



18th April 2013 (PE)

UNDERSTANDING CE MARKING AND WHAT IT WILL MEAN TO YOUR COMPANY

Background

On 1st July 2013 the Construction Products Regulation (CPR) will come fully into force and therefore it will be mandatory for products covered by a Harmonised European Standard to have CE marking.

Under the CPR the whole supply and distribution chain must take responsibility and be aware of any essential characteristics or specific requirements to achieve CE compliance.

CE Marking, What is it?

CE marking permits fabricators to provide confirmation that their products are compliant with the Harmonised European Standard.

CE marking indicates the performance characteristics of the product; in essence the CE mark is a “passport” that enables a product to be issued legally within any market state.

CE marking only relates to product performance properties. It does not cover quality, aesthetics, local/national regulations or installation.

For windows and doors the CE marking is covered by the Harmonised European Standard BS EN 14351-1: 2006 & A1:2010.

For Curtain Walling the CE marking is covered by the Harmonised European Standard BS EN 13830:2003

This is implemented into UK law using the UK Construction Product Regulations (CPR)

HOW IT AFFECTS FABRICATORS

It is the fabricators responsibility to apply CE marking and declare that the product meets the “as tested criteria” As a supplier, Senior Architectural Systems do not CE mark.

Fabricators will need to have an auditable paper chase in place such as ISO9001 or a thorough in-house bespoke method so that they can prove compliance with the “as tested criteria”

The declaration is self certifying and can be based on system house testing, (ITT) or project specific tests.

WHAT ARE WE DOING?

Senior Architectural Systems (SAS) will issue all the necessary initial type testing data to ensure the applicable information required on your CE document can be applied.

Concise documentation will be issued for your use, which in turn will offer a compliant submittal to your client and subsequently the end user. This information is currently being compiled.

WHAT INFORMATION MUST BE DECLARED

The essential characteristics in the UK are:

- 1) Hazardous substances (See **note** below)
- 2) Thermal transmittance obtained via Logikal-Certification to follow
- 3) Load bearing capacity of loading devices if fitted

Note: “Senior Architectural Systems declare that our products, which are used in the manufacture of windows, doors and curtain walling, are safe in use and will not emit dangerous substances, compounds or particles into indoor or outdoor air, or release dangerous substances into drinking water, ground, or marine waters or soil”

For doors on an escape route you must also declare the ability to release and declare the escape hardware conforms to the following:

Emergency exit devices operated by a lever handle or push pad: Harmonised Standard EN 179

Emergency exit devices operated by a horizontal bar: Harmonised Standard EN 1125

Single axis hinges: Harmonised Standard EN 1935

Concealed overhead door closers are currently exempt from CE marking as there is no Harmonised Standard available.

All Fire Escape ironmongery supplied by SAS has the required test data and is CE marked.

PROCESS

As a fabricator you will need to comply with 3 main items:

- 1) Introduce, operate and maintain a Factory Production Control (FPC)
- 2) Produce a Declaration Of Performance (DOP)
- 3) Produce the actual CE mark (Certificate and/or sticker)

1) FACTORY PRODUCTION CONTROL (FPC)

SAS will write to you, authorising you as a fabricator to manufacture their products in accordance with the details set out in the fabrication manuals.

To verify this you will need to adopt a FPC that shows the operation from “goods in” to “goods out”. It will need to cover all aspects of the manufacturing process including ordering, stock control, fabrication and despatch. The system will require an individual to be responsible for operating and updating the FPC as and when necessary.

Generally the FPC does not require independent accreditation except where there is a “safety device” requirement. Panic/Fire Escape doors will fall under this category as they are deemed to involve a higher risk. SAS will be issuing the associated test data for these products and at this point your FPC will require independent accreditation/auditing. This can be obtained via a recognised body such as BM TRADA, BSI, BRE etc.

2) DECLARATION OF PERFORMANCE (DOP)

This documentation needs to be a basic form indicating performance information per specific project.

