



How Prysmian has implemented the CPR, UKCA & CE marking and DOP

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Under the CPR cable manufacturers must apply a UKCA or CE mark, depending on the market and make a declaration of performance, define legal responsibility and issue a Declaration of Performance (DOP).

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The Cable Distributor or Wholesaler is somebody in the supply chain who sells on cable already placed on the market.

Importers

Any company that imports cable from outside of the UK or EU, must ensure the cable is CPR compliant and has a UKCA or CE mark and a DOP.

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CPR for Cable

How Prysmian has implemented the CPR

Since 1st July, 2017 all relevant products supplied by Prysmian are CPR (Construction Product Regulations) compliant before they leave our factories.

The CPR covers any cable product placed on the market for incorporation, in a permanent manner, within construction works.

This includes both buildings and civil engineering works and covers cable in terms of reaction to fire.

For any relevant cable supplied, the manufacturer must declare its performance in terms of the reaction to fire properties laid out in BS EN 50575. This can cover: -

- Flame propagation
- Heat release
- Flame spread
- Smoke production
- Acidity
- Flaming droplets

The cables must be tested by an Approved/Notified Body for the applicable market to prove the declared performance. E.g., BASEC, 3P

Upon receipt of the Approved/Notified Body approval, the manufacturer must produce a Declaration of Performance (DOP) document, which must be made available for customers and retained for 10 years.

The performance levels must be shown on the product labels as part of the UKCA or CE marking requirements. A cable cannot be UKCA or CE marked, without an appropriate Approval/Notified body approval and a published DOP.

At a future point the CPR will be extended to include fire resistant cables. It shall be noted, these are not currently covered by the Product standard BS EN 50575 and are currently excluded from CPR. It is therefore not permissible for a manufacturer to declare a classification for fire resistant cable products.

Please be aware that unlike existing British (BS) and European standards (BS EN), the CPR is a legal requirement under UK law and can be enforced by the HSE and trading standards.

Since 1st July 2017, cable products intended for building or construction works, must comply with the CPR.

UKCA & CE Marking

Mandatory points of the Marking

The UKCA or CE Marking symbol in accordance with UK Regulation reference. Regulation (EC) no.765/2008 and as it has effect in the UK, followed by:

- Identification number of the Approved/Notified body.
- Name and registered address of manufacturer or identifying mark.
- Last two digits of year in which marking first affixed.
- Reference number of DoP
- Dated reference to British European standard applied (BS EN 50575:2014)
- Unique identification code of product-type
- Intended use as laid down in British European standard applied (BS EN 50575:2014)
- Declared performance (given as classes, statement on dangerous substances or NPD)

DoP

What is a Declaration of Performance (DOP) and what information does the UKCA/CE mark need to declare?

The Declaration of Performance must show:

- Declaration of performance number
- Unique identification code of the product-type
- Intended use.
- Manufacturer
- Authorised representative
- System/s of AVCP
- Designated/Harmonised standard & Approved/Notified body.
- European Assessment Document/European Technical Assessment/Technical Assessment Body/Approved/Notified body.
- Declared performance.

Appropriate Technical Documentation and or Specific Technical Documentation

* Where cable is imported from outside the UK/EU then the Importer is responsible.

The UKCA/CE label must be applied to the cable packaging and must show:

- Identification number of the testing body.
- Name and address of the manufacturer.
- The year cable first put on the market.
- The DOP reference number.
- The declared Class reference.
- The British or European product standard.
- Declared Class performance.
- A unique identification code.
- Intended use of the product.
- Name and address of the Authorised Representative (if applicable).

This is significantly more information than previously appeared on many products available in the market place. This change has made it harder to sell sub-standard cables.

Declaration of Performance - Model Declaration

- The model may be modified, provided all the mandatory information is made available in a clear and coherent manner.
- A single DoP may cover different variations of a product type (e.g. colours, conductor sizes) but a unique identification code shall be given for each variant.

Mandatory points of the Declaration of Performance (DoP)

Number of the DoP which may be the same as the unique identification code of the product type.

1. Unique identification of the product type
2. The intended use (to be taken from the applicable designated/harmonised standard)
3. Name, trade name or mark and contact address of the manufacturer
4. Authorised representative (as applicable)
5. System of AVCP (System 1+ or System 3)
6. Harmonised standard (BS EN 50575 for reaction to fire and the identification number of the notified body for System 1+)
7. European Technical Assessment (omitted for cables)
8. Declared performance (given as classes, statement on dangerous substances or NPD)
9. Specific Technical Documentation (omitted for cables)

Cable Installers

What does the CPR mean for electrical contractors?

