

ENQUIRY
ENQUÊTE
UMFRAGE



FNFW-AA 192.03 N 78

EUROPEAN COMMITTEE FOR STANDARDIZATION
COMITÉ EUROPÉEN DE NORMALISATION
EUROPÄISCHES KOMITEE FÜR NORMUNG

DRAFT EUROPEAN STANDARD PROJET DE NORME EUROPÉENNE EUROPÄISCHER NORM-ENTWURF	prEN 443 REVIEW
Originator - Auteur du projet - Urheber: CEN/TC 158	Secretariat - Secrétariat - Sekretariat : BSI
Work item - Projet - Projekt : 00158046	
Title : Helmets for fire fighting in buildings and other structures	
Titre : Casques pour la lutte contre les incendies de structure	
Titel : Feuerwehrhelme	

Deadline for replies - Date limite de réponse - Termin: 2004-12-17

Reply by - Réponse de - Antwort von: DIN, Germany (CEN Member - Membre CEN - CEN-Mitglied)

Answers to be stated in full details in an annex; * Critical comments shall be underlined (BT Resolution 37/1997).
Détails des réponses à joindre en annexe; * Les commentaires critiques doivent être soulignés (Résolution BT 37/1997).
Antworten sind als Anhang mit allen Einzelheiten beizufügen; * Kritische Kommentare sind zu unterstreichen (BT-Resolution 37/1997).

	YES	NO
Possible acceptance as a European Standard : Accord possible en tant que norme européenne : Mögliche Annahme als Europäische Norm :	<input checked="" type="checkbox"/>	<input type="checkbox"/>
* Comments of editorial nature : * Commentaires rédactionnels : * Redaktionelle Kommentare :	<input checked="" type="checkbox"/>	<input type="checkbox"/>
* Comments of technical nature : * Commentaires techniques : * Fachliche Änderungen :	<input checked="" type="checkbox"/>	<input type="checkbox"/>
National legislative/administrative deviation : Divergences nationales législatives/administratives : Nationale legislative/administrative Abweichungen :	<input type="checkbox"/>	<input checked="" type="checkbox"/>
National technical/economic deviation : Divergences nationales techniques/économiques : Nationale technische/wirtschaftliche Abweichungen :	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Place and date - Lieu et date - Ort und Datum

Berlin, 2004-12-01

Name and signature - Nom et signature - Name und Unterschrift

signed Michael Behrens

Standards committee for firefighting and fire protection in DIN e.V

After completion, please return this form to the secretariat of the originating Technical Committee.
Après avoir rempli le formulaire, prière de le retourner au secrétariat du Comité Technique, auteur du projet.
Bitte senden Sie das ausgefüllte Formular an das Sekretariat des zuständigen Technischen Komitees.

Template for comments and secretariat observations

Date: 2004-12-01

Document: prEN 443

1	2	(3)	4	5	(6)	(7)
MB ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of com- ment ²	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted
DE	Title		ed	The title of the standard is too restrictive; modify into: →	Helmets for fire fighting Casques pour la lutte contre les incendies Helme für den Feuerwehreinsatz	
DE	Contents	Page 3, line 17	ed	Typing error "General 15"	Delete "General 15"	
DE	1	Last line	ed	(French version only): Figures 1-5 are missing in the French version	Include pictures 1 to 5	
DE	2		ed	Standards mentioned in the text are missing. Delete the publication dates of all standards in case of non dated references in the text.	Add: EN 373, Protective Clothing – Assessment of resistance of materials to molten metal splash EN 368, Protective Clothing – Protection against liquid chemicals – Test method: resistance to materials to penetration by liquids	
DE	3.1		ed	For better understanding of areas 2, 3a und 3b insert the referred Fig 11 of EN 168:2001 in EN 443		
DE	3.1	2 nd para, 2 nd hyphen	te	For fire fighting application only full face masks, class 3, are allowed.	Insert: ... by the full face mask, <i>class 3</i> , of a breathing apparatus ... and "(national regulations apply)"	
DE	3.1	2 nd §, 2 nd hyphen	ge	It is made not clear that when a full face mask according to EN 136 is used the protection given by that mask is sufficient for area 2.	Add: ... complying with the standard EN136 <u>only</u> .	
DE	3.6		ed	„Basic plane“ Delete this headline because it's included and defined in 3.7 und 3.8.		
DE	3.9	1 st §	te	Definition not clear	Add: ... <u>as defined in EN 960:1995</u>	
DE	3.9 to 3.32		ed	If 3.6 is deleted then a new clause numbering is necessary	3.8 to 3.31	
DE	3.10	1 st §	ed	Reference to Figure 3 is missing	Add: ... <u>(see Figure 3)</u>	

