

# BSI clears up the CE marking confusion

*It is now a part of daily life for the window industry, but there is still an amount of confusion surrounding CE marking, says the BSI*

**U**nder the Construction Products Regulations (CPR) adopted by the European Commission and UK Government to replace the Construction Products Directive (CPD), CE marking became mandatory as of 1 July.

The Regulation applies to "any product or kit which is produced and placed on the market for incorporation in a permanent manner in construction works or parts thereof and the performance of which has an effect on the performance of the construction works with respect to the basic requirements for construction works."

In readiness for this, manufacturers, importers and distributors have had to ensure that their products meet the performance requirements of the harmonised European standard, be accompanied by a Declaration of Performance and will need to display the CE mark. However there have been a number of reports on the readiness of the door and window industry for CE marking, suggesting that sections of the industry appear to be confused about the process.

CE marking is not difficult, particularly if you fabricate PVC-U products and your system company provides the majority of the information to support your Declaration of Performance. There has also been some confusion over 'who' CE marks the product but again this is relatively simple, if you are the first person to place the complete product on the market and you sell it under your brand name then you are responsible for CE marking.

## EN 14351:2006 - A1:2010

External windows and doorsets are covered by EN 14351:2006 - A1:2010 and this identifies two main tasks, a documented Factory Production Control (FPC) and Initial Type Testing (ITT). There are three documents to prepare, a Declaration of Performance, the CE marking label and a



technical file that contains all the supporting evidence.

The windows and doorsets can be split into three groups by their intended use:

**1) locked doorsets on escape routes, 2) other doorsets and 3) windows.** Group 1,

which is likely to be a small part of your business, needs a Notified Body to assess elements of your FPC that addresses the purchase and installation of panic hardware, emergency exit devices and hinges. Groups 2) and 3) do not require any assessment of your FPC by a Notified Body. All three groups require the ITT evidence to come from a Notified Body, probably cascaded via the system supplier.

Micro enterprises, defined as a legal entity with fewer than 10 employees and a turnover of less than £2m, may use ITT evidence from any competent body for groups 2) and 3), but are still required to have their FPC assessed by a Notified Body if they manufacture product with an intended use of 'locked doorsets on escape routes'.

It is very difficult to understand your obligations without a copy of the standard but please remember that you are not CE marking against the whole standard, just the Annex ZA. EN 14351:2006 contains over 20 performance characteristics, however it is only those in Table ZA.1 that you can declare a performance against. You may choose not to declare some of these characteristics, instead using the term No Performance Declared (NPD). However, there are three where this is not the case. You must declare the actual performance for Dangerous Substances, Load Bearing Capacity of Safety Devices and Thermal Performance, as these are covered by building regulations or are threshold values in the standard.

In the majority of cases the evidence for the load-bearing capacity of safety devices can be cascaded by the System Company or hardware manufacturer, and dangerous substances will be covered via statements from the various component suppliers. The Thermal Performance can present a number of challenges even for the system companies due to the significant number of variation of glass units and frame members.

## Establishing thermal performance

Thermal Performance calculations need to be carried out or approved by a Notified Body and BSI has developed an innovative assessment and verification process that makes extensive use of the data generated under the Window Energy Rating schemes and the rules relating to historic data.

BSI is one of a limited number of Notified Bodies listed on the European website, NANDO, under the Construction Products Regulation and our scope includes EN 14351 covering all characteristics for doorsets and windows. We are pleased to have developed this client-focused approach that recognised the value of the many thermal simulations and u-value calculations that have been correctly performed by technically competent people.

The BSI Verified Thermal Performance Notified Body Service is designed to support the system houses and allows the performance data to be cascaded to all fabricators making it very cost effective and extremely flexible. Additional configurations and minor changes to the approved body of data are handled in a practical and non-bureaucratic manner giving further flexibility and added value. Following an on-site assessment by BSI and successful implementation of any required actions by the manufacturer results in a Notified Body Initial Type Test (ITT) report. Our approach covers the full range of doorset and window products which allows the manufacturer to make the appropriate declaration of Thermal Performance required by CE marking.

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