



CENSolutions Press Cuttings

Quarter 1 2013

Glass & Glazing Products (January)

GREAT DEBATE

What's the point of trade associations?

Mike Gaillard, joint managing director of consultancy and test facility CENSolutions, uses this Speaker's Corner to discuss the tough role trade associations need to play.

For those of you who know me, you will have read the title of this piece and will now be expecting some form of anti-federation, association, or certification body/supplier sentiment.

Well, it may surprise you but there will not be – well, maybe just the odd bit of constructive criticism. This change of tack could be to do with

organisation founded and funded by businesses that operate in a specific industry whose main focus is collaboration between companies or standardisation. Its role is to participate in public relations activities such as advertising, education, political donations, lobbying and publishing to promote best practice, set technical and health and safety standards and shape and influence policy and legislation.

Downstream in the chain, we have the certification suppliers, those responsible for ensuring this best practice becomes implemented. These organisations carry the serious role of assessing and verifying that the characteristics and quality of individuals or organisations, goods or services, procedures, or processes are in accordance with established requirements or standards.

This all sounds great in theory but in practice, like any organisation, the associations and certification suppliers can vary significantly. The fenestration industry is lucky – or unlucky – to have many

associations; some more active than others and a number of larger and smaller certification suppliers: some more accurate and helpful than others.

THE REALITY

When it comes to trade associations, including the GGF, British Plastics Federation (BPF), British Woodworking Federation (BWF), Council for Aluminium in Building (CAB) and Steel Window Association (SWA) who are there to look after the interests of their members and indeed, the broader industry as a whole, there are noticeable gaps in communications from some of them.

While I am always among the first to say the GGF could, for example, have done something better, or more quickly, at least it does play its role and raises its head above the parapet. This

contrasts with some of the others that appear to ignore members and do not even seem to have views, never mind air them publicly, on some of the most important issues affecting the future of our industry.

Take CE Marking. The mandatory 1 July 2013 introduction of CE Marking is going to have a massive impact on every company in our supply chain, from installer to fabricator to IG manufacturer.

While the GGF may have been slower than I had hoped to educate and start helping companies understand and get ready for this new standard, at least it already has a practical and comprehensive system in place. Where are the others? In return for often hefty fees, what advice are their members receiving?

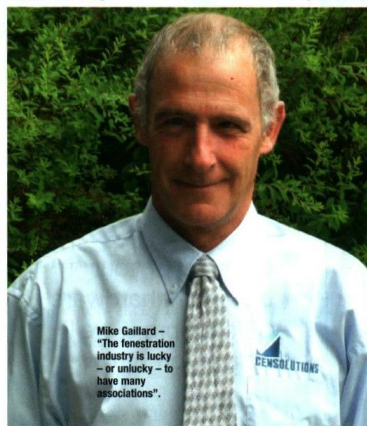
In terms of certification suppliers, while some have actively embraced their industry, others have remained mysteriously silent. One manufacturer told me recently that a client manager from one of the larger certification suppliers, had been to see them for an audit and a meeting to discuss CE Marking and the client manager had actually asked the manufacturer themselves to explain the changes to him.

Maybe it is this widely varying contrast in service levels offered by the different bodies and suppliers, that has made me realise we should not lump everyone together when it comes to praising or criticising. However, I understand how lethargy and cynicism can so easily slip in among the very companies we are supposed to be representing and helping when they see little return for their subs, or decisions being taken that are driven by individual or commercial gain rather than for the good of the industry as a whole.

As an extremely active member of the GGF for years, I am perhaps closer than most to see the huge amount of work that goes on to support our industry, especially when it comes to legislation, both instigation and compliance and I have had the pleasure of working with some of our industry's most passionate and knowledgeable individuals.

Just as my company was established to help companies make sense of all relevant systems, standards and legislation with which they must comply, the GGF has always been and will continue to be, an integral part of this process.

For further information, visit the website: www.censolutions.com



Mike Gaillard – "The fenestration industry is lucky – or unlucky – to have many associations".

having gone around the block a few times, or maybe it is an increase in awareness of the difficult role the Glass and Glazing Federation (GGF) and its working groups, for example, have to play that have made me review my stance, although I am disappointed at the general lack of advice from all other bodies and suppliers.