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DE	3.11	1 st §	ge	Definition should be better defined in terms of “correctly adjusted”	Add: ... <u>according to instructions of use</u>	
DE	3.13	1 st §	ge	Definition should be better defined in terms of “correctly adjusted”	Add: ... <u>according to instructions of use</u>	
DE	3.18		ed	For better understanding please add examples to the definition		
DE	3.25	Head line	ed	“Neck-guard” is called “neck-curtain” later in the standard (e.g. in 4.1.9)	Use “neck guard” throughout the document	
DE	3.26	Face shield	ed	Face shield is misleading wording, because only area 2 (= eye area) is covered per definition.	“Face shield” to be changed to “Eye shield” throughout the standard	
DE	3.32		te	It's not possible that an area is on an axis. Modify into <u>sagittal plane</u>	... of the helmet which lies on the <u>sagittal plane</u> through the headform to which	
DE	4.1		ed	A note must be inserted that with a helmet-mask combination a new PPE is created which must be checked in combination as ensemble (PPE Directive).		
DE	4.1.1	1 st sentence	ed	The first sentence is not in accordance with the "New Approach". It's possible and legal to sell a helmet which is not in accordance with EN 443 but which is manufactured in accordance with the PPE Directive.	Helmets, as offered for sale <u>and declared as in accordance with this European Standard</u> , shall satisfy the requirements of this European Standard.	
DE	4.1.1	1 st §	ge	3.18 has to be removed from the text. Items according to 3.18 are “integral” and not intended “to be removed by the user, except for maintenance and fitting purposes” (see definition in 3.18) Therefore it is clear that for testing the helmet <u>is</u> fitted with those items anyhow.	Delete “3.18”	
DE	4.1.8	1 st line and Note 1 st line	ed	“face shield” shall be called “eye shield”, see also comment on 3.26	Substitute “face shield” by “eye shield” (2 times)	
DE	4.2.2	2 nd §	ge	The <u>protection</u> shall be tested. Minimal evident fracture, fissure or deformation shall be allowed. This will also avoid discussions on the meaning of “evident”.	Modify: “... , there shall be no evident fracture, fissure or deformation of the material <u>when inspected visually without the aid of an enlarger</u> .”	
DE	4.5		ed	Wrong clause reference	5.5.4 = 5.5	

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DE	4.6.1		ed	Wrong clause reference	5.6.1 = 5.6	
DE	4.8.2		te	Delete this subclause! Requirements and tests regarding protection against molten metals are absolutely not relevant and impractical for fire fighter helmets.	Delete this subclause 4.8.2 and reduce the title of 4.8 to "Protection against hot solids"	
DE	4.9.1.2		te	The allowed distortion of the helmet (40 mm behind and 30 mm at the sides) after 20 minutes of stove storage with 90 °C is too tolerant.	Distortions of maximum 5 mm should be allowed.	
DE	4.9.2	Head line	ed	In the text there is no requirement for area 3b.	Please check if in the head line "and area 3b" can be deleted.	
DE	4.9.2	1 st line	ed	See German comment on 3.25	Change "neck curtain" to "neck guard "	
DE	4.10.1 and 4.10.2		te	It makes no sense to test areas 1a, 1b and 3a, 3b in different tests, since the complete ensemble shall supply the protection to the wearer. The complete ensemble can be tested in 4.10.1 (flame engulfment test), additional test 4.10.2 would be a duplication of tests. The flame engulfment test is the more severe test, so 4.10.2 can be deleted	Change 4.10.1 headline to "All areas", Text to be changed to: "When the complete helmet is tested in accordance with 5.10.1 ... Delete 4.10.2	
DE	4.11.1		ge	Remark: See German comment on 5.11.1 to be sure that small damages caused by daily use are considered and that these requirements are not only valid for new helmets.		
DE	4.11.3		ed	Wrong clause reference	6.10.3 = 5.11.3	
DE	4.12.1		te	Colour changes due to washing off the finish does not change the protection of the helmet. Therefore on the helmet shell colour changes shall not always be regarded as a damage.	Add a note: NOTE Colour changes can be a symptom of damage of the material.	
DE	4.12.2		te	Clause 6.10 respective 5.2 of prEN 469:2004 requires the materials to be washed 5 times before the test. That makes no sense to visor materials.	Add a Note: NOTE Clause 6.10 of prEN 469:2004 does only apply for textiles.	

