

FAQ on CPR

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A. SCOPE

Q01: What is the purpose of the CPR?

The Construction Products Regulation (CPR) is intended to ensure reliable information on construction products in relation to their performances. This is achieved by providing a “common technical language” offering uniform assessment methods of the performance of construction products.

These methods are compiled in harmonised technical specifications. This common technical language is to be applied by:

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

Further information can be found at: http://ec.europa.eu/growth/sectors/construction/product-regulation/index_en.htm

Q02: What performances of cables are included under the CPR?

The only performances of cables included under the CPR are

- reaction to fire
- resistance to fire
- release of dangerous substances in normal operation¹, dismantling and recycling.

Q03: Which cables are included under the CPR?

Cables for permanent installation in constructions within the scope of the two harmonised product standards i.e.:

- cables intended to be used for the supply of electricity and communications in buildings and other civil engineering works and subject to performance requirements on reaction to fire
- and **in future** cables intended to be used for the supply of electricity, communication and fire
- detection and alarm in buildings and other civil engineering works where it is essential to assure the continuity of power and/or signal supply of safety installations.

Cables for permanent installation are considered those which are not specifically designed for temporary installation only. Are not considered lift cables that are not part of the Mandate M/334 EU²

Q04: Do cables in prefilled conduits and pre-connected systems have to be CE marked?

CMS and pre-connected systems are not under CPR, but it is important that any cables within pre-assembled wiring should comply:

- if the prefilled conduits' and pre-connected system final application is in construction and civil engineering works subject to reaction to fire requirements, or
- if they are sold through the distribution channel and their final application can be construction and civil engineering works subject to reaction to fire requirements.

¹ not including performances during fire

² Lift cables are not considered because they are not part of **Mandate M/443 EN to CEN and CENELEC related to power, control and communication cables** – Footnote 2) of Annex 1 – FIELD OF APPLICATION.

In these cases the cables inside the prefilled/ prewired conduits and pre-connected systems have necessary to be certified under the CPR and the final product must bear the CE marking which refers to the reaction to fire performance of the cables. The prefilled conduits and pre-connected systems are indeed just a combination of two products (conduit-cable and connector-cable) meant to facilitate and speed up the installation of cables mostly within buildings. Moreover and as the normal cables, the prefilled conduits and pre-connected systems can be installed inside constructions if the minimum CPR Euroclass (including eventual smoke, droplets, and acidity classification) of the cables they contain is in line with the Euroclass requirement for that application in that country.

Q05: Is CE marking mandatory for an outdoor cable entering a building?

All cables installed permanently in constructions must be CE marked. National Regulators can define for special circumstances the maximum length of cable whose contribution to fire is considered negligible and therefore accepted without any CE marking or with a level of performance lower of what required for the specific construction. In such a case the cable must be as short as possible and connected in the fire compartment it enters. For IT (Information Technology) installations refer also to 50174-2³.

Q06: Which is the max rated voltage that is considered for general applications and therefore in the scope of EN50575:2014+A1:2016?

The CPR does not make distinctions based on rated voltage and therefore all cables installed permanently in constructions are subject to the Regulation. However, special applications are excluded from the scope of EN 50575. Therefore, in some countries, National Regulators may define a maximum rated voltage, above which an application is considered as a Special Application, not falling in the scope of EN 50575:2014+A1:2016.

Q07: Do fire resistant cables fall under the CPR? And, in case, is it possible to CE mark them?

FR cables definitely fall under the CPR. CPR covers both reaction to fire and resistance to fire, but so far only the harmonized standard EN 50575 for reaction to fire is available. Therefore fire resistant cables cannot be certified under the CPR until the dedicated harmonized standard will be issued and published on the OJ of the EU. It is therefore so far forbidden to CE mark and issue a DoP for fire resistant cables.

Q08: How to fulfil the request of customers/national authorities to declare/certify the performance of reaction-to-fire according to EN50575 for of cables which are not specifically covered by the intended use included in the standard EN50575?