Either way, as a representative of CENSolutions, I can firmly say I have never set out to make either enemies, or friends in the industry for commercial gain. Our organisation is pragmatic and objective and we just ask the difficult questions and then tell it how it is according to the 1,000 or so companies we work with every year.

DE FACTO

The official definition of a trade association is an



The Glazine – 22nd January

Dear Tony

22nd January 2013

Whilst we appreciate Richard Bate's expert opinion and interpretation in his letter last week, we feel that perhaps his vested interest as a Notified Body may have clouded his opinion. Other expert opinions have been sought and, although they agree with many of his comments, they also feel that he has missed a number of areas, including interpretation for the inclusion of these hEN Standards into UK law.

The following summarises opinions received from several leading independent sources in respect of some of Richard's comments:-

Re: The article in general.

Response – "I would agree that Richard should declare a vested interest here – i.e. Build Check is a Notified Body and would benefit financially from this proposal. This often will appear in a footer or somewhere so as to not mislead the reader."

Re: The simplified tables within ISO 10077-1:2006 which provide a default U-value are not a practical or acceptable method to make a Declaration of Performance for a CE Mark unless verified by a Notified Body. Also, the tables only apply to single light windows and do not cover any type of door.

Response - "Richard's statement is not correct – this simplified approach is exactly what the CPR suggests is suitable for micro enterprises. Discussing with other Countries this is their interpretation, use the defaults which requires looking up tables or graphs and you can make your declaration with no use of a notified body." Furthermore, we understand that in countries where CE Marking is already operational, such defaults are routinely used without reference to a notified body.

Re: But companies using these "simplified procedures" must demonstrate they have followed applicable procedures for verifying thermal transmittance. In practice, it's often easiest to do



this is with ITT data from a Notified Body.

Response - "This is a personal opinion! In reality, to follow the tables within BS EN ISO 10077 1 should not be a problem for most people. Regardless of the use of a Notified Body, Consultant or Trade Association the declaration will still be the responsibility of the manufacturer."

CENSolutions believe that, with regards to thermal transmittance, CE marking may be accomplished by making a declaration by using the tables in EN 10077 to provide very conservative values. Please remember that, unlike UK Building Regulations, CE marking set no target value to meet. As a quite separate operation, compliance with current Building Regulations may be accomplished by use of already accepted methods such as BFRC Window Energy Ratings or other approved methods. Similar Declarations of Performance are being adopted by major manufacturers in relation to other hENs' such as EN 12150 and EN 1279.

CENSolutions are not looking at commercial gain from the confusion being created. We are predominately interpreting these standards and assisting the industry coming up with simple yet cost effective solutions. It is also a shame that we have reached this late stage and confusion still reigns. Especially after all our efforts during the past five years when we have regularly highlighted the requirement to CE Mark, much to the derision of many.

Yours

Wayne Rogerson, CENSolutions



GGP Bullseye – 15th January

Stop The Scaremongering!

Wayne Rogerson, CENSolutions, via email.

Dear Sophie

CENSolutions has become increasingly concerned about the information which is being provided to the industry regarding EN 14351 and CE Marking. We strongly believe that certain organisations are using CE Marking as a means of scaremongering in an attempt to take advantage of the changes to line their pockets commercially. One organisation is stating that WERs will no longer exist and U- values will take over. This we see as complete nonsense. WERs and DSERs are the most cost effective and user-friendly means of demonstrating compliance with UK Building Regulations, and if used, enable a very simple route to CE Marking under CPR using default values contained in BS EN ISO 10077-1 for declaring U-values.

As always, we will be more than happy to talk to anyone who still has concerns or questions about the situation and wants to get the real facts rather than the fiction surrounding CE Marking. For further information, please call: 01785 716625 or email: info@censolutions.com

Yours sincerely

Wayne Rogerson, Joint MD, CENSolutions

Glass Times – March

[EN 12150]

It's your name on it!

