

BSI Update: Construction Products Regulation

Windows and Doors

What is the Construction Products Regulation (CPR) and how does it affect me?

Effective from July 2013, the Construction Products Regulation (CPR) will finally replace the Construction Products Directive (CPD). The most significant implication for you is that CE marking will become mandatory in the EU and the UK for those products covered by a harmonised European standard (hEN) or European Technical Assessment (ETA).

What will happen if you don't get your products CE Marked?

You will need to get your construction products CE marked in order to legally sell them anywhere within the EU, including the UK. In addition, the person signing an organisations declaration for a product is assuming legal responsibility for the conformity of the construction product with its declared performance.

How to attain product CE Marking

To apply the CE mark you first need to identify the applicable standards to which your products are manufactured. In the case of windows and doors, this is EN 14351-1 covering exterior non-fire and smoke related windows and doors.

What action do you need to take

You need to identify the relevant level of Attestation of Conformity for your products intended use, to establish what action you need to take. We can help you to identify this information, contact us or visit www.bsigroup.com/cpr to find out more.

If you have a system supplier, talk to them as they may have already identified the actions that need to be taken and may be able to cascade the information down to you.

What are Attestation of Conformity Systems

The level of Attestation of Conformity, called the verification of constancy of performance in the CPR, is set by the Commission for product families and can be found in Annex ZA of EN 14351-1.

There are five levels in total however for doors on escape routes system 1 is applicable and for all other doors and windows system 3. For all levels of Attestation of Conformity Initial Type Testing (ITT) is required and the manufacturer must also have factory production control (FPC) the extent of which is detailed in EN 14351-1. Whilst the standard has over 22 listed characteristics, only a limited number will apply for CE marking.

For the UK there are three characteristics covered by legislation or threshold limits, these are:

- Dangerous substances
- Load bearing capacity of safety devices
- Thermal transmittance.

The processes involved in attaining the level of Attestation and who is responsible for those tasks are shown in the Table 1.

Responsibility	Task	Attestation of Conformity				
		1+	1	2+	3	4
Manufacture	Factory Production Control	X	X	X	X	X
	Initial Type Testing			X		X
Notified Body	Initial Inspection	X	X	X		
	Continuous Surveillance	X	X	X		
	Initial Type Testing	X	X		X	
	Audit Testing	X				

Table 1 - showing responsibilities for each Attestation of Conformity system

- In all cases, a system of Factory Production Control (FPC) is required. The FPC is largely akin to a quality management system and the requirements are covered in the EN 14351-1. If your organisation already holds an ISO 9001: 2008 registration these requirements may be fulfilled by that system.

- For Attestation Systems 1+ and 1 you need to obtain an EC Certificate of Constancy of Performance issued by a Notified Body.
- For systems 1+ and 1, you will need to apply to a Notified Body to enable samples to be taken and ITT to be conducted by the Notified Body.
- For system 3 you will need an ITT report from a Notified testing laboratory

What do I do if I already have the Kitemark?

Kitemark covers CE marking in most cases. Please contact us to discuss your specific products and check that all of the relevant characteristics are covered by your Kitemark schemes.

When do I need to act to make sure that my products are ready for CE marking?

There is no simple answer to this as it is product specific and ITT requirements vary with some tests requiring several months for completion.

★ The sooner you act the more likely you are of meeting the 2013 deadline ★

Although the change does not fully take effect until July 2013 you should act now to ensure that you and your products are ready in time.

Simple steps to obtaining EC Certificates and Initial Test Reports

- If your Doors are intended for use on escape route (system 1) you need to apply to a Notified Body who can issue you with an EC certificate.
- If your Windows and Doors are system 3 they requires ITT to the relevant characteristics of EN14351-1 and you need to contact a Notified test laboratory or talk to your system supplier.

- BSI can act as a Notified Body for a many products including Doors and Windows that are systems 1+, 1, 2+ or 3. To speak to a representative and request a quote call us on 0845 0765 606.
- If you have any further questions regarding the CE process a BSI specialist can advise you. Call us on 0845 0765 606.



Further Information

To find out more about CE Marking and the Construction Products Regulation

Visit www.bsigroup.com/cpr

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