

## **CONSTRUCTION PRODUCTS REGULATIONS (CPR) & DOOR HARDWARE**

### **Construction Products Regulations (CPR) - Simplified**

The way in which construction products are sold in Europe will change significantly with the introduction of the Construction Products Regulations 2011 (CPR), which becomes mandatory from 1st July 2013.

CPR is replacing the existing Construction Products Directive (CPD), resulting in a change to the affixing of CE marking. Under the provisions of the existing CPD, CE marking is voluntary in the UK, however, under CPR, it becomes mandatory.

Under the CPR, it will become mandatory for manufacturers to draw up a Declaration of Performance (DoP) and apply CE marking to any of their construction products which are covered by a harmonised European standard (hEN) or conforms to a European Technical Assessment (ETA) which has been issued for it, when such a product is placed on the market.

The CPR is an extension to the provisions within the existing CPD, which will assist in reducing/removing current technical barriers which arise during trade in construction products within the European Economic Area (EEA). Main elements introduced to achieve this:

- System of harmonised technical specifications
- Agreed system of conformity assessment for each product family
- Framework of notified bodies
- CE marking of products

The transition for manufacturers already CE marking under the provisions of the existing CPD will be relatively straightforward.

Construction products which have been placed on the market and have the CE marking affixed in accordance with the CPD before 1st July 2013 are deemed to comply with the CPR.

A manufacturer may draw up a DoP on the basis of a Certificate of Conformity of Performance (CoCoP) or a Declaration of Conformity (DoC) which has been issued prior to 1st July 2013.

#### **IMPORTANT NOTE:**

Under CPR, a paper DoP has to be physically issued with every CE marked product sold. During 2014, however, rules will be brought in which will allow electronic copies to be available online. In the UK, Construction Products Association (CPA) has been working with Trading Standards in an attempt to find a way round this until the new rules are introduced in 2014.

They have come to an agreement where manufacturers/distributors that are members of trade associations affiliated to the CPA, can register their details through a CPA approved scheme and Trading Standards will grant official authority to those companies to offer their DoPs as downloadable from their websites as of 1st July 2013.

Unfortunately, only members of trade associations affiliated to CPA are eligible to sign up. The Guild of Architectural Ironmongers (GAI) is an affiliate of the CPA and has a scheme called PAA.

**CONSTRUCTION PRODUCTS REGULATIONS (CPR) & DOOR HARDWARE**  
**Implications & Responsibilities of Manufacturers/Importers/Distributors**  
**under Construction Products Regulations (CPR)**

As from 1st July 2013, construction products placed on the market in the UK and conforming to Annex ZA of a harmonised European Standard (hEN) or a European Technical Assessment (ETA) will have to be accompanied by a Declaration of Performance (DoP) and will need to have the CE marking.

A DoP must be created for each product that is covered by an hEN. Levers, cylinders and pull handles are exempt as cannot be CE marked. The declaration varies according to the particular harmonised technical specification covering the product. There are three ways in which information can be presented for each relevant characteristic:

- Confirmation of achievement of a minimum performance or threshold. This could be by satisfying a Pass/Fail criterion or simply by being eligible to be in the standard
- Actual performance (a declared value)
- Particular class of performance reached

Although the DoP supersedes the Certificate of Conformity of Performance (CoCoP) and the Declaration of Conformity (DoC) under the existing Construction Products Directive (CPD), it would be good practice to still have these documents available.

Existing CoCoPs (for products carrying CE mark prior to 1st July 2013) are worded as the current provisions under CPD, and these are still valid under CPR, until either the expiry date on them elapses or they are revalidated and reissued by the official notified body.

A manufacturer may draw up a DoP on the basis of a CoCoP or a DoC under the existing CPD which has been issued prior to 1st July 2013.

**IMPORTANT NOTE:**

Under the CPD an assumption was made that manufacturers sell their products to the end user. In reality, a manufacturer may well put their product into a supply chain, not knowing the product's destination or end use.

An importer or distributor is considered a manufacturer under the CPR where they place a product on the market under their company name or trademark, or modify a construction product already placed on the market in such a way that conformity with the DoP may be affected. It is their legal responsibility to produce a DoP for that product. They cannot use the DoP from whom they are supplied.