With more legislation about to hit our industry in the form of mandatory CE Marking and new building regulations, Mike Gaillard, joint managing director of CENSolutions, is concerned that with respect to EN1279, while the industry may be aware of the relevant six parts, many companies are unaware of the requirements for the correct way to claim performance to the standard, even with apparent advice from some certification providers and auditors. This is also particularly pertinent when it comes to toughened glass.

It doesn't matter who your certification body is – whether Kitemark, Q-Mark, BBA or CMS Mark – when declaring compliance to the relevant European Standard (EN 14351, EN 12150, EN 1279, EN 14449) it is the manufacturer that is making the claim.

It is solely his declaration and he must be confident that he is fully compliant to the standard as it's the manufacturer who is legally responsible, although the certification provider may morally be complicit in the offence.

However, in respect to



toughened glass there is still great confusion. Many manufacturers are currently claiming compliance or being certified to "Safety Glass in Buildings to EN 12600" in the belief they are fully compliant. This may not be the case as

EN 12600 is a test method (soft body impact test) and is only part of the harmonised standard EN 12150 to which most mark their glass to satisfy UK Building Regulations.

EN 12150 is the European Standard with which the manufacturer has to comply, and by marking their glass EN 12150, manufacturers may be innocently making a false claim in that they may not have had all the Initial Type Testing, ie, Surface Stress testing (often referred to as four point bend testing), or be doing all the in-process testing that is required.

Unfortunately, every day I see companies being let down by their audit partners and/or certification providers who should be informing them of their non-compliance.

It is important to break the myth that having a certification mark means you comply. Unfortunately with bad advice being offered by certain industry certification providers, it puts the onus back on the manufacturer to understand the relevant legislation themselves, or find a partner that will ensure 100% compliance on their behalf.
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Glassi – March



Glass and Glazing Federation

Welcome to the March issue of Glassi – the digital magazine for GGF Members only. In this edition of Glassi we bring you:



Spotlight on a Member - Michael Gaillard of CENSolutions discuss the key issues affecting his sector and his new role in the GGF

Tech Talk - Giles Willson, provides an overview of the key Technical issues around the UK

GGF Special Events Guide – CE Marking Seminars, the FIT Show, Emergency Glazing Networking Event and Counter Terror Expo in full

Around the Industry – Nathan Bushell, looks at what has been making the news in our industry over the last month

Legal Matters - Citation's employment law survey shows some revealing stats

In the Groups and Regions - Find out what's going on in your region and specialist group

Click below to enjoy full access to your March edition of Glassi

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The Glazine – 12th March

CE Marking advice on offer at FIT

12th March 2013

CENSolutions, the consultancy and test facility for the window, door and glazing industries, is pleased to announce that they will be on hand at the FIT Show to advise visitors on the looming issue of CE Marking.

The company's Joint Managing Director, Wayne Rogerson will be featuring on stand 1-016 to support exhibitor and reinforcement specialist Anglo European and their customers by providing advice and guidance on all things legislation, with particular emphasis on how to comply with the Construction Products Regulation (CPR) in time for the upcoming July deadline for compulsory CE Marking.

Wayne, who will be appearing on the stand alongside another special guest who is yet to be announced, comments: "CENSolutions was established to help companies make sense of their testing, certification, standards and legislative needs, so were delighted when Anglo European asked us to join them on their stand to answer any questions and offer advice to visitors. There is still a great deal of confusion surrounding CE Marking and it is essential that companies wishing to comply are armed with all the facts to





ensure that they are going about it in the right way to prevent making inadvertent false claims after the deadline.”

James Lister, Operations Director at Anglo European adds: “We have known and worked with CENSolutions for many years now and Wayne really is a font of all knowledge. CE Marking is looming and many people are still either scratching their heads about what they need to do to comply, or are put off completely by the thought of additional costs. We care about what we do and we will be advising how visitors who manufacture 500 windows a week could make significant labour savings, so we wanted to bring in an independent third party to offer additional free expert advice on legislative issues.”

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Picture: Wayne Rogerson, Joint Managing Director, CENSolutions will be offering CE Marking advice on the Anglo European stand