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DE	4.12.2	Head line	te	Testing 3a and 3b the same way does not make sense, since different types of materials	Please check if in the head line "and area 3b" can be deleted.	
DE	5		ge	Add a clause "Visual inspection" (like in prEN 137)	Extract from prEN 137: 7.3 Visual inspection The visual inspection shall be made by the test house prior to laboratory or practical performance tests. This may entail a certain amount of dismantling in accordance with the manufacturer's instructions for maintenance. The visual inspection shall include marking and information supplied by the manufacturer.	
DE	5.1.3		te	Conditioning: All requirements and tests applies at the moment to helmets in sales condition (new condition). The requirements in this standard cannot be valid only for new helmets. A test procedure is required for the reproduceable change of the surface of the helmet which simulates small damages (scratches) caused by daily use (simulation of surface scratch in the helmet). We suggest to add an existing European test procedure (from EN 50365 as first preconditioning; chafing with sandpaper) as new 5.1.4 and to add this preconditioning in Table 1 accordingly: →	"5.1.4 Small damages (scratches) caused by daily use To ensure the usability, the helmet shall be preconditioned in accordance with EN 50365:2002, 6.3.3, 1 st §, but only for the helmet outside."	
DE	5.1.3	Table 1	ed	Table 1: 1 st row, wrong clause reference What's the meaning of the grey boxes?	Change the clause references 6.1.4, 6.1.5. bis 6.1.9 into 5.1.4 (new) to 5.1.10 Delete the grey colour in the boxes.	
DE	5.1.6	1 st sentence	te	To achive reproducibile tests, a standard has to fix allways exact values (added with "at least", "up to" or with tolerances). It's a basic rule in standardisation. Therefore don't use the word "approximately".	Delete "approximately" (2 times) and add a tolerance.	

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DE	5.1.7	2 nd sentence	te	A breathing apparatus according to EN 136 is preconditioned, e.g., with 60 °C. This should also apply to fire fighting helmets.	Modify „(+50 ± 2) °C“ into „(+60 ± 2) °C“	
DE	5.1.8	2 nd sentence	te	A breathing apparatus according to EN 136 is preconditioned, e.g., with -30 °C. This should also apply to fire fighting helmets.	Modify „(-10 ± 2) °C“ into „(-30 ± 2) °C“	
DE	5.2.2	Last sentence	te	“Ear level” is not defined.	Replace “at ear level” by “at basic plane of the human head”.	
DE	5.7.1	Last sentence	ed	Typing error	Delete “or”	
DE	5.8.2		te	Delete this subclause! (see also German comment to 4.8.2) Requirements and tests regarding protection against molten metals are absolutely not relevant and impractical for fire fighter helmets.	Delete this subclause 5.8.2 and reduce the title of 5.8 to “Protection against hot solids”	
DE	5.10		ed	For better understanding please add a picture/figure of the test apparatus.		
DE	5.10.1		te	Please check: The remark regarding triple use of the fire fighters jacket should be left open, because the principle of selection after unique use excludes unknown changes of the clothing which can have effects on the test result.		
DE	5.10.1		te	Please check if a remark can be made that the measured temperature is to be taken up in the instruction for use.		
DE	5.10.1		te	To the “Basis of the test method”: Temperature measurements in the head of the manikin should be optional because the measuring method is not defined.		
DE	5.10.1		te	To the “Test procedure”: Better wording required.	The highest burner strip shall conclude by height L ₁ .	
DE	5.10.2		te	See German comment on 4.10.1 and 4.10.2	Delete complete paragraph	

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DE	5.11.1			Remark: See German comment on 4.11.1 and 5.1.3 to be sure that small damages caused by daily use are considered and that these requirements are not only valid for new helmets.		
DE	5.12		te	The test should be optional	Add "(optional)" in the title and in the text of 4.12	
DE	5.12.2	Head line	te	See German comment on 4.12.2	Please check if in the head line "and area 3b" can be deleted.	
DE	6	1 st §	ge	Marking shall be allowed in any possible durable and not manipulable way: moulded, impressed, printing etc. according to the state of the art.	"Every helmet claimed to comply with the requirements of this European Standard shall carry <u>durable and not manipulable</u> visible, legible and unambiguous, moulded or impressed , marking (e.g. moulded or impressed) giving the following information:	
DE	6	c)	ge	Quarter or month may be not unambiguous: 3/2005 may be march 2005 or 3 rd quarter 2005.	Delete: "or month"	
DE	6	e)	te	How should small parts (like screws etc.) be marked? Some parts intended by the manufacturer to be replaced by the user might be suitable for several models of helmets. Such a marking might therefore be confusing. Proposal is to have type identifying marks on such parts. Further explanations shall be given in the instructions for use.	Delete 2 nd sentence of e). Add new h) Parts intended by the manufacturer to be replaced by the user shall carry a type identifying mark	
DE	6		te	Marking, optional requirement: Add in the classification contact with liquid chemicals (optional) according to 5.12, e.g., by CL = chemical liquid (see also German comment on 5.12) and add "CL" in the example.	Liquid chemical classification CL	
DE	6		ed	Marking, optional requirement, electrical classification: E2 and E3 were not mentioned in this standard yet. The references are wrong: 6.1.9.2 and 6.1.9.3 do not exist in this draft.	Add an explanation of E2 and E3. Correction of the references.	

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DE	6		ed	Marking, optional requirement, Low temperature classification: The requirements of marking are not clear. "degrees" is missing.	Add clause reference to the requirements/testing.	
DE	6	g)	ed	Typing error	Change "HPDE" to "HDPE"	
DE	7	g)	ed	This gives no useful information to the user.	Please check if g) can be deleted.	
DE	7	Figure 1	ed	Wrong designation of A-A'-plane. In Figure 1 it's designated as A-A-plane.	Change „A-A“ to „A-A' “	

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