CPR – FAQ Update 2016-07-26

DISCLAIMER

This FAQ document is a collection of questions that have been posed to ICEL and of the relative answers that reflect ICEL's best knowledge/understanding at the time of writing (July 2016). It is not a legally binding document and is not intended as a substitute of the assessment/understanding made by standardisation bodies, by legislation or stakeholder. It is a private non-binding information document. We would like to remained that the binding interpretation of Community legislation remains the exclusive competence of the European Court of Justice.

Due to the great amount of work that is on going the subject, ICEL will take care to up date the document according to the developments that will take place at standardisation or legal levels.

1) **What is the purpose of the Constrution Pruduct Reguation (CPR)?**

   It is a European Regulation that adopts harmonised standards to ensure reliable information on construction products that are going to be permanently installed in buildings in relation to their performances.

   The harmonised standards take into account and give all the safety parameters in respect of the construction product.

   This standard framework will be applied by:

   - *manufacturers when declaring the performance of their products,*
   - *authorities of Member States when specifying requirements for them,*
   - *users (architects, engineers, constructors…) when choosing the products most suitable for their intended use in construction works.*

2) **Which products are included under the CPR?**

   All the products that will be permanently installed in a construction work meaning building and civil engineering works and for which the Member State has set down safety installation rules that must be respected for the constructions.

3) **Are electrical cables included under the CPR?**

   Yes, electrical cables for permanent installation in constructions (power, communication, data, and optical cables) are recalled by the CPR (annex IV table 1 of the regulation) and different levels of performance, with the objective of limiting the generation and spread of fire and smoke, are set down.

   The EU Commission has considered that the cable reaction to fire is an important safety requirement for construtions. Not been regulated by the LVD directive, that up to know is the directive to be followed to place a cable on the market, has included electric cables as construction products but only with regards to their performance in respect of fire propagation and fire resistance.

4) **Which will be the implications for cables for their inclusion in the CPR?**

Under the CPR to place an electric cable on the market there must be product harmonised standard that specifies the performance that the product must meet. The manufacturer will draw up the Declaration of Performance (DoP) following the procedure of this standard. The DoP will give regulatory guidelines on the product identification, its intended use and for cables on the bases of the fire test performance it's intend use (as reported in annex III of the regulation).

The DoP must follow the cable put on the market up to the user (art. 7 of the CPR) that on the basis of the information contained in the DoP, will decide to purchase it, as fit for the intended use of such product and he assumes the full responsibility of such decision.

5) **What is a Declaration of Performance (DoP)?**

The DoP is a document drawn up by the manufacturer, for each electric cable, following regulatory guidelines set down in the Regulation (annex III) which will:

- identifies the product

- its intended use

- its essential characteristics as given by its declared performance (for cables by classes of performance for reaction to fire).

With this declaration the manufacture assumes the responsibility for the conformity of the construction product with the declared performance. According to the information contained in the DoP, the user will decide if he will purchase the cable, that is fit for the intended use of such product and he assumes the full responsibility of such decision.

The manufacture, to draw up the DoP, needs that a Notified Body to define and grant the levels of performance of the cables.

6) **Which are the cables performance that must be satisfied so to mark them CE under the CPD?**

As the electrical safety performance are covered by the LVD directive, that does not take into account the fire reaction of cables in case of fire, the Commission has decided to include electrical cables as a construction product under the CPR so to comply with the following performances:

- *reaction to fire*
- *resistance to fire*
- *release of dangerous substances in normal operation, dismantling and recycling.*

From 1st July 2017 an electrical cable, for which the intended use is to be installed permanently in construction, will be CE marked for the LVD directive and for the CPR regulation.

7) **Which are the reaction to fire performances foreseen for cables in the CPR?**
According to the Commision Decision 2006/751/EC there are sets out 7 different classes of performance called "Classes of reaction-to-fire performance for electric cables" (Aca, B1ca, B2ca, Cca, Dca, Eca and Fca) and the classification criteria is made by measurements of flame spread and heat release. For each class there are also other three additional classification performances: smoke production, flaming droplets and acidity. Additional classification means that each Member State can decide if to use or not these elements in the classification of cables.
As it can be easily understood for each cable there can be many combinations of classes of reaction to fire and additional classification performances (class reaction + smoke + droplets + acidity) so that the user may find a lot of variations of a cable having the same electrical performances, making difficult the cable choice.

8) **How can this high amount of varieties of cables be cut down so to simplify the cable choice suitable for the use?**
This can be done by the National Authorities if and when specifying the CPR requirements for the construction or by the national standardisation body by fixing only a limited number of classes and additional requirements that are fit for their safety needs.

9) **The electric cable performance classes chosen by one Member State will be the same as in all the other States of the EU?**
Each Member State, under the principle of subsidiarity, will decide how these classes are to be used in its construction standards and/or regulations for the different type of construction. This means that what is set in on e Member State may or not be different from what required in another Member State.
In each Member State there will be a "contact point" where can you obtain information on requirements for a particular product. The updated list of established contact points can be found in: http://ec.europa.eu/DocsRoom/documents/10006/attachments/1/translations/en/renditions/native

10) **Starting for which date the application of the CE mark under the CPR will become mandatory?**
The applicability of the CE on cables under the CPR, for the performance reaction to fire, has become effective from the 10th June 2016 with the Commission communication reported on the OJEU n° C 209/03. With this communication the product harmonised standard EN 50575 has been adopted by the Commission and starting from 10/06/2016 has been set a coexistence period ending 1st July 2017.
After the date of the 01/07/2017 it will become mandatory for all cables, that will be permanently installed in a construction work, to marked CE under the CPR before making them available for the market.

11) When will the CPR be applicable to fire resistant cables?

The cable test standards (EN 50200 for PH classification and EN 50577 for P classification) have just been published. At present the product standard for these cables is missing and only after that it has been published and adopted by Commission by publishing it on the OJEU, the CE under the CPR for fire resistant cables will become applicable.

It is difficult to say when the fire resistant cables will fall under the CPR, as no draft product standard has wet been circulated in CENELEC. We can think that it may be possible to have this standard ready for mid/end 2017 after which it must be adopted by the EU Commission. It is foreseeable that there will be a period of coexistence of 1 year so we can predict that the obligation for the CE marking of fire resistant cables will be within the end of 2018.

In the mean time the present fire resistant cables can be supplied to the market with no reference to the CPR.

12) Until when it will be possible to install cables not marked CE under the CPR?

The rules for making available cables on the market are set down by the CPR but it does not report obligations on the installation of cables. It is within the competence of the Member State Authority to set down these obligations and for cable fire performance they must refer to the CPR classification.

13) The cables present today on the market will satisfy the CPR requirements?

It depends on how the Member State will regulate the cables installation in the country. It is likely that cables going to match the performances of the Classes B2ca, Cca and Dca will require reassessment and potential adjustment.

14) When will the first cables marked CE under the CPR be available for the market?

It is probable that the timing of applying the CE mark under the CPR will be different in each Member State as it depends if a national regulation exists and regulates the matter, on the development timing of local product and installation standards that will take into account the CPR.

15) Where can I find more information on the CPR?

All National Cables Association have in their web site information on the CPR with regards to cables.

And on the EU web site:

http://ec.europa.eu/growth/sectors/construction/product-regulation_en