wire drawing.

Iron is a metal produced in blast furnace. Subcomponents made of iron are made by sintering. Steel is produced by combining iron with carbon as well as other elements depending on the desired characteristics. The subcomponents made of steel are mainly formed by stamping.

2.7 Manufacture

The production of a door closers and door coordinators normally follows a 3 step procedure:

- 1. Prefabrication of the semi-finished products, this step might include a surface treatment on factory site or by external manufacturers.
- 2. Preassembly of assembly modules (onsite factory)
- 3. Final assembly (onsite factory)

The individual parts of the product are assembled manually.

2.8 Environment and health during manufacturing

Regular measurements of air quality and noise levels are performed by ARGE member manufacturers. The results shall be within the compulsory safety levels. In areas where employees are exposed to chemical products, prescribed safety clothes and technical safety devices shall be provided. Regular health

checks are mandatory for employees on production sites

2.9 Product processing/Installation

The installation of the product could vary depending on the type of door and the specific situation but products shall not require energy consumption for installation.

2.10 Packaging

Normally each single product is packaged in paper. The products are then packed by batch in a cardboard box and stacked on wooden pallets for transport to the customer.

Waste from product packaging is collected separately for waste disposal (including recycling).

2.11 Condition of use

Once installed, the products shall require no servicing during their expected service lives. There shall be no consumption of water or energy linked to their use, and they shall not cause any emissions.

2.12 Environment and health during use

No environmental damage or health risks are to be expected during normal conditions of use.

2.13 Reference service life

The Reference Service Life is 30 years under normal working conditions. This corresponds to passing a mechanical endurance test of 500.000 cycles as specified in the /EN 1154/A1/. The Reference Service Life is dependent on the actual frequency of use and environmental conditions. It is required that installation, as well as maintenance of the product, must be done in line with instructions provided by the manufacturer.

2.14 Extraordinary effects

Fire

The product is suitable for use in fire resisting and/or smoke control door sets according to one of the classes in /EN 1154/ or /EN 1158/.

Water

The declared products are intended to be used in buildings under normal conditions. They shall not emit hazardous substances in the event of flooding

Mechanical destruction

Mechanical destruction of the declared products shall not materially alter their composition or have any adverse effect on the environment.

2.15 Re-use phase

Removal of the door closer or door coordinator (for reuse or re-cycling) shall have no adverse effect on the environment.

2.16 Disposal

Door closer and door coordinator components should be re-cycled wherever possible, providing that there is no adverse effect on the environment. The waste code in accordance with the /European Waste Code/ is 17 04 07.

2.17 Further information

Details of all types and variants to be shown on the manufacturers' websites listed on http://arge.org/members/members-directory.htm



3. LCA: Calculation rules

3.1 Declared Unit

The declared unit for all products covered by ARGE EPD is 1 kg (of product). Since individual products will rarely weigh exactly 1 kg it is necessary to establish the exact weight of the product then use this as a correction factor to determine the true values for 1 kg of product in the tables (Section 5).

A total of 4 typical products (based on sales figures) have been evaluated and the worst case results are used in Section 5 of this EPD

Correction factor

Name	Value	Unit
Declared unit mass	1	kg
Mass of declared product	2.36	Kg
Correction factor	Divide	by 2.36

3.2 System boundary

This type of EPD covers "cradle-to-grave" requirements.

The analysis of the product life cycle includes the production and transport of the raw materials, manufacture of the product and the packaging materials, which are declared in modules A1-A3. Losses during production are considered as waste and are sent for recycling. No recycling processes are taken into account except transport and electricity consumption for grinding the metals. When recycled metals are used as raw material and only their transformation process is taken into account: not the extraction of the raw material.

A4 module represents the transport of the finished product to the installation site.

There is no waste associated with the installation of the product. The A5 module therefore represents only the disposal of the product packaging.

For the RSL considered for this study, there are no inputs or outputs for the stages B1-B7.

The End-of-Life (EoL) stages are also considered. The transportation to the EoL disposal site is taken into account in module C2. Module C4 covers the disposal of the product. Module C3 covers the recycling of the individual elements according to European averages, with the remaining waste divided between incineration and landfill. The same assumption as for waste to recycling in A3 is used here.

