

# dhf guidance on server fire shutters

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# Foreword

**dhf** has produced this document in response to concerns raised within the industry relating to fire rated roller shutter doors installed on server hatch and similar applications. The aim is to identify the responsibilities for manufacturers of fire rated roller shutters, and the issues which have been raised in respect of these products. It also provides advice for installers and maintainers in the course of their work.

Fire roller shutters in the UK are currently covered by two standards, both of which are Harmonised within the EU to the Construction Product Regulation 305/2011 and Designated within the UK to the Construction Products Regulations 2013 (CPR). This places responsibilities on the manufacturer to CE mark the product within the EU and UKCA mark the product in the UK. Currently, CE marking is still accepted within the UK following recent UK Government guidance.

Since November 2019, for resistance to fire characteristics, the manufacturer of fire doors of any type must employ the services of an EU notified, or UK approved certification body who will issue certification in accordance with EN 16034:2014. Certification can only be issued for a door which is covered by a Harmonised or Designated standard for the door itself - in the case of roller shutters, this would be EN 13241:2003+A2:2016.

Prior to November 2019, fire shutters may have been tested to either EN 1634-1 or to the British standard BS 476 part 22 with assessments carried out by a fire engineer. There was no requirement for certification under this scheme, although voluntary 3rd party certification schemes existed.

The notified or approved certification body must follow the procedures detailed below to comply with the requirements of EN 16034:2014:

1. Assess the manufacturer's Factory Production Control system
2. Commission a fire test (or assess the results of a fire test where they are prepared to do so) to EN 1634-1:2014+A1:2018
3. From the test evidence create Field of Application reports using direct application (DIAP) rules included within the above standard, and extended application (EXAP) rules in accordance with EN 15269-10:2011 to establish the extent of the certification which they are prepared to issue

4. Create a classification report to EN 13501-2:2016 using the data above
5. Issue a Certificate of Constancy of Performance based on the classification report
6. Carry out ongoing audits of the Factory Production Control system

As a result of ongoing audits, some certification bodies have come to the conclusion that their certification does not cover fire shutters which do not close to the floor e.g. a server hatch, and informed manufacturers accordingly.

The reason behind this decision is that the test standard EN 1634-1:2014+A1:2018 requires that the supporting construction for the fire test is in accordance with EN 1363-1:2020 which contains no provision for a door which does not close to the floor. Any variation to the test standard can only be certified where a rule exists within the Extended Application report standard EN 15269-10:2011. Within the current standard, no such rule exists.

A manufacturer may be able to obtain certification by carrying out further testing in addition to their current scheme for the specific condition of a door closing onto a server hatch.

This situation has created a range of issues for companies involved in the manufacture, installation and maintenance of fire resisting roller shutter doors.

### Manufacturers

The responsibility for conformity marking the product and hence complying with the CPR lies exclusively with the manufacturer. Without the relevant certification, they cannot CE (or UKCA) mark a fire shutter, or issue the supporting document required, namely a Declaration of Performance. To do so would place them in the breach of the legislation.

Therefore, unless the manufacturer has achieved separate certification for doors closing onto serving counters, they are unlikely to be able to provide a fully compliant product.

### Installers

Within the legislation there is a limited responsibility for an installer to check conformity of the product which they are installing. They should ensure that the manufacturer has provided a Declaration of Performance, which must be provided to the end user, and that the product is provided with a valid CE or UKCA label.

In the case of the doors covered by this document, it would be prudent to investigate whether the manufacturer holds the relevant certification. Otherwise, it may be necessary to come up with a suitable configuration for the door e.g. closing the door to the floor in front of the servery.

### Maintenance providers

A maintenance provider can only report on what they are faced with on site. They should be assessing the shutter on:

1. Fire performance evidence - this may be a CE or UKCA label, a Declaration of Performance, a label from a voluntary 3rd party certification scheme or documentation held by the client with evidence of fire testing and any supplementary evidence such as assessments by a fire engineer
2. The condition of the shutter and its fixings, assessing for any damage or potential non-compliances caused by installation (where installation instructions can be accessed) or by subsequent damage
3. The condition of the supporting structure particularly any damage which may affect performance of the installed door in a fire situation

4. The deployment method of the door - unless the user can provide details of what this is intended to be the advice can only relate to what is currently in place

Where no fire performance evidence exists, a maintenance provider can only comment on the fact that the shutter may appear to be fire resisting, and in detail on points 2,3 and 4.

Since CPR only relates to placing the door on the market, it is not the maintenance provider's responsibility to assess conformity or otherwise with the legislation and, as such, there would be no requirement for the maintainer to investigate compliance or non-compliance with CPR in respect of testing or certification held by the manufacturer. The maintenance company would however be expected to assess compliance with TS 013-1 e.g. structure, fall back protection, safety in use.

### What next?

**dhf** has made representations to OPSS, the government body that governs safety of construction products, for an interim assessment of the situation until the relevant standards are revised to include a solution to this issue.

Until a clarification has been received in this matter, it may be prudent for companies involved in the installation of such doors to advise the customer of the potential for non-compliance where a compliant door cannot be sourced, and ask the user to consider a specification that provides the required conditions for a fully compliant door e.g. a door which closes to the floor in front of a servery hatch.

Advice from the manufacturer as to their certification would be extremely valuable in coming to a suitable specification.

### Disclaimer

N.B. The situation described above may change due to developments in the relevant standards and legislation and also to changes in policy by individual conformity assessment bodies.

The information and advice is offered in good faith but may be modified as circumstances dictate.



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