



COMPLIANCE WITH THE CONSTRUCTION PRODUCTS DIRECTIVE (CPD) FOR EXTERNAL DOORS & WINDOWS COVERED UNDER EN 14351 – 1:2006 AND THE REQUIREMENT FOR CE MARKING

Frequently asked questions about CE marking and a simple step-by-step guide on how to ensure your products comply with the CPD

Q: I've heard that compliance with the Construction Products Directive for external doors and windows under EN 14351 – 1:2006 will be mandatory in the UK from March 1st 2010, is this true?

A: Yes. Compliance with the Construction Products Directive will be mandatory within the UK from March 1st 2010. Owners of companies that do not comply will be at risk of prosecution.

Q: Will external doors and windows need to be CE marked from March 1st 2010?

A: For the moment CE marking will remain as it currently is i.e. voluntary within the UK but **mandatory in much of the rest of Europe**. However, compliance with the Construction Products Directive will still be mandatory.

Q: How do I ensure that my products comply with the Construction Products Directive?

A: The approved method to demonstrate compliance with the Construction Products Directive for external doors and windows is described in the European Standard EN 14351-1:2006 *Windows and external pedestrian doorsets without resistance to fire and smoke leakage characteristic*.

This lists a series of tests that may need to be undertaken. Once the appropriate testing has been successfully completed, the manufacturer then needs to prepare and retain a '**Declaration of Conformity**' which entitles them to affix a CE mark to their product. CE marking is not mandatory within the UK but it is a requirement for trading into much of Europe.

Q: How do I make sure my product complies with the product standard EN14351-1 and therefore the Construction Products Directive?

A: By following the steps outlined below:

1) Collect the relevant evidence:

The evidence you need to collect (and retain in a secure location) should be in the form of written documents. This evidence will typically include test reports and COSHH sheets.

Annex ZA of the standard EN14351-1 lists the characteristics of the product that you will need to have considered when gathering your evidence. However you will only have to gather evidence of compliance with those characteristics that are applicable to your particular product.

The six essential characteristics you will need to have considered comprise the following:

Thermal

Within the UK building regulations thermal performance is required. This normally consists of calculations based on EN ISO 10077-1 and EN ISO 10077-2. Sometimes, 'Hot Box' testing is required. This testing is carried out to EN ISO 12567-1 and EN ISO 12567-2. You will need to have evidence of performance in the form of a written technical report to demonstrate compliance with these standards.

Weathertightness

In the UK we test with reference to BS 6375 Part 1 which since the 2004 edition of the standard has referenced the European test methods to be used. This means that tests conducted since 2004 are likely to have been conducted in accordance with the appropriate EN test methods. You will need to have evidence of performance in the form of a written test report to demonstrate compliance with this standard.

Dangerous Substances

COSHH sheets for the product and elements should be retained which demonstrate that in normal use toxic or radioactive material are not emitted by the door or window.

Impact resistance (glass or fragmental material)

The recommended class for impact resistance of glazing within door and window systems in the UK is class 0. (Class 0 means no performance determined with respect to impact resistance). If class 0 is declared, no performance testing is required. If a higher class is declared, the door or window will need to be tested in accordance with BS EN 13049 and evidence of performance in the form of a written test report will be required to demonstrate compliance with this standard.

Load bearing capacity of safety device

Where a safety device is present (opening restrictor or similar device) it should have been tested on the window as described in EN 14351-1 and you will need to have evidence of performance in the form of a written test report to demonstrate compliance with this standard.

Ability to release (Exit devices)

Any emergency exit and panic devices fitted must have been tested and CE marked (typically by the hardware manufacturer) to relevant standards EN 179, EN 1125, prEN 13633 or prEN 13637. You will need to have evidence of performance in the form of a written test report to demonstrate compliance with the relevant standards.

Any other characteristics within EN 14351-1 (such as acoustic performance) will only be required when specified by specific projects in the UK. These characteristics are listed in Annex ZA of the standard. Again you will need to have evidence of performance in the form of a written test report to demonstrate compliance.

2) Ensure you have a factory production control system in place

You may already meet this requirement if you have an existing ISO 9000 (or equivalent) quality management system in place. If so, you will simply need to ensure that all relevant paperwork is complete and organized correctly. If you do not already have a documented factory production control system in place, guidance on the key considerations is contained in *TI-1007: CE Marking - Doors and Windows*.

3) Produce a Declaration of Conformity

Your Declaration of Conformity should contain the following:

- Name and address of the manufacturer and the manufacturing site
- Description of the product (type identification, use, etc.), and a copy of the information accompanying the declaration
- A list of the performance characteristics and classes achieved for the product from relevant evidence
- Limitations on or conditions applicable to the use of the product
- Name and address of the notified laboratory(ies)
- Name of, and position held by, the person empowered to sign the declaration on behalf of the manufacturer.

Q: I have already carried out testing. Can I use this test evidence for my Declaration of Conformity?

A: Yes, historical test evidence using valid European standards can still be used.

Q: Does CE marking replace third party quality marking or SBD?

A: No. Generally CE marking to EN 14351-1 is a self declaration by the manufacturer which verifies that the product meets the requirements of the Construction Products Directive and as such allows trade across Europe with fair comparison of performance characteristics. It does not act as independent proof of quality of manufacture.

Q: Where can I find answers if I have further questions?

A: You can either refer to the free copy of TI-1007 enclosed or contact Paul Andrews at Chiltern Dynamics on 01494 569 734 or email pandrews@chilterndynamics.co.uk.

