

The Construction Products Directive (CPD) is sometimes described as a 'New Approach' with the aim to create a single European market by removing the technical barriers to trade between member states through the use of harmonized standards and approvals.

Whilst this 'new' philosophy has been around since 1989 it is only with the harmonized standards for a particular product that the Construction Product Directive becomes effective. Since the introduction of EN 14351-1 the Construction Product Regulations are now applicable to windows and doors.

1989 European Construction Products Directive (89/106/EEC)

This European Directive introduced the concept of Harmonised Standards and with the intentions to mandate CE marking for construction products.

1991 UK Construction Product Regulations (SI 1991/1620)

Statuary UK Regulations that implement of the European Directive into UK Law.

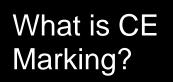
2010 BS EN 14351-1

Harmonised standard which allows the performance of windows and doors to be established and allows for CE Marking and declaration of values, subject to Initial Type Testing and Factory Production Control.

February 2010 the period of co-existence finishes when conflicting standards are removed.

2014 European Construction Products Regulations

Proposed European regulation to mandate all European countries to enforce the declaration though CE Marking.



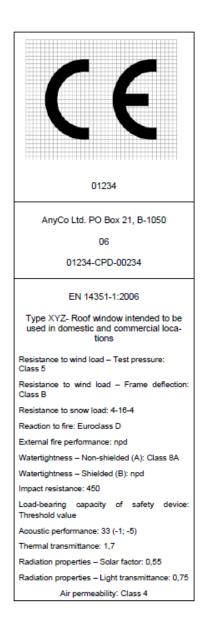
CE Marking applies to many products relating to many different market sectors children's toys, production machinery and now Windows and Doors. CE Marking indicates the performance characteristics of a product, in effect a CE Marking is a "passport" enabling a product to be placed legally on the market in any Member State. CE Marking indicates the performance characteristics of a product for the information of purchasers or users, but does not guarantee that the product is suitable for a particular purpose.

For windows and doors the CE Marking is covered by the harmonised standard BS EN 14351-1:2006. This is implemented into UK Law using the UK Construction Product Regulations 1991.

CE Mark declaration:

- ① Who manufactured the product
- 2 Which year the product was manufactured
- ③ Number of the European Standard
- ④ The declared performance of the product.

Unlike some other CE Markings (for toys or other products), a construction product CE Marking does not mean that the product meets absolute safety requirements. This is also not a quality standard but a declaration of product performance. The declaration is self certifying and can be based on system house testing, Initial Type Testing (ITT) or project specific tests. In order to make the declaration a Factory Production Control Procedures (FPC) such as ISO 9001 needs to be established, documented, maintained and internally audited.



Is CE Marking Mandatory?

As already stated for many different types of products in particular relating to safety such as machinery and toys CE Marking is already mandatory. At present the UK national laws implementing CE Marking for Construction Products do not explicitly mandate the CE Mark declaration for construction products sold into the UK, Finland, Ireland and Sweden.¹

The co-existence period for BS EN 14351 expires on February 2010² and this replaces any existing conflicting standards. BS 6375 has been updated and now references BS EN 14351. British Standards relating to Fenestration have generally been best practices which are not directly legally binding through legal regulations. For example BS 6375 was often used to establish contractual requirements or to prove fitness for purpose. The legal obligation to prove fitness for purpose still remains and BS EN 14351 can be used to prove fitness for purpose.

Although the CE Marking is not mandatory in the UK, the Construction Products Regulations are still legally binding for construction products. For product not bearing a CE mark the UK law does stipulate the declaration of 'reasonable performance values' to prove fitness for purpose.³

Products bearing the CE Mark

4. Any construction product which bears the CE Mark shall be presumed to satisfy the relevant requirement in regulation 3 unless there are reasonable grounds for suspecting that the product does not satisfy that requirement or that the CE Mark has not been affixed in accordance with regulation 5.

