CE MARKING

2013 European Construction Products Regulation

On 1st July 2013 the Construction Products Regulation (CPR) will come into effect, it will become a legal requirement that on every project you must provide a document which contains a Declaration of Performance (DoP) of the installed products and each

product must carry a CE Mark. In this note we hope to introduce you to the requirements of the CPR, simplify the jargon, and provide a plan of action.

We have divided this document into 3 sections:

Section 1 – All of the terms and the current actual legal status.
Section 2 – What you have to do.
Section 3 – Appendices including:

- CE logo Example
- DoP Examples
- Dangerous Substance Declaration
- FPC – Firms that can help

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SECTION 1: THE LEGAL STUFF & WHAT YOU HAVE TO DECLARE

European Construction Products Regulations (CPR), CE Marking, hENs & DoP's

CE Marking

The CE Mark is an identification mark that indicates a product complies with the harmonised European Norms (hENs), as published by European Directives. Products with the CE Mark may be sold throughout countries that belong to the European Union. The CE Mark must be displayed on the products label, packaging or accompanying commercial documents.

European Construction Products Regulations (EU) No 305/2011 (CPR)

Construction Products Regulation (the CPR) is to ensure reliable information on construction products in relation to their performances. This is achieved by providing a "common technical language", offering uniform assessment methods of the performance of construction products, throughout Europe. Manufacturers must show compliance with Harmonised European Standards (hEN's). This is mandatory for all construction product manufacturers from July 2013.

DoP's

The Declaration of Performance (DoP) is the key concept in the Construction Products Regulation (CPR). The DoP gives the manufacturer the opportunity to deliver the information about the essential characteristics of the product they want to deliver to the market. The manufacturer shall draw up a Declaration of Performance when a product covered by a harmonised standard is sold.
The manufacturer, by drawing up his DoP, assumes the legal responsibility for the conformity

of the construction product with the declared performance.

There are 8 various “characteristics” one can declare on a DoP, but only 3 are currently a legal requirement in the UK, therefore it is permissible for the manufacturer to insert NPD (No Performance Declared) in to the remaining 5 categories.

CPR Harmonised EU Standards & UK Building Regulations

The following characteristics must be declared:-

- Thermal Performance
- Dangerous Substances
- Load bearing capacity of safety devices (350N threshold level)

For locked doorsets on escape routes this list includes one other characteristic:

- Ability to release (UK building regulations requirement)

Therefore, if a Panic Exit door is installed its performance must be declared in the DoP. Axim panic devices are CE marked.

These should be under-taken by a notified body i.e. “UKAS Accredited” test house.

CE Mark & DoP’s

Based on the required content and manufacturer’s preference, there is an option to combine the DoP and the CE marking on the same page.

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SECTION 2: CHECKS THAT WE ARE CONFORMING

The harmonised standards refer to the testing and classification standards you must use when declaring the 8 characteristics. These standards are detailed in BS EN 14351-1. We suggest you obtain your copy of the standard, but here we provide a summary of what it means for you.

Your Factory Production Control (FPC) and Using ITT (Initial Type Testing)

The Comar Product to be CE marked/DoP will have been tested by a third party organisation or "notified body", you may use these test results; this is called cascading or sharing the ITT (Initial Type Test). However, you must introduce an internal audit system in your production to make sure that you can provide evidence that you are manufacturing to the same standard as the original tested Comar product, this is Factory Production Control or "FPC".

Assessment and Verification of Constancy of Performance (AVCP)

The system of Assessment and Verification of Constancy of Performance (AVCP) of the FPC is the term applied to define the degree of involvement of third parties in assessing the conformity of the product according to the relevant technical specification(s). For each product family, the system of AVCP is decided collectively by the member states and the European Commission. They do so, on the basis of the implications of the product on health and safety, on the particular nature and production process for the product itself.

AVCP – falls into 5 different "systems", which require varying levels of attestation, with 4 requiring the lowest level of certification, i.e. the manufacturer can self certify their factory production plan, and 1+ where the FPC must be certified by an external Certification Body.

As curtain wall is effectively manufactured on site, we are currently in discussion about who is

responsible for the CE Marking.

Doors and windows fall into the following categories:

Product	System
Doors/Windows With no safety devices (restrictors) or emergency requirements	System 3 E.g. manufacturer can self certify FPC
Doors on Escape routes with emergency or panic devices fitted	System 1 E.g. manufacturer must have the FPC inspected by a 3rd party certification body

Action for you – You will need to set-up a Factory Production Control (FPC) system in your business. The best known international standard for this is ISO 9001, however, to reduce costs you can get a notified body to audit a FPC system, you can self certify unless you are fitting doors on escape routes. The production records must be kept for 10 years. We believe this will be enforced by Trading Standards.

In Detail – What you Have to Declare and Document when you Install your Comar Products

So you will have to send out a DoP/CE Mark with every installed job, detailing the U-value; any dangerous substances on the product; if fitted - load bearing capability of any of the safety devices (retaining/reversing gearing, restrictors, fixing devices for cleaning regimes); on panic exit/emergency exits the ability to release. You do not need to have a DoP for each window on the project you may use the worse case e.g. the highest U-value, declaring this as "<1.8".

