

## Europacable WHITE PAPER ON CPR MARKING OF CABLES

### DISCLAIMER

This paper reflects the best knowledge of industry experts across Europe at the time of writing (September 2018). It represents our best understanding of the CPR<sup>1</sup>. It is not a legally binding document and is not intended as a substitute for each stakeholder's own assessment and decision making. A binding interpretation of European Union legislation remains the exclusive competence of the European Court of Justice. Europacable declines any and all liability for any measure taken or not taken on the basis of this document, which is a private non-binding information document to be possibly used and accommodated by National Associations to prepare their own national documents.

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### Background

The Construction Products Regulation (also known as CPR) came into force on 24<sup>th</sup> of April 2011 replacing the previously existing Directive CPD. For cables, the CPR came into force on the 1st of July 2017 after a transition period of one year.

The CPR provides a new mandatory language to express the fire performance of construction products. Generally speaking, all cables used in any type of building and civil works are subject to the CPR, unless they are specifically designed for temporary installations. Control and power circuits inside machinery, or elevators, are not subject to the CPR.

The CPR only specifies the reaction-to-fire<sup>2</sup> and the release of dangerous substances performances of cables at the moment of placing on the market. All other characteristics remain unaffected.

### The regulation

To make the CPR active for cables, CENELEC (the European Standardization Body for Electric Materials) issued some standards. The most important one, which defines the procedures to CE mark the cables, is the standard EN50575:2014 + A1:2016.

### Obligations of Manufacturers

The CPR imposes several obligations on manufacturers:

- To ensure that procedures are in place to ensure that series production maintains the declared performance
- To make their product identifiable<sup>3</sup>

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<sup>1</sup> Construction Products Regulation No 305/2011 of 9 March 2011.

<sup>2</sup> Cables are tested and classified according to their performance level. They are ranked in Euroclasses ranging from A<sub>ca</sub> to F<sub>ca</sub>, with F<sub>ca</sub> being the lowest performance. Other additional parameters are smoke opacity, flaming droplets and acidity of emissions.

The four parameters can be combined into more than 180 combinations. Each combination stands for a unique CPR classification code. This allows authorities in various countries to impose specific classifications for buildings and civil works.

<sup>3</sup> Art.11.4 and 11.5 set rules about elements allowing product and manufacturer identification. Elements shall be marked on the product itself, or, where the size or nature of the product does not allow it, on the packaging or in a document

- To draw up and make available the Declaration of Performance<sup>4</sup>
- To CE mark their product under the CPR<sup>5</sup>

## Obligation of installers and specifiers

There are no specific obligations for installers and specifiers under the CPR, this Regulation is dealing with the free circulation of goods rather than with safety and installation.

The CPR is not changing the existing obligations of installers and specifiers regarding safety and conformity of the circuits in local installation Regulations/Standards. Specifiers should adopt the new technical language to select and specify the fire performance of cables. Installers should add the DoPs of cables to the usual reporting.

In case of doubts, professionals and consumers can confirm the authenticity of the CE-marking by:

- asking their national Contact Point for Construction
- asking the Notified Body which is stated in the Declaration of Performance and on the label.

The list of national Product Contact Points for Construction<sup>6</sup> and of all Notified Bodies<sup>7</sup> is available on the EU website.

## Affixing the CE marking

In view of the **specific nature of the product cable**<sup>8</sup> the fulfilment of the obligation to affix the CE marking set by the CPR is possible exclusively through labels or accompanying documents.

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accompanying the construction product. Specific rules for cables are clearly defined at Art.7 of the mandate Standard EN50575:2014 mentioned above.

<sup>4</sup> It is the obligation of the manufacturer before affixing the CE mark on the product to prepare and distribute the Declaration of Performance and a technical documentation in a language easily understandable by the user. In accordance with Delegated Act 157/2014 on the conditions for making a Declaration of Performance on construction products available on a website, the manufacturer shall be sure that the document is maintained unaltered for ten years and that instructions have been provided to the recipients of construction products on how to access the website and the declarations of performance.

<sup>5</sup> The obligation of the manufacturer in terms of CE marking of construction products are set as follows: Art.11.1 of the CPR defines that the CE mark shall be affixed by the manufacturer in accordance with Art.9 either on the product or on the packaging or on any accompanying document. Art.11.3 sets the condition that the CE marking shall be affixed before the construction product is **placed on the market**. Art.2.17 says: 'placing on the market' means the first making available of a construction product on the Union market. Not to be confused with Art.2.16 definition of 'making available on the market' which means any supply of a construction product for distribution or use on the Union market during a commercial activity, whether in return for payment or free of charge. In practical terms the obligation to affix the CE marking is limited to the first shipment of the product from the manufacturer to any other economic operator.

<sup>6</sup> <https://ec.europa.eu/docsroom/documents/28622>

<sup>7</sup> NANDO - please select Product Family: Power, control and communication cables)  
[http://ec.europa.eu/growth/tools-databases/nando/index.cfm?fuseaction=directive.notifiedbody&dir\\_id=33](http://ec.europa.eu/growth/tools-databases/nando/index.cfm?fuseaction=directive.notifiedbody&dir_id=33)

<sup>8</sup> The specific nature of cables makes it impossible to adopt the same criteria of marking for cables of completely different size and material, to fit a huge list of information in the normal reasonable length of repetition of information on the cables.

Therefore, the Annex ZZ of the mandate Standard EN50575:2014 regulates **the CE marking** (and all regulatory additional information<sup>9</sup>) **to be affixed visibly, legibly and indelibly to the product labels, affixed to the reels, coils or drums** of power, control and communication cables. Cables forwarded in the original packaging already hold the proper CE marking.

The CE mark has to be forwarded until the cable is installed. The CE marking of cables cut-in-length (after their first placement on the market) is beneficial for the entire supply-chain as it makes it easier to identify and/or distinguish between fully compliant and uncertain-sourced cables.

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<sup>9</sup> Article 9 of the CPR defines that the CE mark shall be followed by:

- the two last digits of the year in which it was first affixed,
- the name and the registered address of the manufacturer, or the identifying mark allowing identification of the name and address of the manufacturer easily and without any ambiguity,
- the unique identification code of the product-type,
- the reference number of the declaration of performance,
- the level or class of the performance declared,
- the reference to the harmonised technical specification applied,
- the identification number of the notified body, if applicable, and
- the intended use as laid down in the harmonised technical specification applied.