



Guidance Document GD 05

July 2013  
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## C E MARKING – ANSWERS TO COMMON QUESTIONS

### BREXIT STATEMENT

Since the original publication of this document the United Kingdom has voted to leave the European Union and this has inevitably raised the question of whether Brexit will influence the future use of CE marking and the use of hENs and CUAPs in the United Kingdom.

European standards and the associated framework will continue as part of the BSi work programme. The following statement from BSi provides confirmation of their future programme:

*Following the triggering of Article 50, BSI will continue to help organisations achieve their goals as we have done for the past 116 years.*

*For BSI it is business as usual; BSI will remain a full member and influential participant in the single European Standards system as well as an EU Notified Body. BSI will continue to play an important role in helping both British and overseas firms demonstrate product conformity.*

*As negotiations progress and our discussions with the UK government and other relevant authorities evolve, we will continue to keep you informed on progress on both this page - <https://www.bsigroup.com/en-GB/about-bsi/media-centre/BSI-and-Brexit/> and other communications*

**Q1 Do MCRMA member companies comply with the Construction Products Regulations?**

Member companies within the Metal Cladding and Roofing Manufacturers Association (MCRMA) recognise and understand the requirements set out in the Construction Products Regulations 2011 (CPR) and where applicable provide a Declaration of Performance (DoP) and issue or affix a CE mark to all individual products or components that form part of a recognised system

**Q2 Do all construction products have to carry a CE mark?**

No, only products subject to a harmonised European standard known as a hEN are obliged to carry a CE mark.

**Q3 If a product carries a CE mark will it be more expensive than the same category of product without a CE mark?**

If the product category is covered by a harmonised European standard then all products in that category, from whoever manufactures or supplies that product category must carry a CE mark and therefore issuing or affixing a CE mark will not add any differential cost to the product.

**Q4 Can a CE mark be applied to a product through any other approval system?**

Yes, a CE mark can be applied to a product if the manufacturer or distributor has obtained a European Assessment Document (EAD), formally known as a European Technical Approval (ETA), based on a Common Understanding and Assessment Procedure (CUAP).

**Q5 Is it mandatory for a manufacturer or distributor to obtain an EAD for a product covered by a CUAP?**

No, obtaining an EAD against a CUAP is voluntary.

**Q6 If a manufacturer or distributor does not have an EAD in place for a product can he affix a CE mark to the product?**

No, if an EAD is not in place for the product then the manufacturer or distributor may not issue or affix a CE mark to the product because the process is not obligatory.

**Q7 If a manufacturer or distributor has an EAD for a product based on a CUAP does he have to issue or apply a CE mark to the product?**

Yes, if the manufacturer or distributor has an EAD in place for a product covered by a CUAP then a CE mark has to be issued or affixed to the product.

**Q8 If a construction product doesn't carry a CE mark does it mean that the product is inferior?**

No, it generally means that there isn't a harmonised European standard or EAD available for the product. In most cases the product will conform to a National or European standard and the manufacturing company will have detailed QA records. However, you must ensure that the product is fit for purpose.

**Q9 Is a CE mark product specific?**

Yes, the hEN or CUAP will describe the product, set out the performance standards which it has to meet including any testing and evaluation and also detail the information which has to be issued with the product as part of the DoP and CE mark.

**Q10 Does a composite panel have to comply with a hEN?**

Yes, a composite panel is covered by *BS EN 14509 Self-supporting double skin metal faced insulating panels. Factory made products. Specifications.*

**Q11 Do roofing and/or cladding sheets have to comply with a hEN?**

Yes, roofing and/or cladding sheets are covered by *BS EN 14782 Self-supporting metal sheet for roofing, external cladding and internal lining. Product specification and requirements.*

**Q12 Are the other components which are associated with composite panels and twin skin systems such as fasteners, sealant, rooflights etc. covered by BS EN 14509 or BS EN 14782?**

No, the associated products may be covered by their own hEN or EAD or in some cases they are not covered at all and therefore cannot be CE marked.

**Q13 How can I establish if products used within a roofing and cladding assembly require a CE mark?**

Contact the manufacturer or distributor for the product via the MCRMA web site or contact the MCRMA directly for advice.