1. Dangerous Substances

This is a UK legality under REACH regulations. A Comar product does not, in normal use, emit/have any dangerous substances, however, you have to declare that it does not! To back this up you must have in your records COSHH sheets for the aluminium, hardware and gaskets which are available from us, but you will have to get COSHH sheets from your other suppliers e.g. glass supplier.

In this section of the DoP you can therefore insert "No dangerous substances"

2. Load bearing capacity of safety devices

You only need to declare this if they are fitted to the installed windows.
Again, if you have bought your safety devices from us, all of our technical manuals carry size and weight limitations of our systems, and this information is on all our test reports. If you do not buy your accessories from us you will need to get this information from your supplier (you cannot use our data) and re-test the window or door. This is not a test of the safety device per se; it is the test of the safety device on our product. Again, we would always recommend you buy your hardware from us as we offer a 10 year design warranty. If, you use our data and it is found that you have not used hardware from us you will be making a false declaration.

In this section of the DoP you can therefore insert

- On windows with no safety devices No Performance Declared or No Device Fitted
- On windows with safety devices = 350N (threshold figure from our test reports)

3. U-value/Thermal Transmission

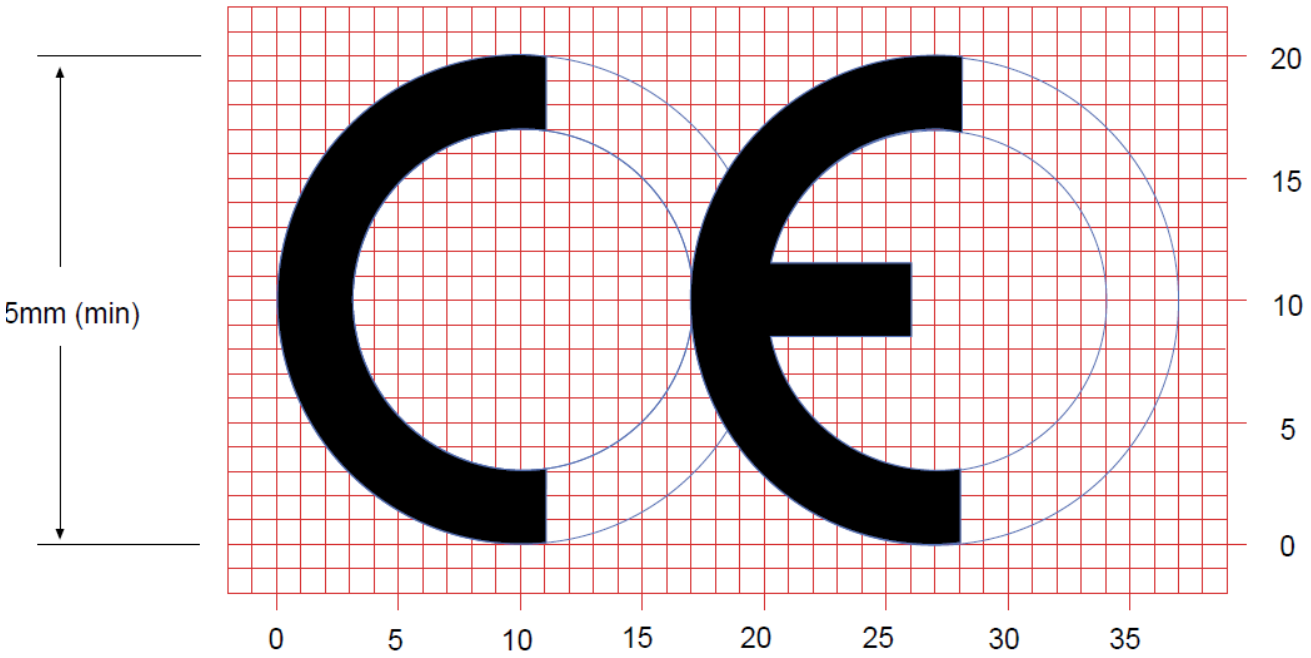
U-values or thermal transmission is a legal requirement in the UK Building Regulations. We have modelled/simulated all our profiles using EN ISO 10077-1 and EN ISO 10077-2. These are loaded onto our Genesis estimating programme with reports that you can keep for each project. You then must declare the highest window or door U-value on the DoP.

4. Ability to Release

All our Axim Panic Exit devices have a CE Mark as we sell these products in Europe. Here you must declare: the minimum threshold value of 350N.