For end-of-life modules (C1 to C4) the system boundaries from the XP P01-064/CN standard have been followed, see annex H.2 and H.6 of this document for figures and further details. In practice, the end-of-life has been modelled as follows:

- When material is sent to recycling, generic transport and electric consumption of a shredder are taken into account (corresponding to the process "Grinding, metals"). Only then is the material considered to have attained the "end-of-waste" state.

Each type of waste is modelled as transport to the treatment site over a distance of 30 km (source: FD P01-015). Parts sent for recycling include an electricity consumption (grinding) and a flow ("Materials for recycling, unspecified").

Four scenarios for the end of life of the products have been declared for this EPD:

1. 100% of the product going to landfill

- 2. 100% of the product going to incineration
- 3. 100% of the product going to recycling
- 4. Mixed scenario consisting of the previous three scenarios, values depending of the amount of waste going to recycling.

Module D has not been declared.

3.3 Estimates and assumptions

The LCA data of the declared door closer and door coordinator has been calculated by the production data of in total 2 ARGE member companies representing a total amount of 4 different products. These companies had been chosen by ARGE as being representative by means of their production processes and their market shares. The door closers and door coordinators chosen as representative for this calculation follow the "worst case" principle as explained under section 6 LCA interpretation.

3.4 Cut-off criteria

The cut -off criteria considered are 1% of renewable and non-renewable primary energy usage and 1% of the total mass of that unit process. The total neglected input flows per module shall be at a maximum of 5% of energy usage and mass.

For this study, all input and output flows have been considered at 100%, including raw materials as per the product composition provided by the manufacturer and packaging of raw materials as well as the final product. Energy and water consumption have also been considered at 100% according to the data provided. With the approach chosen, no significant environmental impacts are known to have been cut-off.

3.5 Background data

For life cycle modelling of the considered product and all relevant background datasets are taken from the ecoinvent 3.1 – Alloc Rec database. The life cycle analysis software used is SimaPro (V8.0.5), developed by PRé Consulting.

3.6 Data quality

The time factor and life cycle inventory data used comes from:

Data collected specifically for this study on the ARGE manufacturers' sites. Data sets are based on 1- year averaged data (time period: January 2013 to December 2013).

In the absence of collected data, generic data from the ecoinvent V3 database was used. It is updated regularly and is representative of current processes (the entire database having been updated in 2014).

3.7 Period under review

The data of the LCA is based on the annual production data of several ARGE member companies from 2013. Other values, e.g. for the processing of the base materials, are taken from the ecoinvent v3.1 Alloc Rec where the dataset age varies for each dataset, see ecoinvent documentation for more information.

3.8 Allocation

The products are produced in numerous production sites. All data was provided by the manufacturers of the products per unit and then divided by the mass of the product to give a value per kg of product produced.



The assumptions relating to the EoL of the product are described in the section System Boundaries. Metal losses during production (stage A3) are considered as waste.

3.9 Comparability

Basically, a comparison or an evaluation of EPD data is only possible if all the data sets to be compared were created according to /EN 15804/ and the building context, respectively the product-specific characteristics of performance, are taken into account. The used background database has to be mentioned.

4. LCA: Scenarios and additional technical information

The following technical information is a basis for the declared modules or can be used for developing specific scenarios in the context of a building assessment for Modules Not Declared (MND).

Transport to the building site (A4)

Name	Value	Unit
Litres of fuel	0.0045	I/100km
Transport distance	3500	km
Capacity utilisation (including empty runs)	36	%

Installation into the building (A5)

Name	Value	Unit
Material loss	0.344	kg

Reference service life

Name	Value	Unit
Reference service life (condition of use: see §2.13)	30	а

End of life (C1-C4)

Name	Value	Unit		
Collected separately (All scenarii)	1	kg		
Recycling (Mixed Scenario)	0.76	kg		
Energy recovery (Mixed Scenario)	0.11	kg		
Landfilling (Mixed Scenario)	0.13	kg		
Incineration (100% incineration scenario) Scenario 1	1	kg		
Landfilling (Landfill scenario) Scenario 2	1	kg		
Recycling (100% recycling scenario) Scenario 3	1	kg		

It is assumed that a 16-32 ton truck is used to transport the product over the (up to) 30 km distance between the dismantling site and the next treatment site made (source: FD P01-015).