³ EN50174-2 – Information technology installation. Installation planning and practices inside buildings.

4.1.8.2 External cables containing flammable materials

Information technology cables that do not comply with the minimum recommended performance requirements of EN 60332-1-2 shall be either:

a) terminated in an entrance facility which is outside the external fire barrier of the building;

or

b) terminated inside the building, within 2 m (unless an alternative distance is specified by local regulations) of the point of internal penetration of the external fire barrier or any length exceeding 2 m is installed within trunking or conduit that is considered as a fire barrier in accordance with local fire regulations.”

NOTE This also applies where the cable has to pass through a space between two external fire barriers within a building

Only cables which original intended use is general applications in constructions and civil engineering works subject to reaction to fire requirements (installed with fix installation) are meant to be certified under the CPR for Reaction-to-fire performances. The CPR certification encompasses the mandatory issue of a Declaration of Performance and the usage of the new CPR CE marking label as prerequisites to place the product on the EU market. In case there is the willingness of some market operator/national authority to declare/certify using the CPR EN50575 framework the reaction to fire performance of a cable which is not specifically in the scope of CPR as just described above, there are two main cases to be considered:

- The cable is not specifically in the scope of the intended use included in CPR EN50575 (i.e. it is a cable for outdoor usage) but it is not a fire resistant cable: despite the original intended use of this cable might not be specifically under the scope of CPR, the cable can be certified by a Notified Body or by a Notified Testing Laboratory accordingly to CPR and the manufacturer can issue an official Declaration of Performance if the manufacturer deem this appropriate. The CE marking remains not legally required to place this product on the EU market, unless the manufacturer knows or can have a reasonable doubt that the final application will be in constructions or civil engineering works. The manufacturer can anyway and regardless the final application (certain or supposed) decide to CE mark with CPR label and draw up a DoP.

The CE-marking and the DoP do not imply that the cable is usable for permanent installation in constructions. That have to be defined by Local Wiring and Installation Regulations. The certification according with EN50575 it's an assessment of performance pre-requisite to place the product on the market, but doesn't itself allow the permanent installation of the cable in constructions in EU Member States

- The cable is not specifically in the scope of the intended use included in CPR EN50575 and it is a fire resistant cable: as fire resistant cables will be touched by the second wave of CPR and be regulated by an ad hoc EN harmonised standard (harmonised technical standard under preparation), it is possible to voluntary test and declare (without making reference to CPR certification) the reaction to fire performance of this cable following CPR EN50575, but Notified Bodies and Notified Testing Laboratory cannot issue any documentation which allow manufacturer or any other market operator to draw up a declaration of performance for this cable. For manufacturer, it is forbidden to label this product with the CPR CE marking label and to issue a DoP: moreover when this product information (results of the reaction to fire tests related with EN50575) will be used on datasheets, catalogues or any other communication mean (physical or online), it has to be presented in a form which is clearly not confusing the users about the fact that there is not a Declaration of performance available for this product.

B. DEFINITIONS

Q09: Under the CPR, who is the manufacturer?

The manufacturer is the person who places the product on the market in the EU. It may be the actual manufacturer or an importer.

Q10: What is the definition of “Construction works”?

When referring to cables, construction works are considered as buildings and other civil engineering works subject to regulation regarding safety in case of fire, including the objective of limiting the generation and spread of fire and smoke.

Q11: What is a Declaration of Performance (DoP)?

The DoP is a document drawn up for every product covered by the CPR by the manufacturer following regulatory guidelines which:

- 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, classes of performance for resistance to fire and release of dangerous substances⁴)

Further information can be found at: http://ec.europa.eu/growth/sectors/construction/product-regulation/performance-declaration/index_en.htm

⁴ see Q40

C. OBLIGATIONS

Q12: Which additional burdens are imposed by the CPR on the industry?

