



STEEL INDUSTRY
GUIDANCE NOTES

CE marking of Steel Products

The Construction Products Directive (CPD) is a European Directive that seeks to remove barriers to trade. The CPD introduces the concept of CE marking for all construction products and steel products such as steel sections, bolts, welding consumables and fabricated steelwork are just coming within its remit. It is therefore essential that those involved in steel construction are aware of the implications of CE marking.

The CPD covers all materials that are permanently incorporated into construction works such as buildings, bridges, highways or other civil engineering projects. Products can only be used if they can be shown to have the necessary characteristics to allow the construction works to meet the six Essential Requirements given in the CPD.

What are the Construction Product Regulations?

The CPD is enforced in the UK through the Construction Products Regulations (CPR). The CPR describes two ways of complying with the regulations. The first is by CE marking and the second is by supplying, when asked, Trading Standards Officers in England, Wales and Scotland and Environmental Officers in Northern Ireland, all the information you have on the product to enable the authorities to satisfy themselves that the product complies with the regulations. Put simply if the product is CE marked there is a presumption that it satisfies the regulations and the CPD, if not CE marked the onus is on the manufacturer or supplier to prove that it does satisfy the regulations.

The two methods of complying with the CPD given in the CPR mean that CE marking is not mandatory in the UK although it is expected to be the most common approach to compliance.

What is CE marking?

A CE marking is a declaration by the manufacturer that his product meets certain public safety requirements. The public safety requirements are a set of Essential Characteristics that each product must satisfy and these characteristics are listed in the product's harmonized standard.

The CE marking itself is a symbol developed by the European Commission so that clients can easily recognize that the product complies with European legislation. In the case of steel products such as sections, bolts and fabricated steelwork the CE marking demonstrates that the product complies with the relevant harmonized standard.



Harmonised standards

For steel structures the main harmonized standards are:

- Steel sections and plate - BS EN 10025-1
- Hollow sections - BS EN 10219-1 and BS EN 10210-1
- Pre-loadable bolts - BS EN 14399-1
- Non-preloadable bolts - BS EN 15048-1
- Fabricated steel - BS EN 1090-1

Most of these standards have either been published or are being finalized by CEN project teams.

Who is responsible for CE marking?

The responsibility rests with the organisation that places the product on the EU market. In most cases this will be the manufacturer but it could also be the manufacturer's representative in the EU or an importer or even a stockholder.

What is clear is that importers and stockholders all have a duty of care to ensure that CE marked products that they are selling have come from manufactures/suppliers that have undergone their necessary attestation and have been properly certified.

An example of responsibility for different steel products is given below

Steel sections - manufacturer/importer/ stockholder

Bolts - manufacturer/supplier

Fabricated steelwork - steelwork contractor

When is all of this happening?

This depends on the product and when the harmonized standard comes in to force.

Open sections to BS EN 10025-1

For open steel sections and plates CE marking came in to force on 1st September 2006. Corus' Advance section range and other accredited steel manufactures products CE mark all their products. The CE mark can usually be found on the Inspection Certificate (Test Cert).

Closed sections to BS EN 10210 and 10219

From 1st February 2008 all closed sections will have to comply with the Construction Products Directive. Ahead of the regulations Corus have been CE marking their products since June 2007. Once again the CE mark can be found on the Inspection Certificate.

Fabricated steelwork to EN 1090-1

The harmonized standard for fabricated steelwork will shortly be issued for formal vote by Member states. CE marking is expected start in early 2008 and will be mandatory in most member states in 2009. BCSA is encouraging all its members to CE mark fabricated steelwork.

What do users need to do?

Users and specifiers need to ensure that their purchasing systems are changed to specify CE marked products from the relevant date (see above).

It should be noted that products that are in the manufacturer's/stockholder's warehouse prior to the CE marking date and are NOT CE marked are considered to be already on the market. Therefore they can be legally sold and used after the CE marking date even in those countries where CE marking is mandatory.

What if I don't use compliant products?

After the relevant CE marking date failure to comply with the CPD will be a criminal offence. If there is an intention or requirement to use products that are not CE marked then the suitability of these products will have to be demonstrated to the relevant authorities.

Key Points

1. The Construction Products Directive introduced the concept of CE marking
2. The CPD is enforced in the UK by the Construction Product Regulations.
3. It is a criminal offence for construction products not to comply with the CPD when the harmonized standard comes in to force.
4. A CE mark is a declaration by the manufacturer that his product meets certain public safety requirements.
5. CE marking is not mandatory in the UK. However all construction products must satisfy the Construction Products Directive.
6. Users and specifiers need to ensure that they specify CE marked products.
7. Products which are put on the market prior to the CE marking date and are NOT CE marked can be legally sold and used after the CE marking date.

Further sources of Information

1. **Guide to the implementation of directives based on the New Approach and the Global Approach, European Commission, 2000.**

This publication can be downloaded from the following web site:

<http://ec.europa.eu/enterprise/newapproach/legislation/guide/index.htm>