



Heat Soaked Thermally Toughened Glass Annex C: Example Inspection Report

Inspection Report

| | | | |
|---------------------------|---------------------|--|------------------|
| Premises Inspected | [Name] [Address] | | |
| Date of Inspection | [Date] | Entry Exit | [Time] [Time] |
| Authorised Officer | [Name] | Accompanied by | [Name] [Name] |
| Persons spoken to | [Name] | Notice of Powers & Rights Issued to | [Name] |

| | |
|------------------------------|--|
| Purpose of Inspection | <ul style="list-style-type: none"> Market Surveillance inspection of manufacturer of HSTTG to ascertain compliance with Regulation (EU) No 305/2011 on Construction Products. |
| Areas Reviewed | <ul style="list-style-type: none"> Review of technical documentation relating to HSTTG, including Declaration of Performance (DoP), Certificate of Constancy of Performance (CoCoP) where required, FPC records, third party testing and certification. Inspection of manufacturing sites and connected processes and procedures. Sample work order through production and associated records. |

| Powers Exercised During Inspection | | | |
|---|------------------------------------|----------|---------------------------------------|
| X | Entered Premises | | Entered Under Court Warrant |
| X | Inspected Products | X | Examined Procedures |
| X | Required Documentation | X | Required Explanation of Documentation |
| | Test Purchased Products | | Seized and Detained Goods / Documents |
| | Broke Open a Container | X | Taken Copies of Documents |
| X | Required Assistance or Information | | Other |

Documentation copied:

[List here]

Matters Requiring Attention

This inspection report is not intended to be a comprehensive list of all the product safety issues relevant to your business but is a record of those identified and discussed during my visit.

During the inspection, we identified several breaches of the requirements of Regulation (EU) 305/2011, primarily relating to Declarations of Performance, initial type test reports, conformity marking and labelling, factory production control, test equipment, and quality documentation. These issues are set out in more detail below:

Declaration of Performance (DoP)

On the day of the inspection, DoPs were provided for thermally toughened glass products, but none were available for HSTTG products as required by the Regulations. No DoPs were produced for Sandblast, Cotswold or Satin glass, all three construction products can be subject to toughening and heat soaking process.

The DoPs reviewed were not in accordance with the Regulations as summarised below:

- Both DoPs had the same reference number 'xxxxx'. Every DoP must have a unique identification reference.
- Place of issue and date of issue were missing.
- The description of the essential characteristics was not as required by BS EN 14179-2:2005 Table ZA.1.
- The Resistance against sudden temperature changes and temperature differentials K value for float glass is given as 40 K (taken from the float glass DoP), however according to both EN14179-1 and EN12150-1 this can be replaced with 200 K, see page 30 and 26 respectively in these standards.
- There was no specific section on the DoP for intended use.
- The date and version of the test standard was missing.
- The declaration as per Annex III of the Regulations was missing.
- The Approved Body number was missing for products requiring an AVCP system 3 or higher.
- AVCP system number was missing or wrong.
- The declaration for the conformity assessment should state "*The performance of the product identified above is in conformity with the set of declared performance/s. This declaration of performance is issued, in accordance with Regulation (EU) No 305/2011, under the sole responsibility of the manufacturer*", for CE marked products.

- OR the declaration should state “*The performance of the product identified above is in conformity with the set of declared performance/s. This declaration of performance is issued, in accordance with Regulation (EU) No 305/2011, as it has effect in the United Kingdom in respect of Great Britain,*” for goods manufactured under UKCA.
- OR the declaration should state “*The performance of the product identified above is in conformity with the set of declared performance/s. This declaration of performance is issued, in accordance with Regulation (EU) No 305/2011, as it has effect in the United Kingdom in respect of Northern Ireland*” for goods manufactured in Northern Ireland under the CE UKNI scheme.

There was no evidence that the DoPs were made available to customers.

We recommend following the model given in Annex III of the Regulations which can be found here: [Annex III](#).

It is critical that you revise your DoPs for all the regulated construction products that you place on the market without delay to ensure that you comply with the requirements of the 2011 Regulation and the relevant Designated Standards, addressing all the key points required. You have a legal obligation to ensure that all DoPs are compliant, kept up to date and are made available to your customers. You may wish to provide links to your DoPs on your website for your customers to access.

The release of dangerous substances is a consideration for glass that is coated, for example with enamel paint. The safety data sheets provided by the manufacturer of the paint should accompany the commercial documentation of the construction products or be provided on your website.

Initial Type Test Reports

The suitability of the initial type test reports could not be established on the day of the inspection because of the age of the reports and the inability to clearly identify exactly what was tested and how it relates to current production.

The ITT report did not cover hard coat toughened glass. If you do not supply hard coat toughened glass then please advise accordingly.