Reuse, recovery and/or recycling potentials (D), relevant scenario information

As Module D has not been declared, materials destined for recycling have been accounted for in the indicator "Materials for recycling" however, no benefit has been allocated.



5. LCA: Results

In Table 1 "Description of the system boundary", the declared modules are indicated with an "X"; all modules that are not declared within the EPD but where additional data are available are indicated with "MND". Those data can

	o be used for building asse		ssmer	nt scei	narios	. The	valid	lid digits in exponential										
form.	DIDT		C 7110	- 07/0	T		DADV	//V —	INOLI	IDED	INLLO	A - B/I	VD - 1	10DU	LENG	TDE		ED)
	DUCT S		ON PR	TRUCTI COCESS AGE		<u>soun</u>		(X =		JDED <u></u>	IN LC	A; MI		OF LIFE		I	CLAR BENEFI LOA BEYON SYST BOUND	TS AND .DS D THE TEM
Raw material supply	Transport	Manufacturing	Transport from the gate to the site	Assembly	Use	Maintenance	Repair	Replacement	Refurbishment	Operational energy	use Operational water	esn	demolition	Transport	Waste processing	Disposal	Reuse- Recovery-	Recycling- potential
A1	A2	А3	A4	A5	B1	B2	В3	B4	В	5 B	6 E	37	C1	C2	СЗ	C4	С)
Х	Х	Х	Х	Х	MND	MNE	MNE	O MN	D MN	ID MI	ND M	ND	Х	Х	Х	Х	MN	1D
RESU	JLTS (OF TH	IE LC	4 - EN	VIRO	NMEN	ITAL I	MPA	T: 11	kg of c	door	close	ſ					
Param eter	Ur	nit	A1-A3	A4	A 5	C1	C2	C2/1	C2/2	C2/3	С3	C3/1	C3/2	C3/3	C4	C4/1	C4/2	C4/3
GWP	[kg CC	D ₂ -Eq.]	5.61E+ 0	5.89E-1	1.26E-2	0.00E+ 0	5.05E-3	5.05E-3	5.05E-3	5.05E-3	4.21E-3	0.00E+	0.00E+ 0	8.66E-3	2.85E-2	5.23E-1	4.97E-1	0.00E+ 0
ODP	[kg CFC	11-Eq.]	4.71E-7	1.08E-7	3.47E- 10	0.00E+ 0	9.26E- 10	9.26E- 10	9.26E- 10	9.26E- 10	4.52E- 10	0.00E+	0.00E+ 0	9.30E- 10	2.08E- 10	4.02E-9	3.43E-9	0.00E+ 0
AP	[kg SC) ₂ -Eq.]	3.79E-2	2.39E-3	1.23E-5	0.00E+ 0	2.05E-5	2.05E-5	2.05E-5	2.05E-5	1.75E-5	0.00E+	0.00E+ 0	3.60E-5	1.04E-5	2.58E-4	1.24E-4	0.00E+ 0
EP	[kg (PO	4) ³⁻ -Eq.]	4.97E-3	4.06E-4	8.17E-6	0.00E+ 0	3.48E-6	3.48E-6	3.48E-6	3.48E-6	1.96E-6	0.00E+	0.00E+ 0	4.04E-6	1.99E-5	7.52E-5	5.94E-4	0.00E+ 0
POCP	[kg ethe	ne-Eq.]	4.64E-3	2.68E-4	3.79E-6	0.00E+ 0	2.30E-6	2.30E-6	2.30E-6	2.30E-6	9.63E-7	0.00E+ 0	0.00E+ 0	1.98E-6	4.67E-6	1.60E-5	1.41E-4	0.00E+ 0
ADPE	[kg St	o-Eq.]	4.57E-4	1.95E-6	3.89E-9	0.00E+ 0	1.67E-8	1.67E-8	1.67E-8	1.67E-8	1.71E-9	0.00E+	0.00E+ 0	3.53E-9	1.96E-9	4.69E-8	2.47E-8	0.00E+ 0
ADPF	[M	J]	7.31E+ 1	8.97E+ 0	3.32E-2	0.00E+ 0	7.69E-2	7.69E-2	7.69E-2	7.69E-2	6.46E-2	0.00E+	0.00E+ 0	1.33E-1	1.81E-2	3.73E-1	2.80E-1	0.00E+ 0

