

# PRODUCT SUBSTITUTION

BSI presentation at Members Week 2020

GGF Members Week 2020

Mark Barsby  
Technical Development Manager

30 September 2020

Copyright © 2020 BSI. All rights reserved



**bsi.**



Glass and Glazing Federation

# Product Substitution

and its effect on Kitemark<sup>TM</sup>  
and other 3<sup>rd</sup> Party Certification



Produced in collaboration with **bsi.**

# Product Substitution

& its affects on product certification

What is product substitution?

- A product that can be used in place of a similar product
  - Eg:-If an item is out of stock



- A cheaper product has been used instead of a more expensive one in order to reduce costs



Is this ok or not ok?

# Product Substitution

& it's affects on product certification

What is product substitution?

- Choice and competition is a good thing
- Brand loyalty
- Quality
- Leads to fair pricing
- Value – get what you pay for





# Product Substitution

& its affects on product certification

What is product substitution?

- What if the product is to a different specification?
- Has not undergone the same tests
- Claims to be the original product (counterfeit)
- Compromises performance
- Creates legacy issues affecting warranties and guarantees



# Product Substitution

& its affects on product certification

## Why is it such an issue?



### Building a Safer Future

Independent Review of Building  
Regulations and Fire Safety:  
**Final Report**

May 2018

Dame Judith Hackitt DBE FREng

Cm 9607

# Product Substitution

& its affects on product certification

## **Building a Safer Future**

Independent Review of Building Regulations and Fire Safety

# 53

Report  
Recommendations

Chapter 7  
Products

# Product Substitution

& its affects on product certification

## Building a Safer Future

Independent Review of Building Regulations and Fire Safety

**7.16** Part 4 of this chapter recommends market surveillance of construction products at a national level. The proposed market surveillance body would drive the introduction of risk-based testing, to ensure that inappropriate **product substitution** or evolution, as well as any element of gaming the system, is tackled.....



# Product Substitution

& its affects on product certification

## **Building a Safer Future** - Independent Review of Building Regulations and Fire Safety

7.1 Assessments in lieu of tests (also known as 'desktop studies') should only be used in a very limited number of cases. Where they are used, they must be carried out by people who are qualified or competent, and must be properly documented.

7.2.....it is apparent that the current system makes it difficult to know whether the right products are being used.

7.4 ....significant further work is needed in order to create a comprehensive regime that ensures that all products used in construction are properly tested, certified, labelled and marketed.

7.5 Part 1 of this chapter sets out recommendations to establish a more transparent testing regime, with appropriate retesting, to ensure greater robustness in the testing system.

Source:

**bsi.** [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/707785/Building a Safer Future - web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/707785/Building_a_Safer_Future_-_web.pdf)

# Product Substitution

& its affects on product certification

Why is it such an issue?

- Industry response by Construction Products Association (CPA) Marketing Integrity Group (MIG)
- Ensure construction product information is provided in a clear and unambiguous way
- Call for evidence attracted 524 responses
- Executive summary- Most respondents are aware of substitution occurring within the last 12 months. In more than half of the projects involving substitution, the substitution was not discussed and agreed among the project team, and the performance criteria of the replacement product were not compared to the original to ensure that they were equivalent.
- Users have mixed experiences of product substitution: in some cases negative, in others positive.

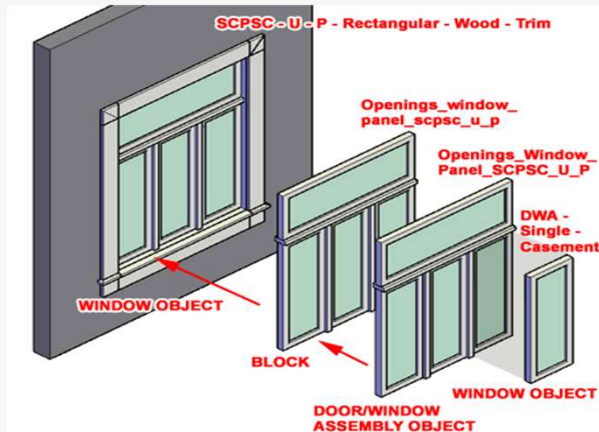
A close-up photograph of a window frame hinge mechanism. The hinge is a long, silver-colored metal strip with several adjustment screws and a central pivot point. It is mounted on a white plastic window frame. The background is slightly blurred, showing more of the window frame and a wooden surface.

# Product Substitution & its affects on product certification

## How Does this affect me?

# Product Substitution

& it's affects on product certification



# Product Substitution

& its affects on product certification





& it's affects on product certification

# TRUST





# Product Substitution

& its effects on product certification

## **EN 14351-1:2006+A2:2016**

Windows and doors - Product standard, performance characteristics Part 1: Windows and external pedestrian doorsets

**Annex A: Interdependence between characteristics and components**

## **BS 7412:2007**

Specification for windows and doorsets made from unplasticized polyvinyl chloride (PVC-U) extruded hollow profiles

**Annex A: Guidance on the evaluation of conformity**

(Also Annex A of **BS 4873** aluminium & **BS 644** Timber)

## **BS EN 1279-1:2018**

Generalities, system description, rules for substitution, tolerances and visual quality

**Annex D: Rules to substitute materials and components, possible changes within components and addition in the system description**

# Product Substitution

& it's affects on product certification

The cost of getting it wrong



## 'Plague' of plastic windows blighting conservation areas

Conservation areas across England are being blighted by a "plague" of plastic windows, according to English Heritage.



# Product Substitution

& it's affects on product certification

Before changing, modifying or substituting components or products,  
be **SAFE**

- **S**crutinize legislation and the law
- **A**nalyze the risk to safety
- **F**actor-in the affect on guarantees and warranties
- **E**valuate the continuing validity of 3<sup>rd</sup> party certification

# PRODUCT SUBSTITUTION & IT'S AFFECTS ON PRODUCT CERTIFICATION

## THANK YOU FOR LISTENING

30 SEPTEMBER 2020

Copyright © 2020 BSI. All rights reserved



**bsi.**