Conformity Marking and Labelling

At present, you do not conformity mark/label the product itself. Article 9 of the Regulation (EU) 305/2011 requires marking to be indelibly fixed to the product where it is warranted and possible. See Annex ZA.3 of BS EN 14179-2:2005. The conformity marking shall be shown on the heat soaked thermally toughened soda lime silicate safety glass, or when not possible, it may be on the accompanying label or accompanying commercial documents.

Clause 6.2 of BS EN 14179-2 references clause 12 of BS EN 14179-1 which specifies that HSTTG must be labelled with the name or identifying trademark of manufacturer and BS EN 14179-1.

The label that you attach to your finished product does not fulfil the requirements of Annex ZA.3 of BS EN 14179-2:2005. This information may be given with other commercial documentation accompanying the product, however we have not seen evidence of this.

The label is missing the following information:

- The last two digits of the year in which the CE/UKCA marking was affixed
- Reference to the applicable Designated Standard
- Intended use of the glass
- Information on the essential characteristics

OPSS will accept that where customers are provided with individual DoPs or the DoP unique reference is captured on commercial documentation then it is not necessary to duplicate the same information on the product label if the DoP is displayed on your website. Please note it is essential to ensure that DoP historical records are maintained for 10 years from the date of the DoP, even when DoPs are replaced due to changes in the product.

Factory Production Controls

Thickness and dimension measurements are being carried out prior to thermal toughening, but there were no factory production control (FPC) records available to support (BS EN 14179-2 Table A.1, 2.1.2 (thickness) and 2.1.3 – (dimensions, shapes, holes, notches, etc.)).

There was no traceability for the source glass recorded.

FPC records for fragmentation, bow and bending were recorded in a single book located on the factory floor. The records in this book were not copied or backed up meaning that all FPC records for these tests would be lost if the book were to get damaged or mislaid.

There was only limited evidence that heat soaking was being carried out as heat soak temperature plots were only stored at the customer's request. In addition, there was no evidence of fragmentation testing being carried out after heat soaking and no supporting FPC records were available.

A calibration certificate for the heat soak oven was provided; it was noted that the serial numbers of the heat soak oven and control unit were not recorded on the calibration certificate. There was no reference or picture of the spacers used for the calibration to demonstrate that they meet requirements in BS EN 14179. When the oven is recalibrated, the BS EN 14179-1:2005 test method should be followed.

The standard operating procedure focused on the safe working practices but not on how to load and unload the oven, how to set the oven, what information should be recorded and on what documentation, and what testing is required after the heat soaking process.

No records kept of non-conformity situations requiring corrective action and subsequent action taken.

No ability to obtain heat soak oven temperatures when in use.

Test Equipment

Tape measures in use on the factory floor were not uniquely identified.

The square used for the fragmentation test was not calibrated.

Overall bow, local bow check was only carried out using a spirit level. This test should be carried out using calibrated equipment and the measurement recorded.

It was noted that the calibration of the heat soak oven was overdue. This indicates that test equipment is not adequately controlled.

Quality System

Several issues were identified with the quality manual and quality documentation; these are summarised below:

- The quality manual was inadequate in places e.g. roles and responsibilities were not clearly defined; the quality function was not referenced on the organisation chart; not all required representatives were present at the management review meeting; there was only one documented management review meeting; there were no completed versions of the FPC documents in the quality manual found in use on the factory floor.
- The quality manual did not reflect the production processes taking place on the factory floor.
- The documents used in the factory were not controlled documents nor were they referenced anywhere in the quality system.
- The organisational structure, responsibilities and authorities of the management regarding product conformity was not adequately described in the quality manual.
- The inspections that will be carried out before production, the inspections and tests during and after production, and the frequency at which they will be carried out were not adequately defined in the quality manual.
- The test machine used for fragmentation, bow, and mechanical strength, and heat soak oven were not referenced in the quality manual 'maintenance register'.
- Training records were not available for competent users of the heat soak oven.
- The quality manual needs to be updated to reflect the new method for recording non-conformities.
- The quality manual did not adequately define technical documentation in relation to document retention, e.g. DoPs.

Next Steps

Please contact this office within the next 28 days providing:

- Revised Declarations of Performance for all toughened glass products, Declarations of Performance for all HSTTG products, and evidence of how these are being made available to customers.
- Initial type test reports for pendulum body impact that adequately cover current production.
- Evidence to demonstrate that the deficiencies identified with the quality system and quality manual have been adequately addressed.
- Evidence that finished glass is being supplied with a label/accompanying documentation that meets the requirements of the standard/s.
- Example FPC records for thickness and dimension measurements.

- Evidence that all test equipment is adequately identified and controlled.
- Evidence to demonstrate that critical FPC records are suitably backed up and retained (in relation to the single book found in use on the factory floor).
- Evidence that fragmentation testing is routinely being carried out after heat soaking, specifically:
 - A new or updated test procedure,
 - Example FPC records for fragmentation testing after heat soaking.
- Evidence that heat soak temperature plots are retained and adequately backed up for all heat soak loads.
- Training records for **[Name]** evidencing how they are competent in heat soaking

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