



IMPORTANT REGULATION UPDATE EFFECTIVE 1/5/05

TO: All sales and technical staff at: Aubry Material S.A
Big Plast S.L
Dairy Dav
Dan Egtved A/S
DataBel Trading
Forde Products (Cork) Ltd
FVP France
Patura Allie Agritechnik GmbH
Ricon International BV
Schmidt Buschjager

Date: 11th May 2005
From: Jeremy Scudamore

From 1st May 2005 new safety regulations and guidelines came into force, which effect you, your dealers and your customers. This memo is written to provide you with a factual summary of these new regulations including the changes we have made to the Galebreaker range of door systems to make sure we comply. All Galebreaker systems will comply with these regulations.

We expect many of our competitors will ignore the regulations and disregard the changes needed, to maintain a price advantage. Whilst we know there is a cost incurred in compliance, we see the improved safety as beneficial to the customer and CE compliance is a major selling advantage over competition.

What new Regulations?

Manual operating doors: European Directive 89/106/EC
Key European Standard EN-13241-1

Electric operating doors: European Directive 89/106/EC; 89/336/EC; 98/37/EC
Key European Standard EN-13241-1; EN-12453

Why do we need more regulations?

The regulations are to harmonise the following standards across Europe to allow free movement of goods.

1. Safety standards
2. Mechanical standards
3. Electrical standards

The new regulations also give a common standard to specify doors for resistance to wind-load, thermal properties, etc; thereby enabling comparisons to be made between different doors. If such properties for doors are stated, they must be verified by an independent laboratory.

All systems CE marked will demonstrate compliance

Which countries are affected?

Austria, Belgium, Czech Republic, Cyprus, Denmark, Finland, Estonia, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden, Switzerland, UK

Does it apply to farm buildings?

Yes for both manual and electric door types. For electrical doors the regulation has three classifications, we class farmers as “**trained public**”. The three classifications are

1. **Trained professionals:** Very specialised industrial applications where employees are specifically trained in the use of that door and individual risk assessment has been carried out.
2. **Trained Public:** Galebreaker users. Doors in industrial, commercial and farm environments. Operators of these doors are aware of Health and Safety aspects of their work and have instructions for the use of the door.
3. **Un-trained public:** i.e. people of all ages and aptitude who are in a shopping arcade and are totally unaware of Health and Safety and how the door works. The regulations stipulate a much higher level of safety protection. Should you have such an inquiry refer to Head Office as to whether the product in question can qualify for this market.

Each classification has different safety standards, which our doors have to meet for total compliance. Trained professionals need less safety measures due to training than the un-trained public.

“The competition say livestock building and doors are excluded from the regulations”

There is an exclusion (EN13241-1.2) in the standard detailing livestock doors. To be excluded a door has to be used to restrain livestock, for example a gate or barrier. Galebreaker doors are not designed for this purpose and are not, as our competition, excluded.

What Galebreaker product changes have been made to ensure compliance?

Please refer to Appendix 1 detailing product by product the changes.

Summary

We are committed to providing products, which comply with these regulations. For the last six months our main development has focused on the testing, documentation changes and additional safety features needed for compliance. New sales warrantee will only be valid for those systems supplied to the full Galebreaker specification. Distributors who buy component parts under our Bulk Purchasing Scheme and choose not to supply secondary safety devices do so at their own risk and without Galebreaker warrantee.

While there are customer benefits, compliance has come at a cost.

- For the rolling systems Galebreaker will absorb the additional cost until a new price list is issued Summer '05 price list.
- Appendix 2 details the cost of the safety edge required for Agridoor with radio control. These are with immediate effect.
- Galebreaker will advise the cost of the Multibay clutch (when used as a door) and Maxidoor when they are available.

Appendix 1

Galebreaker Product enhancements for the new regulations

Rollerscreen / Rollerdoor

If the bottom tube is over 20kg a secondary safety device is required should the main drive element fail.

- Rollerscreen and Rollerdoor up to 5m: OK as tube weight is less than 20kg
- 5.5m and 6m Rollerdoors and Rollerscreens include a 'Safety Spring'. This will not stop the blind descending in the event of a spring/gearbox failure, but will exert enough upward force on the bottom tube to bring it under the 20kg threshold.

Rapid Rollerdoor

- Rapid Rollerdoor already has a full counter-balance spring which acts as a secondary device

Manual Agridoor

- Manual Agridoor already has a full counter-balance spring which acts as a secondary device

Electric Agridoor

- Electric Agridoor already has a full counter-balance spring which acts as a secondary device
- Basic push-button operation: These will have to have a 'dead-man' operation, i.e. push to run.
- Radio control and latched operation: A safety edge will have to be attached to the bottom tube to stop the door in the event of an obstruction. With **immediate effect all** radio controls Agridoors will have the safety edge at an additional cost

Multibay:

When used as a side curtain Multibay does not come under the regulation and therefore no change is necessary however when it is used as a door;

- We are developing a centrifugal clutch that will operate if the motor or manual drive fails. The clutch will have to be mounted on a free-end trolley-box, i.e. opposite end of the drive. Tests continue and although this mechanism is not ready, it will be shortly and we will keep you up dated on our progress

Trackscreen:

No change

Manual & Electric Maxidoor:

- Both systems need automatic break in the system to hold the door in the event of a cable or winch failure. Development and trials continue for the brake. We will keep you up dated on our progress
- Cable drum on the lifting winch has to be completely redesigned to comply with new regulations. Regulations dictate the drum diameter and how the cable is collected onto the drum

PVC strip:

No change

VVS, Bayscreen, Cattlescreen, Farmflex

No change as they are not doors.

Documentation Changes:

All installation instructions have to be edited to include:

- Higher level of health and safety warnings than currently listed.
- Improved maintenance information.
- Dismantling instructions
- CE certificate for all products, whether manual and electric.

Appendix 2

Electric Agridoor with Radio; additional cost for safety edge.

CODE	DESCRIPTION	€
EM-SEOBR125	2.5M OPTICAL SAFETY EDGE TYPE 1	186.88
EM-SEOBR130	3.0M OPTICAL SAFETY EDGE TYPE 1	196.37
EM-SEOBR135	3.5M OPTICAL SAFETY EDGE TYPE 1	205.90
EM-SEOBR140	4.0M OPTICAL SAFETY EDGE TYPE 1	215.37
EM-SEOBR145	4.5M OPTICAL SAFETY EDGE TYPE 1	224.86
EM-SEOBR150	5.0M OPTICAL SAFETY EDGE TYPE 1	234.38
EM-SEOBR155	5.5M OPTICAL SAFETY EDGE TYPE 1	243.92
EM-SEOBR160	6.0M OPTICAL SAFETY EDGE TYPE 1	253.39