1. An additional testing/certification procedure to current Quality Marks. The severity of this burden is growing with the level of performances declared. Tests are more sophisticated moving up from Class E_{ca} to D_{ca} and upper (from small size flame test to full size fire scenario) and routines of continuous surveillance to certify the conformity to the DoP of the full production of Class C_{ca} and B2_{ca} cables under System 1+ is particularly strict and costly. The CPR implementation impacts many company functions: technical, manufacturing, logistics and quality management, IT
2. The new marking, labelling and electronic distribution of the DoPs required a huge investment to warrant the perfect alignment of all these new documents and texts and to warrant the full availability for end-users. In many cases obliges to add new labels on products. DoPs have to be maintained available for 10 years after the stop of production
3. Most of cables of Classes D_{ca} and above required a full redesign to warrant the conformity of all types to the DoP. New materials have been developed on purpose to fulfil the new Euroclasses and the additional requirements like flaming droplets
4. For all cables of every level of performance much severe consequences in case of non conformity. Up to the total withdrawal of the production from the market

Q13: How will the CPR will be applied in Europe and what will be common and what specific by country?

The CPR should be applied without differences of interpretation by each Member State. The Classification is the common language to define the level of fire performances of cables (Reaction to Fire and in future Resistance to Fire) and to be used in local Regulations and in Users requirements.

Any decision on which Class to adopt for a particular application is a National matter and could vary between different Member States. The wide range of combinations of the parameters (Class + smoke + acidity + droplets) gives the Member States a great flexibility.

Not every Member State regulates the fire performances of cables.

Q14: What are the obligations of the manufacturer under the CPR?

The obligations are set out in Art.11 of the CPR.

Prior to placing a product on the market and when it is covered by a harmonised standard, the manufacturer shall draw up a Declaration of Performance (DoP) and affix the CE marking.

Q15: What is the purpose of the DoP?

The manufacturer, by drawing up his DoP, assumes the responsibility for the conformity of the construction product with the declared performance.

On the basis of the information contained in the DoP, the user will decide to purchase, from all the products available on the market, one which is fit for the intended use of such product and he assumes the full responsibility of such decision.

Q16: What is the basis of the DoP?

All the information supplied in the DoP is obtained by strictly applying the methods and criteria provided in the relevant harmonised standard.

The correct application of these methods and criteria are guaranteed by the manufacturer himself and by the appropriate involvement of a Notified Body, following the applicable system of Assessment and Verification of Constancy of Performance (AVCP).

The affixing of CE marking follows the drawing up of the DoP and indicates that the manufacturer has strictly followed all the applicable procedures for drawing up his DoP which is consequently accurate and reliable.

Q17: When shall a cable bear the CE marking under the CPR?

CE marking for the CPR can only be applied to cables starting from the Date of Applicability published in the OJEU and becomes mandatory at the end of the co-existence period set in the OJEU.. For cables with reaction to fire performance, the product standard (EN 50575:2014 and its amendment EN50575:2014/A1:2016) has been published and a Date of Applicability of 10.06.2016 with a co-existence period ending on 01.07.2017 published in the OJEU.

The product standard for cables with resistance to fire performance is not yet published at the time of publication of these FAQ and such products cannot be CE marked for the CPR until a later date.

Q18: how can a customer recognize a genuine CE-marked cable?

In case of doubts, professionals and consumers can be confirmed of the authenticity of the CE-marking:

- asking to their national Contact Point for Construction
- asking to the Notified Body which is declared on the DoP and on the label

The list of national [Product Contact Point for Construction](#) and of all [Notified Bodies](#) (NANDO; please select Product Family: Power, control and communication cables) is available on the EU website.

Q19: If a product is already CE marked under the LVD on the product itself, does this marking have to be discontinued in order to comply with the EN 50575:2014 + A1:2016 requirement that the CE mark should be on the label?

Yes. A single CE mark is intended to cover all applicable directives/regulations. Under the CPR the CE mark must be accompanied, in the same place, by certain detailed information which it is not possible in practice to print directly on the cable. Printing on the cable only the CE mark without the accompanying info might then be illegal.