GWP = Global warming potential; ODP = Depletion potential of the stratospheric ozone layer; AP = Acidification potential of land and water; EP = Eutrophication potential, POCP = Formation potential of tropospheric ozone photochemical oxidants; ADPE = Abiotic depletion potential for non-Caption fossil resources; ADPF = Abiotic depletion potential for fossil resources

										-							
Parameter	Unit	A1-A3	A4	A5	C1	C2	C2/1	C2/2	C2/3	С3	C3/1	C3/2	C3/3	C4	C4/1	C4/2	C4/3
PERE	[MJ]	1.71E+1	1.12E-1	2.51E-3	0.00E+0	9.61E-4	9.61E-4	9.61E-4	9.61E-4	8.35E-3	0.00E+0	0.00E+0	1.72E-2	9.33E-4	1.14E-2	2.11E-2	0.00E+0
PERM	[MJ]	2.02E+0	0.00E+0	- 1.74E+0	0.00E+0												
PERT	[MJ]	1.91E+1	1.12E-1	- 1.73E+0	0.00E+0	9.61E-4	9.61E-4	9.61E-4	9.61E-4	8.35E-3	0.00E+0	0.00E+0	1.72E-2	9.33E-4	1.14E-2	2.11E-2	0.00E+0
PENRE	[MJ]	8.13E+1	9.13E+0	4.17E-2	0.00E+0	7.82E-2	7.82E-2	7.82E-2	7.82E-2	9.47E-2	0.00E+0	0.00E+0	1.95E-1	2.07E-2	3.86E-1	3.53E-1	0.00E+0
PENRM	[MJ]	1.87E-1	0.00E+0	-9.83E-3	0.00E+0												
PENRT	[MJ]	8.15E+1	9.13E+0	3.18E-2	0.00E+0	7.82E-2	7.82E-2	7.82E-2	7.82E-2	9.47E-2	0.00E+0	0.00E+0	1.95E-1	2.07E-2	3.86E-1	3.53E-1	0.00E+0
SM	[kg]	7.86E-1	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0
RSF	[MJ]	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0
NRSF	[MJ]	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0
FW	[m³]	8.90E-2	1.72E-3	2.12E-5	0.00E+0	1.48E-5	1.48E-5	1.48E-5	1.48E-5	3.18E-5	0.00E+0	0.00E+0	6.54E-5	4.05E-5	1.17E-3	3.42E-4	0.00E+0

PERE = Use of renewable primary energy excluding renewable primary energy resources used as raw materials; PERM = Use of renewable primary energy resources used as raw materials; PERT = Total use of renewable primary energy resources; PENRE = Use of non-renewable primary energy excluding non-renewable primary energy resources used as raw materials; PENRM = Use of non-Caption renewable primary energy resources used as raw materials; PENRT = Total use of non-renewable primary energy resources; SM = Use of secondary material; RSF = Use of renewable secondary fuels; NRSF = Use of non-renewable secondary fuels; FW = Use of net fresh water

OF THE LCA - OUTPUT FLOWS AND WASTE CATEGORIES:

