

UKCA marking for pedestrian doorsets with fire-resisting and smoke control characteristics

There is still significant confusion among fire door manufacturers regarding UKCA marking, as the situation is not as straightforward as it is for other construction products. Peter Barker explains the current regulatory and legislative landscape.



Fire doors in test conditions

“UKCA marking is currently a continuation of CE marking but for application in Great Britain only; however, after the Building Safety Bill has been enacted we are likely to see a strengthened Construction Products Regulation, with other regulatory requirements called for when placing safety critical construction products on the market.”



All construction products that were previously CE marked under the Construction Products Regulation will need to be UK Conformity Assessed (UKCA) by the 1 January 2023 to be placed on the market in Great Britain.¹

UKCA marking

UKCA marking was introduced as a consequence of the UK leaving the EU and replaces CE marking when placing construction products on the market within Great Britain. The relevant legislation that makes amendments to the regime for construction products in Great Britain is the Construction Products (Amendment etc) (EU Exit) Regulations 2019¹ and 2020¹ which, broadly speaking, is a copy of the Construction Products Regulation that continues to be used within the EU27 (the 27 member countries within the EU).

In Northern Ireland, CE marking will continue to be accepted, as it will across the EU27; alternatively, a CE UKNI mark can be used for construction products that will be sold for use only within Northern Ireland.

At present, only products that are covered by the scope of a designated standard need to be UKCA marked. In future, UKCA marking will also be required for products that conform to a UK Technical Assessment, where one has been issued for the particular product type.

Designated standards

All harmonised standards that gave presumption of conformity with EU law, such as the Construction Products Regulation, became designated standards in the UK on 1 January 2021. The designation process is a formal recognition of the standard by government and does not change the content of the standard. Therefore any product within the scope of a harmonised standard will also be within the scope of a designated standard.

For fire-resisting pedestrian doorsets there are two designated standards (often termed product standards) that are of relevance: *EN 14351-1*² and *EN 16034*.³ >>

Fire-resisting and smoke control doorsets

Reading the scope of the designated standard to see what products are listed and what products are specifically excluded is key to understanding whether a particular door needs to be UKCA marked. Fire-resisting doors are unusual as *EN 14351-1* has to be used with *EN 16034*, so only a fire-resisting door that falls within the scope of both standards is required to be UKCA marked.

Currently, it is only necessary to UKCA mark fire-resisting and smoke control doorsets that separate the internal climate from the external climate of a construction, where the doorset is intended to be used in fire and/or smoke compartmentation and/or escape routes, and when it is supplied complete with all essential parts and from a single manufacturer. It is not currently possible to UKCA mark internal doorsets, as the standard *EN 14351-2*⁴ was not cited in the *Official Journal of the European Union* at the time the UK officially exited the EU, and the standard has not yet been designated by the UK Government.

If the door is not supplied with all components and it is necessary to source components from another manufacturer to complete the construction, it is termed a 'door assembly' and this falls outside the scope of the designated standards and cannot be UKCA marked.

British Standard test evidence

British Standard (BS) test evidence is still listed as a way of demonstrating the performance of fire-resisting doors in the guidance documents used for complying with UK Building Regulations; however, it is necessary to understand the difference between the Building Regulations and the Construction Products Regulation.

Building Regulations

Building Regulations set the requirements for the performance of buildings and construction works, and therefore the performance of construction products. There are different statutory guidance documents used within the UK that provide practical guidance about how to meet the functional requirements of the various parts of the Building Regulations. For example, Approved Document B⁵ provides guidance for meeting the fire safety requirements of the Building Regulations in England and Wales, and Approved Document 7⁶ gives guidance on how to establish the fitness of materials and adequacy of workmanship for building work.

The building design, occupancy and location of a doorset within a building is likely to lead to several different performance requirements covering health and safety, welfare and convenience, access and conservation of fuel and power; this is what shapes the specification of a doorset for a particular location within a building.

Construction Products Regulation

The Construction Products Regulation is a separate regulatory regime that places legal obligations onto manufacturers that are making products available on the market, where the products fall within the scope of the designated standards. In the case of external fire-rated pedestrian doorsets a manufacturer must meet the requirements of the Construction Products Regulation to place the product on the market, as well as satisfy the performance requirements of the Building Regulations. The designated standards call up European Norm (EN) test and classification standards and BS test evidence cannot therefore be used.

Building Safety Bill

CE marking within the EU was intended to remove technical barriers by introducing a common technical language to facilitate the single market; at the moment, UKCA marking follows the same legal framework and requirements. However, the Building Safety Bill⁷ (new primary legislation) that is currently progressing through Parliament will create regulations to make sure that:

- construction products on the market are subject to a general safety requirement;
- existing arrangements for products that perform to a designated standard are retained; and
- new requirements are established for a list of safety critical products.