Requirement to give information about products which do not bear the CE Mark

7. A person who supplies a construction product which does not bear the CE Mark shall give to an enforcement authority, or any of its officers, all information which he has about the product and which the authority or officer may reasonably require for the purposes of ascertaining whether the product satisfies the requirement in regulation 3 (fitness for purpose) or is one to which these Regulations do not apply.

Extract: The Construction Products Regulations 1991, (SI1991 No. 1620)

There are future plans to enforce the disclosure of performance mandating CE Marking on Construction Products including windows. This was the initial objective of the 1989 European Directive and is one of the stated reasons for the proposed new European Regulation.

¹ Impact Assessment of the European Commission's proposed Construction Products Regulation, August 2009, Department for Communities and Local Government

² Commission communication in the framework of the implementation of the Council Directive 89/106/EEC on the approximation of laws, regulations and administrative provisions of the Member States relating to construction products (2009/C 152/05), July 2009, European Union

³ The Construction Products Regulations 1991 (SI1991 No. 1620), HMSO

Benefits for a Specifier

CE Marking allows for clear comparisons between the performance different suppliers allowing informed choices to be made. The harmonised standards that ensure European Trade is not discriminated against, helping to improve competitiveness. CE marked product should be accepted on any market in the European Economic Area without requiring further testing and country specific tests or markings.

CE Marking for a specifier

- Show where a product has been tested against a harmonised European standard.
- That the performance information being compared is reliable and by a notified body.
- Allows fair comparisons between different products.
- Ensures open trade and improves competition



Benefits for a fabricator

Because there is confusion about whether CE Marking is mandatory in the UK many companies could be missing the opportunities which self declaration and CE Marking today can offer a competitive edge.

Performance requirements commonly form part of commercial contracts specification and also provide marketing opportunities. With CE Marking this formalises the declaration of performance allowing a fabricator to certify based on System House Testing.

- Allows manufacturers to make a declaration on performance.
- Contractual requirements for performance can be met.
- Establishes Factory Production Control Procedures
- Provides marketing opportunities

Before BS EN 14351 product test reports such as Weather Performance Classification to BS 6375, BS 7950 by a Systems House often were used solely to prove the performance of the System for particular contracts.

Concerns with this simplistic informal approach are that there is no test on the competence of the fabricators procedures to ensure that the fabricated product achieves the performance tested. Contract specific certification is sometimes required alongside national schemes to improve accountability such as BSI Kitemark and BM Trada, Q Mark Scheme and Secure by Design these also certify the actual fabricator production procedures with an external audit.

Labeling and Marking

The CE Marking symbol as well as the accompanying information shall be affixed visibly, legibly and indelibly, in hierarchy of preference, on one or more of the following locations

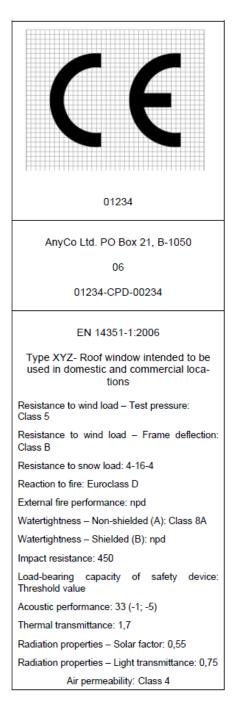
1) Any suitable part of the product itself.

Providing the visibility is ensured when the leaves, casements or sashes are opened;

- 2) on an attached label;
- 3) on its packaging;

