



Stanislav Kraupner
director of the company

Březinova 475/3
186 00 Praha 8

Your letter/dated:

Our mark:

VUPS/1015/13

Solved by:

Branislav Maňo

In Prague on:

September 11, 2013

Subject: Expert opinion

Dear company.

On the basis of your query to the legitimacy of the requirement for the Declaration of Properties and CE marking for your product „KRAUPNER Bird Control Spike System“, we would like to

inform

you about our expert opinion to this case: According to the REGULATION (EU) No 305/2011 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 9 March 2011 laying down harmonised conditions for the marketing of construction products and repealing Council Directive 89/106/EEC, the manufacturer - Stanislav Kraupner - is not obliged to submit and issue the Declaration of Properties (DoP) and subsequently mark the products by the CE marking, because no european harmonised standard has been issued for the relevant product until present time.

As well as manufacturer is not obliged to issue the Declaration of Conformity within the meaning of Government Order No. 163/2002 Coll., that lays down technical requirements for selected construction products, as amended by Government Order No. 312/2005 Coll., because according to article 1 (1) a) the product characteristics can not affect at least one of the essential requirements for construction works specified in Annex No. 1 to this Order, where incorporation in a permanent manner of a product in a construction work means such incorporation where the removal or replacement of the product changes the characteristics of the construction work in a permanent manner, and the removal or replacement of the product is construction work.

Best regards

Výzkumný ústav pozemních staveb
Certifikační společnost, s.r.o.
102 21 Praha 10, Hostivař, Pražská 10 / 610
IČ 250 520 63 (f)

Ing. Lubomír Keim, CSc.
director of the company