1 kg of door closer	4		~6	ہ لہ	~ ~	α Ι.		
		KU	OI -	uυ	or-	CI	use	п

Parameter	Unit	A1-A3	A 4	A5	C1	C2	C2/1	C2/2	C2/3	С3	C3/1	C3/2	C3/3	C4	C4/1	C4/2	C4/3
HWD	[kg]	1.34E+0	5.64E-3	2.19E-4	0.00E+0	4.83E-5	4.83E-5	4.83E-5	4.83E-5	2.98E-4	0.00E+0	0.00E+0	6.14E-4	6.89E-3	2.66E-1	1.24E-3	0.00E+0
NHWD	[kg]	4.41E+0	4.68E-1	1.33E-2	0.00E+0	4.01E-3	4.01E-3	4.01E-3	4.01E-3	1.35E-3	0.00E+0	0.00E+0	2.77E-3	3.08E-2	1.45E-2	1.00E+0	0.00E+0
RWD	[kg]	2.77E-4	6.13E-5	2.42E-7	0.00E+0	5.25E-7	5.25E-7	5.25E-7	5.25E-7	5.11E-7	0.00E+0	0.00E+0	1.05E-6	1.15E-7	1.35E-6	2.65E-6	0.00E+0
CRU	[kg]	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0
MFR	[kg]	7.05E-1	0.00E+0	1.33E-1	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	4.86E-1	0.00E+0	0.00E+0	1.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0
MER	[kg]	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0	0.00E+0
EEE	[MJ]	2.77E-4	0.00E+0	1.58E-2	0.00E+0	2.71E-3	1.39E+0	0.00E+0	0.00E+0								
EET	[MJ]	5.68E-4	0.00E+0	3.30E-2	0.00E+0	5.56E-3	2.85E+0	0.00E+0	0.00E+0								

HWD = Hazardous waste disposed; NHWD = Non-hazardous waste disposed; RWD = Radioactive waste disposed; CRU = Components for re-use; MFR = Materials for recycling; MER = Materials for energy recovery; EEE = Exported electrical energy; EEE = Exported Caption thermal energy



Other end of life scenarios have been calculated in order to build specific end of life scenario at the building level:

- scenario 1: the product is considered to be 100% incinerated
- scenario 2: the product is considered to be 100% landfilled
- scenario 3: the product is considered to be 100% recycled

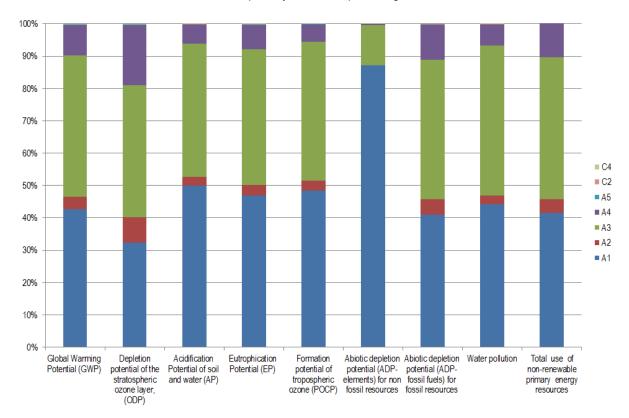
6. LCA: Interpretation

This chapter contains an interpretation of the Life Cycle Impact Assessment categories. When expressed as a percentage, the impact refers to its magnitude expressed as a percentage of total product impact across all modules, with the exception of module D.

Production stages (A1 and A3) are the main contributors to all environment indicators, especially for

the ADP-elements indicator for A1 phase. Its impacts are mainly due to aluminium and steel extraction and production. A3 impacts come from aluminium and steel losses during the manufacturing of the product. Transport stage A4 has a non-negligible impact for the ODP.

The results are conservative as complying with the composition given in section 2.6.



7. Requisite evidence

No testing results are required by the PCR part B.

8. References

ISO 14040

ISO 14040:2006 - 10, Environmental management – Life cycle assessment – Principles and framework (ISO 14040:2006); German and English version EN ISO 14040:2006

DIN EN ISO 14044

DIN EN ISO 14044:2006-10, Environmental Management – Life Cycle Assessment Requirements and Instructions (ISO 14044:2006); German and English version EN ISO 14044:2006

CEN/TR 15941

CEN/TR 15941:2010-03, Sustainability of construction works – Environmental Product Declarations –

Methodology for selection and use of generic data; German version CEN/TR 15941:2010

EN 1154

EN 1154:1996/AC:2006, Controlled door closing devices – Requirements and test methods

FN 1158

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FD P01-015

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