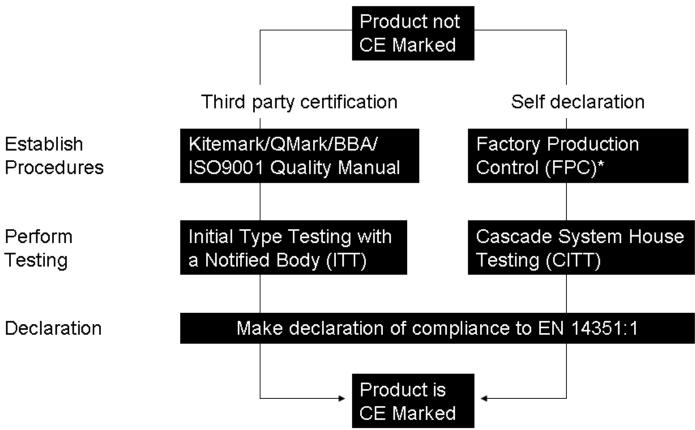
4) on the accompanying commercial document(s) or the manufacturer's published technical specification(s). Where the information is split (e.g. only the CE marking symbol appears on the product itself), the location(s) lower in the hierarchy shall repeat that part of the information already placed higher up in the hierarchy.

The fabricator shall provide sufficient information to ensure the traceability of their product (e.g. by means of product codes) giving the link between the product, the fabricator and the production. This information shall either be contained on a product label or detailed in accompanying documents or in the fabricator's published technical specification(s). Relevant designations of characteristics (see Clause 5) as well as information about intended use, handling, installation, maintenance and care (see Clause 6) shall either be contained on a product label or detailed in accompanying documents or in the fabricator's published technical specification(s).



Routes to Becoming CE Marked

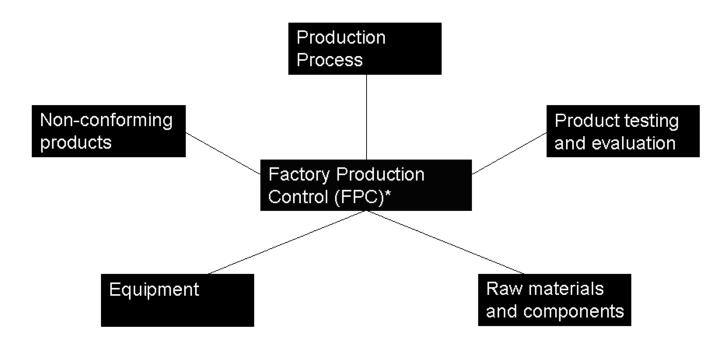
To become CE compliant a Fabricator must establish procedures and reference performance Initial Type Testing. This may either be through third part certification or self declaration. Initial Type Tests from a Systems House can be cascaded down the supply chain to a competent fabricator.



* The FPC should be assessed by a notified body for CE Marking Products of Attestation level 1



To CE Mark a product the fabricator shall establish, document and maintain a FPC system to ensure that the products placed on the market conform within the stated performance characteristics.



Production Process

To ensure consistence and accuracy of production, the FPC system shall document the production process involved.

This shall include

1) Identify the checking procedures at various stages of production.

2) The individuals responsible for all stages of production.

Record Checks/Corrective action

During the production process itself, a record shall be kept of all checks, their results, and any corrective actions taken.

This record shall be sufficiently detailed and accurate to demonstrate that all stages of the production phase, and all checks, have been carried out satisfactorily.

Product Testing/Inspection and Evaluation

The fabricator shall establish procedures to ensure that the stated values of all of the characteristics are maintained.

Regular Testing and Inspection

1) Test and/or inspection non-finished products or parts

2) Test and/or inspection the finished products.

Testing plan

Test and/or inspection shall be performed and evaluated in accordance with a test plan (including frequencies and criteria) prepared by the fabricator and in accordance with the performance characteristic in the CE Mark and any relevant test standards.

Raw Materials and Components

To ensure consistence of fabricated product the incoming/raw material should be checked for quality and defects which may effect the performance.

Maintain documents of material specifications

The specifications of all incoming raw materials and components shall be documented, Goods inward inspection

Document/maintain goods inward inspection scheme

Maintain Equipment

Weighing, measuring and testing equipment shall be calibrated and regularly inspected according to documented procedures, frequencies and criteria.

Regularly Inspect equipment

Manufacturing: Equipment used in the manufacturing process shall be regularly inspected and maintained to ensure use, wear or failure does not cause inconsistency in the manufacturing process.