**Q14 Where is the most likely place for me to find a CE mark on a roofing or cladding product?**

It depends upon the product. For small items, it could be affixed to the box or packaging and for large items, it may be affixed directly to the product. However, it is most likely to be included or attached to the delivery note. In some cases, there may be a need to follow the instructions accompanying the delivery note which will lead you to the information on the company web site.

**Q15 Who should I contact if I suspect that a construction product should have a CE mark but I cannot find evidence of the mark?**

Trading Standards administer the Construction Products Regulations. The manufacturer is responsible for the issuing or affixing of a CE mark to the product. Details of your local Trading Standards office can be found at <https://www.gov.uk/find-local-trading-standards-office>

**Q16 Will a CE mark provide me with a guarantee?**

A CE mark indicates that the product meets with a recognised and regulated European standard or assessment process; it does not offer any additional guarantee.

**Q17 Who should I contact if I suspect that a construction product is carrying a CE mark that is not correct or false?**

Trading Standards administer the Construction Products Regulations. The manufacturer is responsible for the issuing or affixing of a CE mark to the product. Details of your local Trading Standards office can be found at <https://www.gov.uk/find-local-trading-standards-office>

**Q18 Should I only specify construction products which carry a CE mark?**

If a product is covered by a hEN or a voluntary EAD then the manufacturer or supplier is obliged to issue or affix a CE mark. However, if the product is not showing a CE mark it generally means that there is neither a harmonised European standard or EAD available for the product. In most cases, the product will conform to a National or European standard and the manufacturing company will have detailed QA records. However, you must ensure that the product is fit for purpose.

**Q19 Does a rooflight have to comply with a harmonised standard hEN?**

In plane rooflights should comply with BS EN 1013; barrel rooflights are dealt with in BS EN 14963 and dome rooflights are dealt with in BS EN 1873.

**Q20 Are fasteners for composite panels and twin skin cladding systems dealt with in the same harmonised standard?**

No, fasteners for composite panels are covered within CUAP 06.02/12 and fasteners for twin skin cladding systems are covered within CUAP 06.02/07.

**Q21 I have been informed that a composite panel is the only roofing and cladding system that can be CE marked. Is this true?**

No, this is not true. The CE marking of a composite panel is covered by BS EN 14509 but the associated products which make up the total system, such as the fasteners and rooflights, are dealt with by their own hEN or CUAP with the associated EAD.

As for the sealants used to weatherproof the joints between panels during the construction phase, these cannot be CE marked because currently there is no hEN or CUAP for the product.

**Q22 I have been informed that twin skin roofing or cladding systems cannot be CE marked. Is this true?**

A twin skin roofing and cladding system is made up of many different component parts and the nature of the system is such that specific hENs or CUAPs have been developed for the individual components to ensure that they meet their specific needs.

Roof and wall cladding sheets are covered by BS EN 14782; in plane rooflights are covered by BS EN 1013; fasteners are dealt with in CUAP 06.02/07 and spacers are addressed in CUAP 04.01/12. In addition, insulation is dealt with in EN 13162:2008 and, as with composite panels; there is no harmonised standard or specialist CUAP for sealant.

**Q23 Where can I get more information about CE marking?**

Specific information about hENs and CUAPs which relate to products, components and systems for roofing and cladding can be found on the MCRMA web site at <http://mcrma.co.uk/ce-marking>

Information is also available from the European Organisation for Technical Approvals (EOTA) at <https://www.eota.eu/en-GB/content/home/2/185/>

A useful guide to CPR is available from the Construction Products Association which can be downloaded at <http://www.constructionproducts.org.uk/publications/industry-affairs/display/view/construction-products-regulation/>

**Q24 Where can I find more information about current hENs and the products they cover?**

All current hENs are listed in the Official Journal of the European Union which can be found at <http://ec.europa.eu/enterprise/policies/european-standards/harmonised-standards/construction-products/>

**GLOSSARY**

CPR	Construction Products Regulation
CUAP	Common Understanding of Assessment Procedures
hEN	Harmonised European Standard
EAD	European Assessment Document
ETA	European Technical Assessment
DoP	Declaration of Performance

## **FURTHER GUIDANCE**

If you cannot find the answer to your question here, please contact MCRMA on 01633 895633 or via the technical hotline on the MCRMA web site at <http://www.mcrma.co.uk/contact.htm>

## **DISCLAIMER**

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