Mandatory Information:

- 1) Dangerous substances, standard response:
“Senior Architectural Systems declare that our products, which are used in the manufacture of windows, doors and curtain walling, are safe in use and will not emit dangerous substances, compounds or particles into indoor or outdoor air, or release dangerous substances into drinking water, ground, or marine waters or soil”
- 2) U value/Thermal transmittance
- 3) Load bearing capacity of safety devices, if none fitted state this.

Voluntary additional information, this could provide a commercial edge ??

- 1) Resistance to wind load
- 2) Water tightness
- 3) Air permeability

- 4) Operational forces
- 5) Mechanical strength
- 6) Glass photometric e.g. Light transmittance, G value
- 7) Acoustic properties e.g. 34Rw

AN EXAMPLE IS ATTACHED TO THIS LETTER

3) APPLYING THE CE MARK

Finally you will need to produce an actual CE document/sticker.

To obtain CE marking a product will be assessed relevant to its safety risk. A new term “Level of Attestation and Verification of Consistency of Performance” (AVCP) will be applied to products in 3 system levels.

System 1: This will need to be performed by an independent accredited body and covers windows and doors used in fire/smoke compartmenting and doors on an escape route.

System 2 & 2+: Are currently under review.

System 3: Can be self verified by the fabricator.

For windows and doors the CE marking is covered by the harmonised standard BS EN 14351-1:2006.

For Curtain Walling the CE marking is covered by the Harmonised European Standard BS EN 13830:2003.

The actual CE mark can be as extensive as you wish, as long as it's clearly visible on delivered items. A copy of the relevant D.O.P. must accompany all delivered items e.g. attached to the delivery notes, drawings e.t.c....

BENEFITS FOR A SPECIFIER

CE marking allows for clear comparisons between different suppliers so that informed choices can be made. The harmonised standards ensure that European trade is not discriminated against, helping to improve competitiveness. A CE marked product should be accepted on any market in the EU without requiring further testing or country specific tests or markings.

BENEFITS FOR A FABRICATOR

Performance requirements commonly form part of commercial contract specification. With CE marking this formalises the declaration of performance allowing a fabricator to certify based on System House Testing.

- > Allows fabricators to make a Declaration of Performance
- > Contractual requirements for performance can be achieved
- > Initialises and maintains Factory Production Control Procedures
- > Provided marketing opportunities

VERY IMPORTANT

Contract specific certification such as security is not covered by the CE scheme. Independent external audits such as the Q Mark scheme will still be required.

Supply only unglazed products cannot be CE marked, CE marking can only be applied if the entire “as finished” product is supplied. A D.O.P. will still be required by the purchaser but then only he/she can CE mark the product. In order for you to submit a D.O.P. the proposed glass U value must be declared by the purchaser.

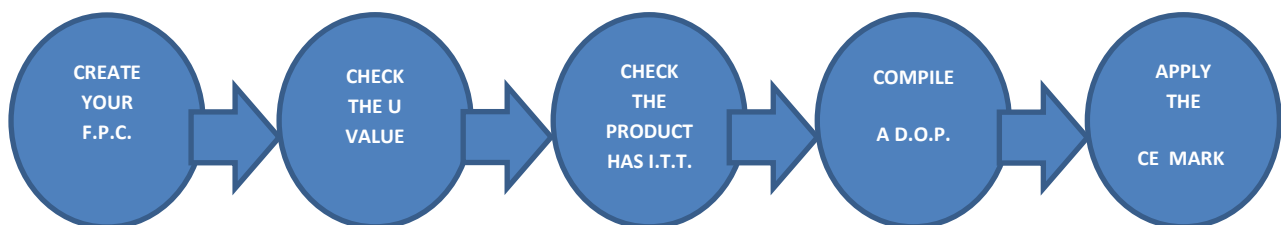
Remember, the CE marking only relates to product performance properties, mandatory contract duty of care requirements such as security, windloads, barrier loads etc. are still necessary.

DOCUMENTATION FOR YOUR USE

We will be issuing draft examples of a Declaration of Performance and the CE mark in word/excel format for your use and completion.

SUMMARY

For most companies there are 5 basic steps to comply with the new CE legislation. CE marking does require some effort, but this is summarised in the 5 steps as follows:



We will be issuing further information in due course but in the meantime please e- mail any queries to: Paule@seniorarchitectural.co.uk