Inspections and maintenance shall be carried out and recorded in accordance with the fabricator's written procedures and the records retained for the period defined in the fabricator's FPC procedures.

Handling of Non conforming products

The fabricator shall have written procedures which specify how non-conforming products shall be dealt with.

Any such events shall be recorded as they occur and these records shall be kept for the period defined in the fabricator's written procedures.

Initial Type Testing (ITT)

Initial type testing shall be performed to show conformity with BS EN 14351-1:2006. Performance through ITT for may be determined through calculation simulation testing or from tabular data dependent on the performance.

Initial Type Testing (ITT) Cascading Initial Type Testing (CITT) Further Type Testing (FTT)

Testing Weather Performance

EN 1026, Windows and doors - Air permeability - Test method EN 1027, Windows and doors - Watertightness - Test method EN 12211, Windows and doors - Resistance to wind load - Test method

Impact/Load Resistance Testing

EN 950, Door leaves - Determination of the resistance to hard body impact EN 947, Hinged or pivoted doors - Determination of the resistance to vertical load EN 948, Hinged or pivoted doors - Determination of the resistance to static torsion EN 949, Windows and curtain walling, doors, blinds and shutters - Determination of the resistance to soft and heavy body impact for door

Security Testing

ENV 1628, Windows, doors, shutters - Burglar resistance - Test method for the determination of resistance under static loading

ENV 1629, Windows, doors, shutters - Burglar resistance - Test method for the determination of resistance under dynamic loading

ENV 1630, Windows, doors, shutters - Burglar resistance - Test method for the determination of resistance to manual burglary attempts

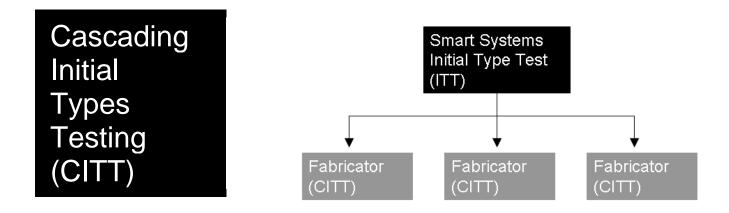
Testing Thermal Performance

EN ISO 10077-1:2000, Thermal performance of windows, doors and shutters - Calculation of thermal transmittance - Part 1: Simplified method (ISO 10077-1 :2000)

EN ISO 10077-2, Thermal performance of windows, doors and shutters- Calculation of thermal transmittance - Part 2: Numerical method for frames (ISO 10077-2:2003)

EN 14351-1 :2006(E)

EN ISO 12567-1, Thermal performance of windows and doors - Determination of thermal transmittance by hot box method - Part 1: Complete windows and doors (ISO 12567-1 :2000) EN ISO 12567-2, Thermal performance of windows and doors - Determination of thermal transmittance by hot box method - Part 2: Roof windows and other projecting windows (ISO 12567-2:2005)



It may not be necessary for each fabricator to re-test characteristics for which he can provide documentary evidence. Cascading allows a fabricator to use test results obtained from a systems company.

Provided that:

- The (CITT) report must be representative of the products for they are used to CE Mark against.
- The products are assembled are in accordance with Smart Systems technical manuals and supporting documentation to ensuring that there is no reduction in the stated performance values from the (CITT).
- Where the fabricator uses (CITT) reports from Smarts, he shall not be absolved from his responsibilities with regard to the product performance and compliance to BS EN 14351.
- If the product is not representative of the (CITT) then Further Type Testing (FTT) by the fabricator may be necessary.



Whenever a change occurs in the window and external pedestrian doorset design, the raw material or supplier of the components, or the production process (subject to the definition of a family), which would change significantly one or more of the characteristics (i.e. the design becomes dissimilar; see 3.4), the type tests shall be repeated for the appropriate characteristic(s).

Handling installation maintenance and care

When the installation is the responsibility of a third party the fabricator is not absolved of responsibility. The fabricator must provide sufficient information on the installation to ensure that the performance of the product is not compromised.