The Construction Products Regulation (CPR) brought about significant change for the supply of cable into the UK market, as it makes it a legal requirement for cable to be tested and approved before it can be placed on the market.

Until July 2017, it had not been illegal for substandard cable to be imported and sold into the UK. For contractors, and for reputable cable manufacturers, the introduction of CPR was beneficial as it introduced legally binding regulations concerning the quality of cable offered for sale.

Since 1st July 2017, all cable to be intended for permanent installation in buildings must be tested to declare its performance in relation to fire. The tests required relate to the way the cables behave in a fire, rather than the ability of the cable to resist the effect of fire.

To be CPR compliant, a cable must be accompanied by a Declaration of Performance (DoP) to demonstrate that it has been tested and certified by a legally appointed Approved/Notified testing body to comply with the relevant performance tests.

This puts a whole new level of responsibility on the manufacturers, distributors and wholesalers of cables, but simplifies life for contractors and installers.

As you would expect, Prysmian continues to work hard with this regulation and all Prysmian cable is fully compliant with the regulations. As the UK's largest manufacturer of cable, Prysmian is delighted that the CPR regulations have helped to remove substandard cable from the market: another step forward in the drive to improve the safety of products used in UK buildings.

For contractors buying cable made by reputable manufacturers and supplied through reputable wholesalers, the new regulation simply provides further assurance that the cable purchased performs as it should. Our advice to contractors remains the same: always buy a recognised brand from a reputable wholesaler.

The CPR provides additional assurance that both manufacturer and wholesaler have had to satisfy the regulators before selling any cable for permanent installation into buildings.

Cable Manufacturers

What does CPR mean for Cable Manufacturers?

Under the CPR, cable manufacturers must:

- Apply a UKCA/CE mark to indicate the product is consistent with its declaration of performance.
- Make a declaration of performance (DOP) with regard to reaction to fire.
- Assume legal responsibility for the performance of this product to its declared performance.
- Issue a DOP based on 3rd party testing by a recognised Approved/Notified body.

Manufacturers shall draw up a declaration of performance in accordance with Articles 4 and 6 and affix the UKCA/CE marking in accordance with Articles 8 and 9.

Manufacturers shall, as the basis for the declaration of performance, draw up technical documentation describing all the relevant elements related to the required system of assessment and verification of constancy of performance.

Manufacturers shall keep the technical documentation and the declaration of performance for a period of 10 years after the construction product has been placed on the market. Where appropriate, the Secretary of State or Commission may, by means of delegated acts in accordance with Article 60, amend that period for families of construction products based on the expected life or part played by the construction product in the construction works.

Manufacturers shall ensure that procedures are in place to ensure that series production maintains the declared performance. Changes in the product-type and in the applicable designated/harmonised technical specifications shall be sufficiently taken into account.

Manufacturers shall, where deemed appropriate with regard to ensuring the accuracy, reliability and stability of the declared performance of a construction product, carry out sample testing of construction products placed or made available on the market. They shall investigate, and, if necessary, keep a register of complaints, of non-conforming products and of any product recalls, and keep distributors informed of any such monitoring.

Manufacturers shall ensure that their construction products bear a type, batch or serial number or any other element allowing their identification. Where the size or nature of the product does not allow it, then the required information is provided on the packaging or in a document accompanying the construction product.

Cable Distributors

What does CPR mean for Cable Distributors?

The cable Distributor or Wholesaler is somebody in the supply chain who sells on cable already placed on the market. They must:

- Ensure cables they supply bear the correct UKCA or CE marking.
- Ensure the manufacturer/importer has complied with all the relevant CPR requirements.
- Not supply any product they believe does not conform to its declared performance.
- Ensure that if they believe a product is not in conformity, withdraw or recall it.

When making a construction product available on the market, distributors shall act with due care in relation to the requirements of this Regulation.

Before making a construction product available on the market, distributors shall ensure that the product, where required, bears the appropriate UKCA or CE marking and is accompanied by the documents required under this Regulation and by instructions and safety information in a language determined by the Member State concerned which can be easily understood by users. Distributors shall also ensure that the manufacturer and the importer have complied with the requirements set out in Article 11(4) and (5) and Article 13(3) respectively. Where a distributor considers or has reason to believe that a construction product is not in conformity with the declaration of performance or not in compliance with other applicable requirements in this Regulation, the distributor shall not make the product available on the market until it conforms to the accompanying declaration of performance and it complies with the other applicable requirements in this Regulation or until the declaration of performance is corrected. Furthermore, where the product presents a risk, the distributor shall inform the manufacturer or the importer thereof, and the market surveillance authorities.