The purpose of the Building Safety Bill is to:

- enhance market surveillance powers;
- allow for regulation of the accuracy of claims about product performance; and
- provide powers to repeal and redesign the construction products regulatory regime to meet the demands of the UK market.

It is not possible to know precisely what will happen with UKCA marking until the Building Safety Bill has been enacted along with the raft of secondary legislation. However, on reading the proposed Building Safety Bill and the clear intention of enhancing the existing regulatory regime for the UK market, it is reasonable to assume that we are likely to see an increase in specific conformity assessment and market regulatory requirements for safety critical construction products, such as fire-resisting doorsets.

National third-party certification schemes

National certification schemes for construction products (Type 5 product schemes as defined in *ISO 17067*⁸), such as Q-Mark and Certifire, go beyond the requirements given in designated product standards and their associated Assessment and Verification of Constancy of Performance level. For example, the Q-Mark and Certifire schemes for fire-resisting doors include additional labelling and traceability requirements in addition >>

to a centralised listing for certified manufacturers, as well as technical updates to maintain the state of the art regarding product scope or scheme requirements, as necessary.

The Q-Mark and Certifire schemes also incorporate ongoing audit testing, which is a higher requirement than that specified for doorsets covered by *EN 14351-1* and *EN 16034*. Audit testing provides feedback loops on system and product performance. It is particularly important, as materials and processes often change over time, which can lead to an unexpected fall in product performance compared with that demonstrated by the initial type testing.

While national certification schemes can offer increased added assurance in terms of product compliance with the relevant performance standards, they do not negate the need to comply with the Construction Products Regulation and associated designated product standards. National certification schemes can be used in addition to UKCA marking where they offer enhanced safety, but must not conflict with the requirements of the Construction Products Regulation.

Third-party certification continues to demonstrate to the consumer the highest level of added assurance for product compliance. Certification schemes also help to plug gaps in the regulatory system, in terms of assessing conformity.

Conclusion

It is entirely possible that a project involving fire and/or smoke doorsets that are both internal and external will have to meet the same national Building Regulation requirements in terms of the level of fire resistance and smoke leakage performance, but with the fire-rated external doorsets also requiring UKCA marking before they can be placed on the market and installed within the building.

UKCA marking is currently a continuation of CE marking but for application in Great Britain only; however, after the Building Safety Bill has been enacted we are likely to see a strengthened Construction Products Regulation, with other regulatory requirements called for when placing safety critical construction products on the market. For further information and guidance on the construction products regulatory framework, it is worth referring to the factsheet⁹ that has been produced by the Department for Levelling Up, Housing & Communities (DLUHC).

Given the announcement by Ministry of Housing Community and Local Government (MHCLG) in August 2021 extending the deadline for acceptance of CE marking within the GB market to the end of 2022, there is a little more breathing space within the industry to understand UKCA marking and comply with the Construction Products Regulation – but time is running out. ■

About the author



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Further information

To find out more about Warringtonfire's certification schemes, visit www.warringtonfire.com

Further reading

- *Technical Bulletin: UKCA marking*, BM TRADA, 2022 (www.bmtrada.com/certification-services/third-party-certification-non-fire/ukca-marking-for-construction-products)
- *WIS 1-13 Performance of fire-resisting timber-based doorsets*, BM TRADA, 2018
- *WIS 1-32 Upgrading timber joinery doors for fire resistance*, BM TRADA, 2020
- *WIS 1-47 Timber external doors*, BM TRADA, 2019

References

Note: The BSI numbering policy is to adopt the European Committee for Standardisation (CEN) numbering, prefaced with BS when the standard is published for use in the UK

1. www.gov.uk/guidance/construction-products-regulation-in-great-britain
2. *EN 14351-1:2006+A2:2016 Windows and doors – Product standard performance characteristics – Windows and external pedestrian doorsets*, BSI
3. *EN 16034:2014 Pedestrian doorsets, industrial, commercial, garage doors and openable windows – Product standard, performance characteristics – Fire resisting and/or smoke control characteristics*, BSI
4. *EN 14351-2:2018 Windows and doors – Product standard, performance characteristics – Internal pedestrian doorsets*, BSI
5. Approved Document B, Volume 2, 2019 Edition: www.gov.uk/government/publications/fire-safety-approved-document-b
6. Approved Document 7, 2013 edition incorporating 2018 amendments – for use in England: www.gov.uk/government/publications/material-and-workmanship-approved-document-7
7. <https://publications.parliament.uk/pa/bills/cbill/58-02/0139/en/210139en.pdf>
8. *BS EN ISO/IEC 17067:2013 Conformity assessment – Fundamentals of product certification and guidelines for product certification schemes*, BSI
9. www.gov.uk/government/publications/building-safety-bill-factsheets/construction-products-regulatory-framework-factsheet