

Frequently asked Questions

Q1) Can I use the greater than (>) and less than (<) symbols in conjunction with my declaration of performance on my Declaration of Performance (DoP) and CE marking, for example U Value = 1.6 W.m²/°K

Yes, however if you offer and market a product with a specific performance that is better and you make this better claim in your literature, then you must raise a new DoP. Note: This has been raised with the commission and we obtained a definitive answer.

Q2) Does the CE mark or label have to be permanent?

No, it shall be visible, legible and indelible.

Q3) Does the label have to have the year of manufacture?

No, the year that is stated on the CE marking label is the year that the mark was first applied to the product, this is normally the year that the DoP was drawn up or made.

Q4) Can the information such as the DoP be provided electronically?

The DoP may be made available on a web site but a simple link to the relevant DoP page must be clear.

Q5) How do we resolve the issue relating to Dangerous Substances?

All components must meet the requirements for Dangerous Substances. If your component supplier is unable to provide you with the relevant information then you may wish to consider changing supplier.

Q6) Will changing hardware mean that a new Initial Type Test (ITT) is required?

Not necessarily, if your agreement with your system company allows interchangeability and Annex A of EN 14351-1 indicates that changing a particular component will not affect the relevant characteristic, then you will not need to conduct further testing.

Q7) Can the DoP contain more characteristics than the mandated ones?

No, the characteristics that must be listed on the DoP are contained in Table 1 of the Annex ZA. All these must be listed but no more can be added.

Q8) If an installer buys complete windows and then markets them under their own name, does he have to produce a new declaration?

If the original CE marking remains unchanged and the DoP remains relevant then no, however if the installer removes the original CE marking and presents the product as their own then they will need to draw up a new DoP and take responsibility for the product.

Q9) If an installer adds a safety device before or during installation does he need to get new ITT, DoP and CE Marking?

Yes, any change to or addition of any hardware that affects the performance of an essential characteristic will require a new DoP supported by ITT.

Q10) How do they go about CE marking their escape doors? (i.e. who do they contact for test results or testing?)

They will need to employ a notified Body as this product falls under AVCP system 1. They will perform an initial visit and ongoing FPC assessments. If you have ISO 9001 then talk to your certification body.

Q11) Can a frame only manufacturer supply a completed DoP and CE Mark the product?

If the frame supplier wishes to take responsibility for the DoP and CE marking for the complete window he may subcontract the supply of the sealed unit, this may be via a IGU supplier or via an installer. In this scenario then the frame supplier remains legally responsible for the CE marking as they have signed the DoP. The frame supplier's FPC would need to include the relevant control of the subcontracted organisation and the subcontracted organisation also has the appropriate FPC system.

Q12) What constitutes a safety device?

It is the hardware manufacturer's responsibility to declare if the product is a safety device. If it is declared as a safety device then it must be tested.

Q13) Does CE mark apply to static homes or park homes?

It is not clear if the products intended for use in such applications are within the scope of the CPR. We will seek further advice.

Q14) Do we need to purchase a copy of the BS EN 14351-1 standard from BSI given that we might not understand it due to the fact that it is not in normal English?

It is essential to have a legal copy of the standard. This will enable you to understand the requirements for FPC and full details of the Annex ZA.

Q15) Can I use my WER U value data for CE marking?

If they have been generated by or approved by a Notified Body then you may use the WER U value data. Please check with the relevant Notified Body.