

Europacable proposal on coexistence of CPR-based certifications for power, control and communication cables with EU Member State-based certifications for installations: An opportunity to overcome the challenges of addressing different requirements at both EU and national level in the framework of the current review of fire resistance classification.

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Europacable, the voice of Europe's wire and cable manufacturers, invites the European Commission and Member States to consider the following comments which Europacable submits in the ongoing consultation on the second version of the draft proposal for a *Delegated Act on the review of the resistance to fire classification*. Europacable's comments provide the opportunity to overcome the challenge of addressing the different existing fire resistance requirements in Europe and at Member State level and to ensure a workable, legal and suitable solution which would not compromise fire safety.

1. Europacable supports the inclusion of "power, control and communication cables" into the scope of the draft Delegated Act, as foreseen by the European Commission in their first version and in line with product family group No 31 as mentioned in existing EU legislation¹. This will establish a common language for the definition of harmonised certifications regarding the resistance to fire performance of construction products.
2. That being said, we emphasise that such inclusion, "should not affect the right of Member States to specify the requirements they deem necessary to ensure the protection of health, the environment and workers when using construction products", as stated in recital No 3 of Regulation No 305/2011/EU.
3. In consequence, some Member States already provide for national certification requirements for the combined interaction of individual products within installations. The certification is deemed essential for the protection of the health and safety of workers and users, and has been triggered primarily for that purpose.
4. In addition, while Regulation No 305/2011/EU sets out the conditions for the marketing of construction products, the Member States are in any event responsible for fire safety applicable to construction works. As the above-mentioned national certification requirements relate to installations within construction works, they fall in any case outside the remit of Regulation No 305/2011/EU and must continue to be allowed without compromise.

Therefore, the new draft Delegated Act should recognise the legal coexistence of harmonised certifications for fire-resistance performance of power, control and communication cables and Member State-based certifications for installations which have been established in some EU Member States for many years. Clearly the latter provide an additional and compatible layer of fire safety requirements targeting the installation performance within construction works, which fall outside the scope of Regulation No 305/2011/EU and which must not be compromised.

¹ Regulation No 305/2011/EU; and Commission Decision of 12 May 2011 on the procedure for attesting the conformity of construction products pursuant to Article 20(2) of Council Directive 89/106/EEC as regards power, control and communication cables

Europacable supports the harmonisation of fire resistance performance via P_{ca} and/or PH_{ca} classifications, as suggested in the draft Delegated Act targeting construction products, as per definitions in articles No 2.1 and 2.2 of Regulation No 305/2011/EU. However, national requirements for installations must not be compromised as they certify the fire-resistance performance stemming from the combined interaction of different products within installations, tested in a real-life environment in construction works.

For the sake of clarity and coherence with current mandates M443 and M117², Europacable suggests that both the headers of section “No 6. Products to be used within electrical building service installations”, subsections on “Unprotected electrical cables” and “Unprotected small electrical cables” should be replaced respectively with:

“Unprotected electric cables with intrinsic fire resistance” and “Unprotected small electric cables with intrinsic fire resistance (<20 mm diameter and with conductor sizes $\leq 2.5 \text{ mm}^2$)”

To ensure the legal coexistence of harmonised certifications as well as that power and control cables are effectively tested at the rated level, Europacable suggests the following modifications to the “Notes” of both newly reworded subsections on “Unprotected electric cables with intrinsic fire resistance” and “Unprotected small electric cables with intrinsic fire resistance”:

- The replacement of the current text with the following sentence: *“Power and control cables shall be tested at rated voltage; this information (testing at rated voltage) shall be indicated in documentation such as in the testing report, the Declaration of Performance and/or on the labelling”*; and
- The inclusion of the following text: *“The Member States’ right to impose national certification requirements on installations, which are a combination of products installed in construction works, continues to be permitted.”*

In addition, Europacable suggests the deletion of the following classifications from both P_{ca} and PH_{ca} as not mentioned in the original mandate³:

“Classifications 20 minutes, 45 minutes, 180 minutes, 240 minutes and 360 minutes”

² M/443 Mandate to CEN and CENELEC concerning the execution of standardisation work for harmonized standards on power, control and communication cables related to the following end uses:24/33: supply of electricity,26/33: communications,28/33: fire detection and alarm; and

M/117 Horizontal complement to the mandate to CEN and CENELEC concerning the execution of standardisation work for the evaluation of construction products and elements in respect of their resistance to fire

³ Please note that fire resistance P_{ca} classifications of 180 minutes and above should be excluded with regard to electric cables as the melting temperature of conductor materials such as copper is passed.

Annex: Europacable suggested amendments to draft Delegated Act on the review of the resistance to fire classification

Europacable suggested amendments in bold and track changes

6. Products to be used within electrical building service installations

Applies to	Fire protective systems for cable systems and associated components										
Classification:											
P		15	20	30	45	60	90	120	180	240	360
Notes	<p>The classification shall indicate: The type of cables which can be installed within the fire protective systems, i.e. any standard cable or only specific cables; and the cables configurations which can be protected and the operating voltage, i.e.;</p> <ul style="list-style-type: none"> • either to all types of power cables (rated voltage 300/500 V) for an operating voltage up to 230/400 V (three-phase AC); • either to all types of power cables (rated voltage 450/750 V up to 0,6/1 kV) for an operating voltage up to 400/690 V (Three-phase AC); • either to all types of signal-/control cables (rated voltage up to 170 V) for an operating voltage up to 110 V; • or any combination of the above possibilities. 										
Applies to	Unprotected electrical electric cables with intrinsic fire resistance										
Classification:											
P _{ca}		15	20	30	45	60	90	120	180	240	360
Notes	<p>For power cables and control cables the classification shall indicate for which maximum voltage the performance criteria are satisfied. Power and control cables shall be tested at rated voltage; this information (testing at rated voltage) shall be indicated in documentation such as in the testing report, the Declaration of Performance and/or on the labelling.</p> <p><u>The Member States' right to impose national certification requirements on installations, which are a combination of products installed in construction works, continues to be permitted.</u></p>										
Applies to	Unprotected small electrical electric cables with intrinsic fire resistance (<20 mm diameter and with conductor sizes ≤2.5 mm ²)										
Classification:											
PH _{ca}		15	20	30	45	60	90	120	180	240	360
Notes	<p>The classification shall indicate for which maximal voltage for power cables the performance criteria are satisfied. Power and control cables shall be tested at rated voltage; this information (testing at rated voltage) shall be indicated in documentation such as in the testing report, the Declaration of Performance and/or on the labelling.</p> <p><u>The Member States' right to impose national certification requirements on installations, which are a combination of products installed in construction works, continues to be permitted.</u></p>										