Installation instructions (for supply only)

The fabricator shall provide information

1) storage and handling

2) installation requirements and techniques (on site)

Maintenance and cleaning instructions

End use instructions including instructions on component replacement and safety in use instructions. (Particular attention to safety devices, power operated external pedestrian doorsets and Power operated windows).

Performance Profile Requirement Profile

The fabricator shall identify which characteristics have been determined and the level of performance declared. The characteristic shall be identified either by its title or by the reference number given in the first column of the appropriate table.

No.	Clause	Characteristic/ value/dimension		Classification/value C								
1	4.2	Resistance to wind load Test pressure P1 (Pa)	npd	1 2 (400) (800	3	4 (1600) (2000) Exxxx (> 2000)	5				
2	4.2	Resistance to wind load Frame deflection	npd	A (≤1/150)	(51)200	"	C (≤1/300)	В				
3	4.3	Resistance to snow and permanent load	npd	Declared information on the infill 4-16 4-16-4 (e.g. type and thickness of glass)								
14	4.14	Air permeability Max. test pressure (Pa) Reference air permeability at 100 Pa (m ³ /(h · m ²) or m ³ /(h · m))	npd	1 (150) (50 or 12,50)	(27 or 6,75)	3 (600) (9 or 2,25)	(3 or 0,75)	4				
Кеу												

No.	Clause	Characteristic/ value/dimension											Class/ de- clared value	
1	4.2	Resistance to wind load Test pressure P1 (Pa)	npd	1 2 (400) (800)		3 (120	0)	4 (1600)	5 (2000)			Exxxx 2000)		
2	4.2	Resistance to wind load Frame deflection	npd	A B C (≤1/150) (≤1/200) (≤1/300)										
3	4.3	Resistance to snow and permanent load	npd	d (e.g. type and thickness of glass)										
4	4.4.1	Reaction to fire	npd	F		E	D		С	В		A2	A1	
	4.4.2	External fire performance	npd				•	se	e EN 1350	1-5	•			
5	4.5	Watertightness Non-shielded (A) Test pressure (Pa)	npd	1 A (0)	2 A (50		4 A (150)	5 / (20		7 A (300)	8 A (450)	9 A (600)	Exxx (>600)	
6	4.5	Watertightness Shielded (B) Test pressure (Pa)	npd	1 I (0		2 B (50)	3 I (10		4 B (150)	5 B (200)		6 B 250)	7 B (300)	
7	4.6	Dangerous substances	npd					As	required b	y regulati	ons			
8	4.7	Impact resistance Drop height (mm)	npd	:	200		300		450		700		950	
9	4.8	Load-bearing capacity of safety devices	npd ^ª					Th	reshold val	ue				
10	4.11	Acoustic performance Sound insulation R _w (C;C _{tr}) (dB)	npd					De	clared valu	es				
11	4.12	Thermal transmittance $U_{\rm w}({\rm W}/({\rm m}^2\cdot{\rm K}))$	npd	Declared value										
12	4.13	Radiation properties Solar factor (g)	npd	Declared value										
13	4.13	Radiation properties Light transmittance (τ_v)	npd		Declared value							(Continue		

Table 1 — Classification of characteristics for windows

(Continued)

Table 1 (concluded)

No.	Clause	Characteristic/ value/dimension		de clar									Class/ de- clared value
14	4.14	Air permeability		1	1 2 3 4					4			
		Max. test pressure (Pa)	npd	(150)		(3	00)		(600)		(60	00)	
		Reference air permeabil- ity at 100 Pa $(m^3/(h \cdot m^2)$ or $m^3/(h \cdot m))$		(50 or 12,	50)	(27 o	r 6,75)	(9	or 2,25)		(3 or	0,75)	
15	4.16	Operating forces ^b	npd			1				2			
16	4.17	Mechanical strength	npd		1		2		3			4	
17	4.18	Ventilation Air flow exponent <i>n</i> Air flow characteristic <i>K</i> Air flow rates	npd	Declared values									
18	4.19	Bullet resistance	npd	FB1 F	B2	FB3	FB4	FB5	FB6	FB	7	FSG	
19	4.20.1	Explosion resistance Shock tube	npd	EPR	1		EPR2		EPR3		EP	R4	
20	4.20.2	Explosion resistance Range test	npd	EXR1		EXR	2	EXR3	EXR	4	E	XR5	
21	4.21	Resistance to repeated opening and closing Number of cycles	npd		5000			10 000		2	20 000		
22	4.22	Behaviour between different climates	npd				[To be	prepare	d]				
23	4.23	Burglar resistance	npd	1		2	3		4	5		6	
NOT	NOTE 1 npd: no performance determined. NOTE 2 The figures in brackets are for information.												

