

26th July 2017

Opinion on CPR cables and electrical assemblies¹

We are referring to the question whether or not the use of CPR cables inside electrical assemblies is mandatory, particularly cables subject to EU Regulation 305/2011, which sets harmonized conditions for selling construction products and repeals Council Directive 89/106/EEC (in short, CPR).

Given that:

- CPR defines:
 - “construction product” any product or kit which is manufactured and placed on the market for incorporation in a permanent manner in construction works or in their parts and the performance of which has an effect on the performance of the construction works with respect to the basic requirements for construction works;
 - “construction works” are buildings and civil engineering works;
- CPR requires that the manufacturer must draw up a performance declaration and that put the CE marking to a construction product only when it falls within the scope of a harmonized standard and published on OJEU (Official Journal of the European Union) or is compliant with a European technical evaluation issued for the product in question;
- assemblies are apparatus subject to the scope of Directive 2014/35/EU on the harmonization of the laws of the Member States relating to availability on the market of electrical equipment for use within certain voltage limits (in short, LV Directive), as well as Directive 2014/30/EU on the harmonization of the laws of the Member States relating to electromagnetic compatibility (and the relevant national transposition decrees);

considering all this, conclusions are that:

- electrical assembly is not subject to CPR, as it is not a construction work or part of it (ref. Reg. UE 305/2011 – Annex IV – Table 1 “Product areas”) and it’s very difficult to consider it as a construction product according to the legal definitions mentioned above; there are, however, no harmonized standards for CE marking of electrical assemblies for CPR purposes;
- safety of the assembly should therefore be evaluated solely regarding LV Directive and the safety requirements there expected;
- in this context, harmonized standards for the LV Directive, whose application gives compliance with the safety requirements of the Directive, do not require use of CPR cables within electrical assemblies.

¹ The information in this document for electrical assemblies is also valid for busbar trunking systems that refer to the same family of standard IEC 61439