

WINDOW ENERGY RATINGS AND YOUR DECLARATION OF CONFORMITY TO EN 1279 PART 5

Under the rules of The BFRC Window Energy Rating Scheme, registered companies are required to obtain a Declaration of Conformity to EN 1279 Part 5 from their sealed unit manufacturer. This had led to certain parties claiming that the Declaration of Conformity route is avoidance by the scheme body to police a standard which, under the rules of the Construction Products Directive, has been mandatory since March 2007.

However, it is not the responsibility of the BFRC to police this European Standard and for those who understand how EN 1279 works, it is clear that they are asking for this "Declaration of Conformity" in the context of it being a legal statement by the IGU manufacturer, to confirm that they comply with all relevant parts of the EN1279 standard (i.e. Parts 1-6 outlined below). EN 1279 Part 5 also allows for the use of historical data which it is felt may be used to demonstrate compliance whilst longer term Initial Type Testing is being undertaken. Currently, this is especially relevant to EN 1279 Part 3 Gas Leakage testing and also for newly formed manufacturers who need to be able to supply i.g. units from day one. The proviso is that they use a previously tried and tested system which is known to have passed the Initial Type Tests.

In brief outline the six parts of EN 1279 and the manufacturers' responsibilities are:-

Part 1: Generalities, dimensional tolerances and rules for the system description. The system description provides the "exact" make-up of the components and specification of the insulated glass unit(s) placed on the market by the manufacturer.

Part 2: Long term test method and requirements for moisture penetration. Test to be conducted by a Notified Body Test House.

Part 3: Long term test method and requirements for gas leakage rate and for gas concentration tolerances. Test to be conducted by a Notified Body Test House.

Part 4: Methods of test for the physical attributes of edge seals. Test results usually provided by the sealant manufacturers.

Part 5: Evaluation of conformity. This is the main part of the standard with all the other five parts linking to it.

Part 6: Factory Production Control (FPC) and periodic tests. Often referred to as the manufacturers Quality Control System and is defined within EN 1279 Part 6 as: "The permanent control of production exercised by the manufacturer. All the elements, requirements and provisions adopted by the manufacturer are documented in a systematic manner in the form of written policies and procedures. This production control documentation system ensures a common understanding of quality assurance and enables the achievement of the required product characteristics and the effective operation of the production control to be checked". In simple terms, the FPC comprises of:-

- a. Quality manual defining all processes and procedures
- b. All "receiving" and "in-process" testing and inspection records.
- c. Final inspection records.
- d. Training records.
- e. Technical file – including where necessary:-
 - i. A detailed system description as defined in EN 1279 Part 1.
 - ii. Test reports to Parts 2, and Part 3 (if applicable), together with Part 4 test data.
 - iii. Ongoing test results for Periodic and UV Fogging testing from the date of claiming compliance to EN 1279.
 - iv. Quality Contracts with Suppliers to reduce incoming inspection and testing
- f. Calibration records

In the event that a Declaration of Conformity could not be backed up with all the above proof of compliance, then the manufacturer could be liable for prosecution by Trading Standards under the Trade Descriptions Laws.

In addition to these BFRC Requirements, there will also be changes to Building Regulations later this year. So it is clear that the regulatory net is tightening down on those companies which are not currently complying with EN 1279, and so their future as manufacturers will inevitably become more uncertain!

Mike Gaillard, Joint Managing Director of CENSolutions Ltd, hopes that this short clarification to the rules of providing proof of compliance to EN 1279 for the BFRC will be of assistance and feels confident that all manufacturers with further questions will feel free to contact him or their local CENSolutions consultant via the CENSolutions website www.censolutions.com or email info@censolutions.com

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