No.	Clause	Characteristic/ value/dimension	de clar									Class/ de- clared value		
1	4.2	Resistance to wind load		1 2		3	3			5		хххх		
		Test pressure P1 (Pa)	npd	(400)	(8	00)	(120)	0)	(1600)	(2	000)	(> 2000)		
2	4.2	Resistance to wind load		A (≤1/150)				B (≤1/200)			C (≤1/30	0)		
		Frame deflection	npd			-								
3	4.5	Watertightness												
		Non-shielded (A) Test pressure (Pa)	npd	1 A (0)	2 A (50)	3 A (100)	4 A (150)	5 A (200		7 A (300)	8 A (450)	9 A (600)	Exxx (>600)	
4	4.5	Watertightness												
		Shielded (B) Test pressure (Pa)	npd	1 B (0)		2 B (50)	3 E (100		4 B (150)	5 B (200)			7 B (300)	
5	4.6	Dangerous substances	npd					As r	equired by	/ regulat	ions			
6	4.7	Impact resistance												
		Drop height (mm)	npd	20	0	3	00		450	1	700		950	
7	4.8	Load-bearing capacity of safety devices	npd					Thre	eshold valu	Je				
8	4.9	Height and width	npd					Dec	lared value	es				
9	4.10	Ability to release	npd			See EN	N 179, E	N 112	5, prEN 13	633 or p	orEN 13	637		
10	4.11	Acoustic performance Sound insulation R _w (C;C _{tr}) (dB)	npd	Declared values										
11	4.12	Thermal transmittance U_{D} (W/(m ² · K))	npd	Declared value										
12	4.13	Radiation properties Solar factor (g)	npd	Declared value										

Table 2 — Classification of characteristics for external pedestrian doorsets

16

Table 2 (concluded)

No.	Clause	Characteristic/ value/dimension		de clare									Class/ de- clared value			
13	4.13	Radiation properties														
		Light transmittance (τ_v)	npd	Declared value												
14	4.14	Air permeability														
		Max. test pressure (Pa)	npd		1			2				3			4	
		Reference air permeability at 100 Pa $(m^3/(h \cdot m^2))$ or $m^3/(h \cdot m))$			(150) (300) (50 or 12,50) (27 or 6,75)			(600) (9 or 2,25)				500) r 0,75)				
15	4.16	Operating forces ^b	npd		1			2	2			3			4	
16	4.17	Mechanical strength	npd		1			2	2			3			4	
17	4.18	Ventilation														
		Air flow exponent <i>n</i> Air flow characteristic <i>K</i> Air flow rates	npd		Declared values											
18	4.19	Bullet resistance	npd	FB1	F	FB2	FB3	3	FB4		FB5 FE		FE	37	F\$G	
19	4.20.1	Explosion resistance Shock tube	npd	E	PR1		E	EPR	2		EP	R3		EPR4		
20	4.20.2	Explosion resistance Range test	npd	EXF	81		EXR2		E	XR3	R3 EXF		EXR4		EXR5	
21	4.21	Resistance to repeated opening and closing														
		Number of cycles	npd	5 000	100	00	20000		50000	10	0000	200000	50000	0	1000000	
22	4.22	Behaviour between														
		different climates														
		Permissible deformation	npd		1(x)° 2(x)° 3(x)°											
23	4.23	Burglar resistance	npd	1			2		3		4		5		6	
NOTE	1 npd:	no performance determine	ed.													
NOTE	2 The	figures in brackets are for i	nformat	tion.												
a Only if safety device(s) is (are) not provided.																
c Te	est climate	(a, b, c, d or e) shall be stated	l.													

