

CONSTRUCTION PRODUCTS REGULATION (CPR) – CABLE

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The Official Position of the European Union of Electrical Wholesalers on **CONSTRUCTION PRODUCTS REGULATION(CPR)- CABLE**

European regulation n°305/2011 as well as norms relative to its application (norms EN 13501-6, EN 50399, EN 50575) are of mandatory usage since July 1st, 2017 for energy, command and communication cables.

The mandatory CE marking affects all cables that can be integrated to the following construction buildings: individual houses and collective households, public and work facilities (public building/premises, high-rise building), industrial and risk sites, civil engineering works (road and railway tunnels, bridges, train and metro stations).

If no one can contest the validity of this regulation (which also allows product traceability), the main difficulty comes from the fact that the CE marking is not attached/marked on the cable itself but only on factory conditionings (reels, drums...). Because of that, cutoffs cables do not mention it. In Europe, this activity is not marginal (30% of cuts are inferior to 30 meters). Even installers are buying reels or drums and have to realize cuts to answer their projects' needs, yet installers and distributors (90% of small and medium sized companies or self-employed) are asked to deliver the CE marking on cutoffs cables when selling.

Thus, this regulation has brought a responsibility on these market actors that is opposed to the will of European texts. In accordance to article 30, paragraph 1 of regulation 765/2008, nor the installer or the distributor can attached/marked the CE marking on cutoffs cables. This responsibility relying on the manufacturer only (or its representative), it would be more appropriate for the marking to be put directly on the cable, with coherent and regular spacing to remain visible in case of cuts.

Unfortunately, nowadays some countries retained a far less acceptable solution consisting in enjoining manufacturers to provide CE labels in sufficient quantity to allow relabeling. Even less acceptable that manufacturers refuse to do it, arguing that the distributor and installer shall mention this information on other documents (invoice, delivery note...), which do not solve the problem and,

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as seen previously, is contrary to article 30 paragraph 1 of regulation 765/2008 which indicates: *“The CE marking shall be affixed only by the manufacturer or his authorized representative.”*

Let us remind that distributors and installers have the obligation to make sure the product “gets the CE marking where required” and that it is coming with the mandatory documents required by the regulation. However, this obligation’s “warrant” applies to off-the-shelf products, not cutoffs.

In the digital era we have to clarify rules regarding this issue and enjoin manufacturers to do whatever is necessary for the marking to be directly marked on the cable (marker, flash codes, QR codes...) in conformity with European texts. Others CPR products (tiles, bricks, building blocks...) under the same regulations are having a marking directly on the product, allowing anyone to find mandatory information (CE label, declaration of performance) on the manufacturer, distributor or installer’s website. Cables should also benefit from this process that would enable a tremendous simplification for all involved actors.

Going through the 21st century, having to make use of photocopies or trying to obtain markings is not really conceivable. In addition, relabeling errors may occur, making traceability unreliable.

The documentation to be published at every level of the supply chain, as well as its complexity relative to the nature of the product (cable is intended to be cut) but also its destination (depending on construction/site type – building/renovation/maintenance) are of growing importance. The effort deployed by the supply chain should apply to product traceability, not through circulation between actors but rather through guaranties over its original qualities. One should spot the difference between logistic and product traceability. The spirit of CPR applies to the latter. Given the technicity and sensitivity of the requested information, this responsibility – which juridically is of the manufacturer or its representative – should not be entrusted to distributors or installers.

CPR is focusing on the end user, but in case of sinister an installer can be asked to prove that he has installed a fire-resistant cable. As such, it is important to allow the installer to find mandatory information in the simplest and fastest way possible, including on sites where cables are installed. Since the current regulation does not allow it, cable marking appears to be a necessity.