A distributor shall ensure that, while a construction product is under their responsibility, storage or transport conditions do not jeopardise its conformity with the declaration of performance and compliance with other applicable requirements in this Regulation. Distributors who consider or have reason to believe that a construction product which they have made available on the market is not in conformity with the declaration of performance or not in compliance with other applicable requirements in this Regulation, shall make sure that the corrective measures necessary to bring that product in conformity, to withdraw it or recall it, as appropriate, are taken. Furthermore, where the product presents a risk, distributors shall immediately inform the competent national authorities of the Member States in which they made the product available thereof, giving details of the non-compliance and of any corrective measures taken.

Distributors shall, further to a reasoned request from a competent national authority, provide it with all the information and documentation necessary to demonstrate the conformity of the construction product with the declaration of performance and compliance with other applicable requirements in this Regulation in a language which can be easily understood by that authority. They shall cooperate with that authority, at its request, on any action taken to eliminate the risks posed by construction products which they have made available on the market.

Cable Importers

What does CPR mean for Cable Importers?

Any company that imports electric cable from outside of the UK or EU must:

- Ensure the cable is CPR compliant and has a UKCA or CE mark and a relevant DOP.
- Mark on the packaging their name, registered trade name or mark and their contact address.
- Carry out sample testing of the products, keep a register of complaints, non conformance and product recalls.
- Keep a copy for 10 years of the DOP for all products they supply.
- Make documents available to market surveillance authorities

In this case Compliance is the obligation of the importer not the exporting manufacturer.

Importers shall only place on the UK or EU market, construction products which are compliant with the applicable requirements of this Regulation.

Before placing a construction product on the market, importers shall ensure that the assessment and the verification of constancy of performance has been carried out by the manufacturer. They shall ensure that the manufacturer has drawn up the technical documentation referred to in the second subparagraph of Article 11(1) and the declaration of performance in accordance with Articles 4 and 6.

They shall also ensure that the product, where required, bears the UKCA or CE marking, that the product is accompanied by the required documents and that the manufacturer has complied with the requirements set out in Article 11(4) and (5). Where an importer considers or has reason to believe that the construction product is not in conformity with the declaration of performance or not in compliance with other applicable requirements in this Regulation, the importer shall not place the construction product on the market until it conforms to the accompanying declaration of performance and it complies with the other applicable requirements in this Regulation or until the declaration of performance is corrected.

Furthermore, where the construction product presents a risk, the importer shall inform the manufacturer and the market surveillance authorities thereof.

Importers shall indicate on the construction product or, where that is not possible, on its packaging or in a document accompanying the product their name, registered trade name or registered trademark and their contact address.

Importers shall ensure that, when making a construction product available on the market, the product is accompanied by instructions and safety information in a language determined by the Member State concerned which can be easily understood by users.

Importers shall ensure that, while a construction product is under their responsibility, storage or transport conditions do not jeopardise its conformity with the declaration of performance and compliance with other applicable requirements in this Regulation.

Importers shall, when deemed appropriate with regard to ensuring the accuracy, reliability and stability of the declared performance of a construction product, carry out sample testing of construction products placed or made available on the market, investigate, and, if necessary, keep a register of complaints, of non-conforming products and of product recalls, and shall keep distributors informed of any such monitoring.

Importers who consider or have reason to believe that a construction product which they have placed on the market is not in conformity with the declaration of performance or not in compliance with other applicable requirements in this Regulation, shall immediately take the necessary corrective measures to bring that construction product into conformity, or, where appropriate, to withdraw or recall it. Furthermore, where the product presents a risk, importers shall immediately inform the competent national authorities of the Member States in which they made the construction product available thereof, giving details, in particular, of the non-compliance and of any corrective measures taken.

Importers shall, for the period referred to in Article 11(2), keep a copy of the declaration of performance at the disposal of the market surveillance authorities and ensure that the technical documentation is made available to those authorities, upon request.

Importers shall, further to a reasoned request from a competent national authority, provide it with all the information and documentation necessary to demonstrate the conformity of the construction product with the declaration of performance and compliance with other applicable requirements in this Regulation, in a language which can be easily understood by that authority.

They shall cooperate with that authority, at its request, on any action taken to eliminate the risks posed by construction products which they have placed on the market.