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In the UK, Construction Products Association (CPA) has been working with Trading Standards in an attempt to find a way round this until the new rules are introduced in 2014.

They have come to an agreement where manufacturers/distributors that are members of trade associations affiliated to the CPA, can register their details through a CPA approved scheme and Trading Standards will grant official authority to those companies to offer their DoPs as downloadable from their websites as of 1st July 2013.

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## **CONSTRUCTION PRODUCTS REGULATIONS (CPR) & DOOR HARDWARE**

### **Responsibilities of Importers/Distributors who “Own Brand” under Construction Products Regulations (CPR)**

Under the Construction Products Directive (CPD), an assumption was made that manufacturers sell their products to the end user. In reality, a manufacturer may well put their product into a supply chain, not knowing the product's destination or end use.

As from 1st July 2013, an importer or distributor is considered a manufacturer under the Constructive Products Regulations (CPR) where they place a product on the market under their company name or trademark, or modify a construction product already placed on the market in such a way that conformity with the original Declaration of Performance (DoP) may be affected. It is their legal responsibility to produce a DoP for that product. They cannot use the DoP from whom they are supplied.

The CPR adds responsibilities to importers and distributors who must assure themselves that the manufacturer has undertaken all that is required.

A DoP must be created for each product that is covered by a harmonised European Standard (hEN). Levers, cylinders and pull handles are exempt as cannot be CE marked. The declaration varies according to the particular harmonised technical specification covering the product. There are three ways in which information can be presented for each relevant characteristic:

- Confirmation of achievement of a minimum performance or threshold. This could be by satisfying a Pass/Fail criterion or simply by being eligible to be in the standard
- Actual performance (a declared value)
- Particular class of performance reached

Although the DoP supersedes the Declaration of Conformity (DoC) under the existing Construction Products Directive (CPD), it would be good practice to still have these documents available.

#### **IMPORTANT NOTE:**

Under CPR, a paper DoP has to be physically issued with every CE marked product sold. During 2014, however, rules will be brought in which will allow electronic copies to be available online.

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## **CONSTRUCTION PRODUCTS REGULATIONS (CPR) & DOOR HARDWARE**

### **Implications of Door Hardware Specification & Non-CE Marked Products under Construction Products Regulations (CPR)**

The Construction Products Regulations (CPR) covers every single product that is used in construction. Unfortunately, due to the nature of individual product groups, reading the document in full can be somewhat confusing.

With regards to door hardware, the main impact on our industry is the requirement that all door hardware, covered by a harmonised European Standard (hEN) or European Technical Assessment (ETA) to be fitted to fire and escape route doors (manufactured from 1st July 2013), must carry the CE mark. Levers, cylinders and pull handles will however, still remain exempt from CE marking.

Under the CPR, it is a legal requirement that any door hardware covered by an hEN or an ETA fitted to "Fire and/or Escape Route" doors after 1st July 2013, must carry the CE mark. Door hardware fitted to any other door that is not a fire and/or escape route does not have to carry the CE mark, even if there is an hEN or ETA covering the product.

#### **FACTS ABOUT CE MARKING OF DOOR HARDWARE UNDER CPR:**

- CE marking under the CPR does not mean you have to scrap products that are used on non-fire or non-escape route doors
- Locks, door closers, electro locks, co-ordinators, that are used on fire doors will have to be CE marked
- Hinges, panic exit devices, emergency exit devices that are used on fire doors or escape route doors (which are sometimes not fire rated) will have to be CE marked
- Final exit doors (which could be an escape route) might have a door closer fitted (floor spring or transom) glass doors out of buildings, these are not fire rated so the closer does not have to be CE marked
- Lever handles, cylinders and pull handles are exempt from CE marking, but can be used on fire doors and escape doors
- Products sold that are not for use on a fire or escape door, do not need to be CE marked

When considering the specification and suitability of door hardware, follow the simple rules below:

Fire and escape route doors - All Hardware which is covered by an hEN or conforms to an ETA, **must be CE marked**

Any other doors - All hardware, even when covered by an hEN or conforms to an ETA, **does not have to be CE marked**