

## CE Marking ó How does it affect me?

### 1. **When?**

You can CE mark non-fire external doors and windows now, but CE marking most of these products will be mandatory from 1<sup>st</sup> July 2013 when the Construction Products Regulation comes into effect.

### 2. **Who has to CE mark?**

The legal entity who is placing the complete product on the open market. In the case of aluminium/PVC companies, this will be the system fabricator. The systems company cannot CE mark an incomplete product.

### 3. **What does CE marking give me?**

CE marking will be required to sell external door sets and windows (without fire performance) from, 1<sup>st</sup> July 2013 to allow free trade across the EU. A CE mark is not a guarantee of performance like your current 3<sup>rd</sup> party certification such as CERTISECURE or CERTIFIRE.

### 4. **What do I need to put in place?**

The following items will need to be on your CE declaration of performance:

#### a. **Factory production control system**

You will need to make a declaration that you have a factory production control system in place for level 1 AVCP, which will require a FPC visit by a Notified Body. For level 3 AVCP there is no requirement to have an FPC visit by a Notified Body. To have achieved CERTISECURE certification you will already have an FPC system in place and audited by Exova Warrington Certification, so you have already met this requirement.

AVCP = Assessment and verification of consistency of performance

#### b. **Dangerous substances**

Your declaration must also identify that no dangerous substances were used/produced during the manufacture of the product. There is no requirement to have this audited & monitored by a third party.

#### c. **Product testing**

All your test evidence you use in your declaration must have been gained with an independent Notified Test laboratory Body that is approved by UKAS to carry out the relevant tests such as Exova Warringtonfire. The only evidence that is currently mandatory to sell in the UK is:

- **Thermal performance (U-value)**
- **Load bearing capacity of safety devices (if any)**

If during the process of achieving your CERTISECURE certification you have carried out testing to BS63765-1 and BS6375-2 with a Notified Test Laboratory, you will have test evidence in place for watertightness, wind resistance and load bearing capacity of safety devices tests, and you can declare these in your declaration of performance of CE marking.

These test standards also call up European test methods for air permeability, operational forces, racking, static torsion, repeated opening and closing, and all of these can be declared on your declaration of performance if you wish. Or you can declare NPD (no performance determined); so long as you are not making any additional claim in your literature that your product has such a performance (e.g. acoustic, watertightness).

The only additional testing you may need to carry out will be the thermal performance, and this will have to be carried out by a physical test or a simulation by a European Notified Test Laboratory. Window energy rating simulations carried out by bodies that are not UKAS approved as a laboratory for thermal simulation are not accepted for CE marking. If your company employs a thermal simulator, by submitting your thermal simulation models and U-value calculations Exova Warringtonfire may be able to validate your existing thermal simulations and issue a Notified Body test report at a fraction of the cost carrying out full U-values simulations.

Test evidence from a manufacturer's own test facility will not be accepted for CE marking.

**5. Who applies my CE mark?**

You do. For an external product without fire or fire escape route requirements, it is the responsibility of you, the Legal entity/manufacturer to CE mark the product.

For level 1 AVCP you will need too Notified Body, for level 3 AVCP you only need the involvement of a Notified Test Laboratory.

**6. Further Information**

If you have any queries with the content of this technical bulletin, please contact Steve Weaver: [sweaver@winlock.co.uk](mailto:sweaver@winlock.co.uk)

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