Appendices

CE Logo, with positioning/size grid



Examples of Declaration of Performance (DoP's)

CE

Declaration of Performance

No:

Type:

Address:

Essential Characteristics	Performance	AVCP	hEN
Watertightnesss Non-Shielded		System 3 Notified Bodies performed the determination of the product-type on the basis of type testing (based on manufacturer), type calculation, tabulated values or descriptive documentation of the product; and issuing of the test/calculation reports under System 3	EN 14351 - 1:2010
Dangerous substances			
Resisteance to wind load: - Test pressure P1 - Frame defelction			
Impact resistance Drop height			
Load bearing capacity of safety devices			
Height			
Ability to release			
Operating forces			
Acoustic performance			
Thermal transmittance			
Radiation properties			
- Solar factor (g)			
- Light trasmittance (Tv)			
Air permeability			

Notified Bodies: [1] Notified Body A (9999) **[2]** Notified Body B (8888)

The performance of the products identified with the above unique identification codes are in condormity with the relevant declared performances.

This declaration of performance is issued under the sole responsibility of Name of company

Signed for and on behalf of the manufacturer by:

Name and function	Place and date of issue	Signature

CE

Declaration of Performance

Project code: ______________________________

Manufacturer: ______________________________

	Product List																	
Unique identification code:	DOEE130GO001		DOEGD001		DCHTTGV001													
Intended use:	Fire resisting exterior door		Fire resisting exterior door		Exterior door		Exterior door		Window		Window							
Essential Characteristics	Preference	Modified Data	Preference	Modified Data	Preference	Modified Data	Preference	Modified Data	Preference	Modified Data	Preference	Modified Data	Preference	Modified Data	Preference	Modified Data	AVCP	hEN
	EN 16034 2013		EN 16034 2013															
Fire resistance	EI 30	[4]	EI 30	[4]													System1	EN 16034:2013
Smoke control	S	[5]	S	[5]														
Self-closing	C5	[3]	C5	[3]														
	EN 14351-1:2010		EN 14351-1:2010		EN 14351-1:2010		EN 14351-1:2010		EN 14351-1:2010		EN 14351-1:2010							
Watertightness:																		
- Shielded (A)									SA	[2]								
- Test pressure (Pa)									600									
Watertightness:																		
- Non Shielded (B)	6B	[1]	6B	[1]	6B	[3]	6B	[4]			7B	[4]						
- Test pressure (Pa)	250		250		250		250				300							
Dangerous substances																		
Resistance to wind load:																		
- Test pressure P1	5	[1]	5	[1]	5	[1]	5	[2]	5	[3]	E2400							
- Frame deflection	A		A		A		A		B		C							
Impact resistance:																		
- Drop height (mm)	700	[1]	700	[1]	700	[1]	700		NPD		NPD							
Load bearing capacity of safety devices	NPD		NPD		NPD		NPD		NPD		NPD						System3	EN 14351-1:2010
Height (mm)	2200	.	2200	.	2200	.	2200	.										
Ability to release	NPD		NPD		NPD		NPD											
Operating forces	NPD		NPD		NPD		NPD		NPD		NPD							
Acoustic performance (dB)	NPD		NPD		NPD		NPD		37		NPD							
Thermal transmittance [V/m 2K]	1.2	.	1.3	.	1.3	.	1.4	.	1.1		1	.						
Radiation prperties:																		
- Solar factor (g)	0.58	.	0.58	.	0.58	.	0.58	.	0.45	.	0.59	.						
- Light transmittance (T.)	0.45		0.45		0.45		0.45		0.4		0.45							
Air permeability:	4		4		4		4		4		4							
- Max test pressure (Pa)	600	[1]	600	[1]	600	[1]	600	[2]	600	[1]	600	[1]						
- Reference permeability at 100Pa (m2/km2) cr (m2/hm)	3 OR 0.75		3 OR 0.75		3 OR 0.75		3 OR 0.75		3 OR 0.75		3 OR 0.75							

Notified Bodies: [1] Notified Body A (9999) **[2]** Notified Body B (8888)

The performance of the products identified with the above unique identification codes are in condormity with the re

performances.

This declaration of performance is issued under the sole responsibility of Metal Window Manufacturer Ltd / PO Bo

Signed for and on behalf of the manufacturer by:

Name and function	Place and date of issue	Signature

Dangerous Substances

To Whom it May Concern

15th February 2013

Dangerous Substances

"We declare that the Aluminium alloy profiles and gaskets used in the fabrication of Comar windows and door-sets are safe in use and that there are no potential emissions of dangerous substances to the internal atmosphere of a building"

The Parkside Group Limited is also committed to supply its customers with environment friendly products and is ISO 14001:2015 and BES6001 accredited. We also comply to REACH regulation. For the "SVHC candidate list" and as requested by article 33 of the regulation, The Parkside Group Limited will provide its customers with information about the chemicals of "very high concern" used in our products. First analysis results shows we do not use such substances.

Signed on behalf of The Parkside Group Limited

Simon J. Jones
Technical Director

Factory Production Control

Factory Production Control (FPC's)

For help with your FPC or if you decide to go down the ISO 9001 route we have the following options for you:

Accreditation Manager

Teresa Drewett is The Parkside Group Limited's Accreditation Manager and can give guidance on FPC's, ISO 9001, Kite-mark, Q Mark etc. Teresa can guide you through the processes from a basic FPC to full kite-mark and our 3rd Party Accreditation Schemes.

Contact Details

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