	Components										
Characteristics		Weather ^b	Frame, casem	ent, sash, leaf	Glazing®						
	Hardware ^a	stripping	Material [®]	Profile ^d							
Resistance to wind load	(Y)	(Y)	Y	Υ	Y						
Resistance to snow load	Ν	Ν	N	Ν	Y						
Reaction to fire	(Y)	Υ	Y	(Y)	N						
External fire per- formance	(Y)	(Y)	(Y)	(Y)	(Y)						
Watertightness	(Y)	Y	(Y)	Y	N						
Dangerous subs- tances	(Y)	(Y)	(Y)	Ν	(Y)						
Impact resistance	(Y)	Ν	(Y)	(Y)	Y						
Load-bearing ca- pacity of safety devices	Y	Ν	Y	Y	N						
Ability to release	Y	(Y)	(Y)	(Y)	N						
Acoustic perfor- mance ¹	Ν	(Y)	(Y)	Y	Y						
Thermal transmit- tance	Ν	(Y)	(Y)	Y	Y						
Radiation proper- ties	Ν	Ν	N	Ν	Y						
Air permeability	(Y)	Y	(Y)	Y	N						
Operating forces	Y	Y	(Y)	(Y)	(Y)						
Mechanical strength	Y	Ν	(Y)	Y	(Y)						
Ventilation	N	Ν	N	Y	N						
Bullet resistance	N	N	Y	Y	Y						
Explosion resis- tance	Y	Ν	Y	Y	Y						
Resistance to re- peated opening and closing	Y	(Y)	(Y)	(Y)	(Y)						
Behaviour between different climates	N	(Y)	Y	Y	N						
Burglar resistance	Y	N	Y	Y	Y						

Table A.1 — Interdependence between characteristics and components

Key

Y Modification of the component will probably change the characteristic in question

(Y) Modification of the component will possibly change the characteristic in question

N Modification of the component will probably not change the characteristic in question

Products	Intended use(s)	Levels or class(es)	Attestation of conformity system(s)
	Fire/smoke compartmentation and es- cape routes		1
Doors and gates	On escape routes		1
Doors and gates (with or without related hard- ware)	Other declared specific uses and/or uses subject to other specific requirements, in particular noise, energy, tightness and safety in use		3
	For internal communication only		4
Windows (with or without related hard-	Fire/smoke compartmentation and on escape routes		1
ware)	Any other		3
	For uses subject to resistance to fire regulations (e. g. fire compartmentation)	Any	3
	For uses subject to reaction to fire regulations ^a	A1(*), A2(*), B(*), C(*).	1
		A1(**), A2(**), B(**), C(**),D,E	3
		(A1 to E)(***),F	4
Roof windows	For uses subject to external fire per- formance regulations ^b	Products requiring testing	3
		Products "deemed to satisfy" without testing (CWFT lists)	4
	For uses contributing to stiffening the roof structure	—	3
	For uses other than those specified above	—	3
	y shaded areas are for the completeness of the n Standard, see Figure 1.	Mandates. They are n	ot covered by this
System 1: See CPD An	nex III.2.(i), without audit testing of samples		
System 3: See CPD An	nex III.2.(ii), Second possibility		
System 4: See CPD An	nex III.2.(ii), Third possibility		
	for which a clearly identifiable stage in the production p		vement of the
	sification (e.g. an addition of fire retardants or a limiting	of organic material)	
	not covered by footnote (*)		
	hat do not require to be tested for reaction to fire (e.g.) on 96/603/EC, as amended).	products/materials of class	es An according to
a see Commission Decisio			
b see Commission De			
s acc commission De			