Q20: How will the DoP be made available?

The DoP shall be publicly available which may be through a website and shall be provided on request either in paper or electronic form.

Q21: Is the wholesaler / distributor responsible of the application of the CPR?

The CPR describes as follows the general obligation of distributors. *“(omissis) distributors of construction products should be aware of the essential characteristics for which there are provisions on the Union*

market, and of the specific requirements in Member States in relation to the basic requirements for construction works, and should use this knowledge in their commercial transactions" (Foreground (41) of the CPR Regulation No 305/2011).

Moreover **distributors** are subjected to obligations defined by the Article 14, Art.15 and Article 16 of the CPR

When a distributor places on the market a product under his own name the distributor is considered a manufacturer

Importers are subjected to obligations defined by Art.13, Art.15 and Article 16 of the CPR.

Q22: How can the User know that a product is correct for applications under the CPR?

The following elements are necessary for the user:

- knowledge on the Euro class requested by any national regulations for the defined building/construction works
- CE marking with accompanying information related to the certification
- declaration of performance from the supplier

The cable decisions require that for the higher reaction to fire performance classes (A_{ca}, B1_{ca}, B2_{ca} and C_{ca}) and all resistance to fire classes, cables require the System 1+ Assessment and Verification of Constancy of Performance (formally Attestation of Conformity). This requires an accredited third party certification organisation to carry out determination of product type (type testing etc.), initial inspection of manufacturing plant and of factory production control, as well as subsequent continuous surveillance of the FPC and including the verification of samples taken at the factory.

This certification system will help ensure that key parameters affecting safety in the use of cables under fire conditions are properly controlled. Further information can be found at:

http://ec.europa.eu/growth/sectors/construction/product-regulation/avcp/index_en.htm

Q23: Where can you obtain information on requirements for a particular product in a specific member state?

Each member state is required to set up a "contact point" where such information can be obtained.

The updated list of established contact points can be found at:

<http://ec.europa.eu/DocsRoom/documents/10006/attachments/1/translations/en/renditions/native>

Q24: Can I use CE marked cables in non-construction applications?

Yes, but conversely it is not allowed to use cables without the appropriate CE marking in cases where the application is regulated in the Country.

Q25: Can I use in my Country a cable CE marked in another Country?

Yes, the CE marking has a EU validity.

Q26: Are public undertaking private Operators obliged to adopt the CPR Classification in their specifications of cables for permanent installation in constructions?

Yes. Public undertaking private Operators (e.g. rail-way Networks Operators or power and telecom Networks Operators) have to adapt their specification on cables to the CPR language switching references from reaction-to-fire test methods to euroclasses. That descends from Article 8.5 of the CPR (**General principles and use of CE marking**) which states what follows:

“Member State shall ensure that the use of construction products bearing the CE marking shall not be impeded by rules or conditions imposed by public bodies or private bodies acting as a public undertaking, or acting as a public body on the basis of a monopoly position or under a public mandate, when the declared performances correspond to the requirements for such use in that Member State”

D. CE MARKING

TIMING

Q27: When can CE marking of cables begin?

CE marking under the CPR can begin from the Date of Applicability set on the OJEU and becomes mandatory at the end of the co-existence period. For EN50575:2014 and its amendment EN50575:2014/A1:2016 for Reaction-to-fire the date of applicability is set as 10th of June 2016 with co-existence period ending 1st July 2017. No date is yet set for Resistance-to-fire

Q28: At the end of the coexistence period will be necessary to review existing installations to reach the level required by national regulations?

Installation doesn't fall under the scope of CPR. It depends on National Regulations.

STANDARDS AND QUALITY MARKS

Q29: Will the existing fire certification survive?

Yes, but only for applications outside the scope of CPR like industrial applications or outside the EU.

Q30: Will the local quality mark survive?

They will remain important as Voluntary National Quality Marks cover performances different from the CPR, for example, electrical, mechanical, and material characteristics of the cable. They will integrate in a more complete coverage of performances.

Q31: Can voluntary quality marks still be used on CE marked product?

Yes, voluntary certification marks are allowed, but they should not cover fire related performance of cables covered by the CPR.

Q32: Is CE marking more or less important compared with my national quality mark?

CE-marking will be a pre-condition to place cable for construction works on the market. The relevance of the CE marking under the CPR is the elimination of technical barriers among the Member States arising from the definition of fire performances as well as the uniform modality to attest the Conformity of cables.

Quality Marks cover other aspects of the product such as mechanical and electrical performances and dimensions and are unique tools to monitor the compliance with voluntary standards. Therefore a comparison between the CE marking and voluntary National Quality Marks is misleading because they concern two different topics.

Q33: Which Class of Reaction-to-Fire corresponds to IEC60332 series test?

Class E_{ca} and Class F_{ca} are defined with reference to the Flame propagation test IEC/EN 60332-1-2 (respectively meeting or not meeting the required max threshold of propagation). Class F_{ca} is under AVCP System 4, therefore this has to be assessed by the manufacturer.

For the other classes, there is not a direct relationship between existing IEC test based and CPR performances due to the different test methods. Despite the fact that the basic structure of the test rig is exactly the same, the different mounting and the use of new parameters makes the test results not comparable.

Q34: Is it possible to combine CPR and LVD declarations?

No because LVD requires a Declaration of **Conformity** and CPR requires a Declaration of **Performance**, the two should be kept separate. However, the one CE mark on the CPR label would also cover **LVD**

PRODUCT IDENTIFICATION

Q35: How will the CE mark be applied to cables?

According to the product standard, the CE mark shall be applied to the product label in all cases.

Q36: What is the meaning of date when marking first affixed?

This is the date when the CE mark was first affixed to a particular product. It is NOT the date of production of the cable.

Q37: How do CPR requirements affect cable imported from outside the EU?

The CPR requirements will apply as soon as the cable is placed on the market in the EU.

PRODUCT CHARACTERISTICS AND PERFORMANCES

Q38: How will cables change?

Almost all cable families will require reassessment and potential adjustment because the existing levels of performances do not match the Classes B2_{ca}, C_{ca} and D_{ca}.

Q39: Will all European cables be harmonized?

Only the fire performances will be harmonized. The national cable types will remain unchanged except the declared fire performances.

Q40: If fire performance products are already available, what are the CPR and new rules and regulations going to contribute?

The Class of Reaction-to-Fire Table takes into account the entire behaviour of cables in fire, dynamically measured against time on real size samples. This is an important step forward in fire safety and allows National Authorities to treat cables in a similar manner to other construction products already covered by the CPR.

The Class of Reaction-to-Fire table will become a standard feature of building regulations in Europe, though they are likely to be applied differently across the EU. Indeed each country, under the principle of subsidiarity, will decide how these classes are to be used in its construction standards and/or regulations. It should be noted that it is not mandatory for classification to be introduced into National regulations and some countries may take the decision to address this issue in other ways.

These Classes will however certainly become a point of reference as, whatever their application, they will be common to all products. The performance level of the products defined by the classes will be clearly understood by all European decision makers. The products brought to market will comply with strenuous testing requirements, and continue to ensure that the safety of persons, animals and goods in fire hazards can be protected.

Q41: How is the declaration of performance in relation to the release of dangerous substances to be dealt with?

There are presently no European harmonised provisions (prescriptions and supporting test methods) related to the release of dangerous substances applicable to cables. According to the EN 50575:2014, reference should be made to relevant national regulations if any.

If a cable is placed on the market in a MS where such regulations exist, its DoP and label should then refer to them.

In countries where no national regulations (relevant for cables) exist, the mention of “No Performance Determined (NPD)” should be made in the DoP and no mention is then required on the CE Marking label.

Independently, the CPR requires that the information about the potential content of hazardous substances as may be declared in the framework of the Regulation (EC) No 1907/2006 (REACH) shall be provided together with the declaration of performance.