



# EDA's Nottingham Regional Business Forum

## Uncertainty – How will Grenfell, CPR, the 18<sup>th</sup> Edition and Brexit shape the future of our Industry

**Martin Boorman,**  
UK Sales Manager  
Prysmian Group.



# Today's Presentation

## Uncertainty as an Opportunity

---

Introduction

The Hackitt Report

The ACI – And unsafe Cable

CPR – 1 Year on

The 18<sup>th</sup> edition

Brexit

Conclusion



# An environment of change





# Dame Judith Hackitt's Report

## BUILDING A SAFER FUTURE INDEPENDENT REVIEW OF BUILDING REGULATIONS AND FIRE SAFETY: FINAL REPORT



Prysmian  
Group

May 2018



A brand of the  
**Prysmian**  
Group



# A personal view from Dame Judith Hackitt

“As the review progresses, it has become clear that the whole system of regulation... is not fit for purpose, leaving **room for those who want to take shortcuts to do so.**”

“**What is initially designed is not what is being built**, and quality assurance of materials and people is seriously lacking”

“ I have been shocked by some of the practises...and will hold to account those who try to **cut corners**”

“ The mindset of **doing things as cheaply as possible** and passing on responsibility for problems and shortcomings to others must stop”



# Summary of the report – extracts

- There needs to be a **golden thread**... so original design intent and any subsequent changes and recorded and properly reviewed.
- There is a need for stronger and **more effective enforcement activity**, backed up with sufficiently powerful sanctions for the few who do not follow the rules
- The Building Regulations 2010 are clear about the outcomes to be achieved but not about **where responsibilities lie**
- There is **widespread deviation from what is originally designed to what is actually being built**, without clear and consistent requirements to seek authorisation or review, or to document changes made. The current trend for “design and build” contracts has been identified as particularly problematic...



# Direction of Travel for Phase 2 of the review

- Phase 2 will focus on defining a revised regulatory system... risk based and proportionate
- The focus must **shift from achieving lowest cost** to providing **buildings which are safe...**
- Approved document B needs to be simplified and brought up to date
- Primary responsibility for ensuring that buildings are built to the correct standards and are fit for purpose must rest with those who commission the work and those who design and build the project. **Responsibilities must not be dispersed through the chain as they are now.**
- It has also been observed that the use of **value engineering** is almost always about cutting cost out of a project, at times without due reference to key specification requirements.
- Those charged with enforcing must have appropriate enforcement powers accompanied by **sanctions and penalties** which are suitably severe



# Highlights from the report

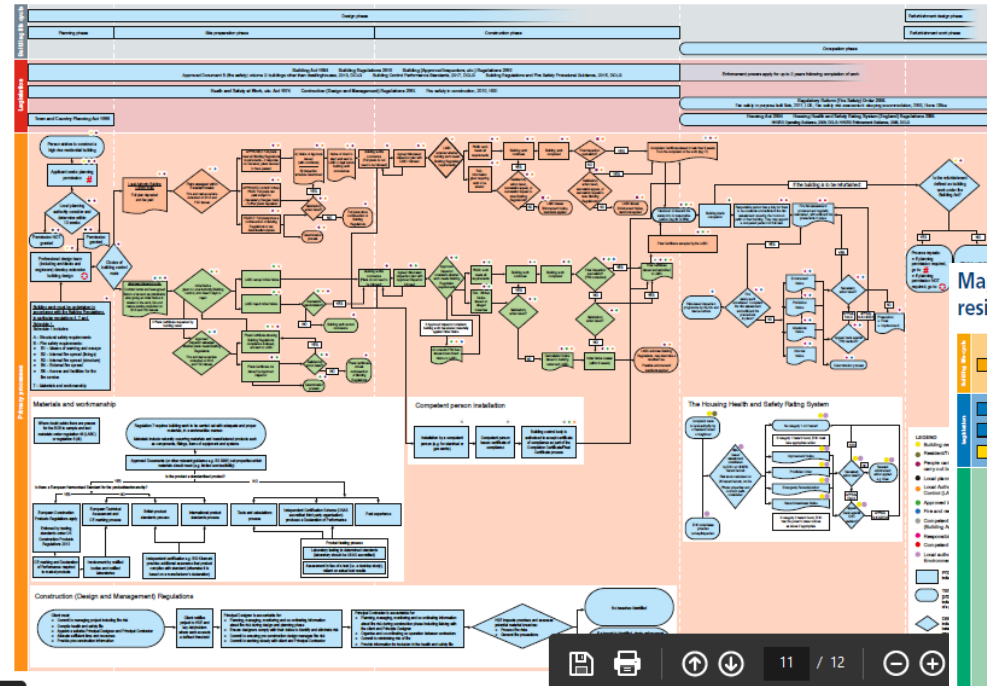
- There is currently a motivation to do things as quickly and as cheaply as possible rather than **deliver quality**.
- What is required is an outcome based system not one based on prescriptive rules or complex guidance. This requires people to be competent and thinking for themselves rather than **blindly following guidance**.
- There is **no audit trail** through the life cycle of a building and no clear duty holder responsible for its fire safety
- A Joint **Competent Authority (JPA) should be created** consisting of HSE, Fire & Rescue Authorities' and Local Authority Building Standards.





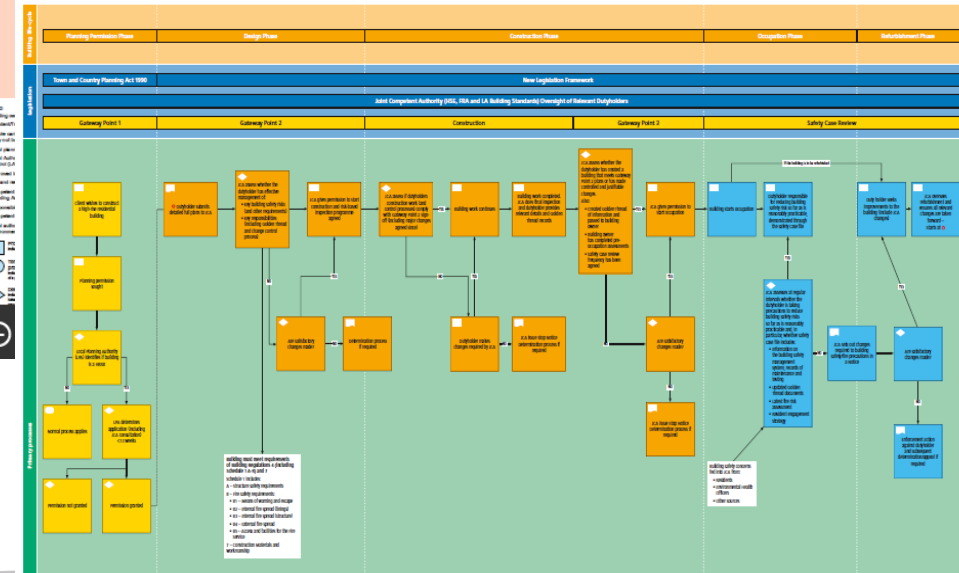
# Clearer Mapping

Figure 1: Map of the current regulatory system for high-rise residential buildings



**The regulatory system**  
**needs to be simplified**  
**and clarified**

Mapping the new building safety regulatory framework – construction and occupation of a higher-risk residential building (HRRB)





# Report: Parameters, Design & Products

- Introduce mandatory occurrence reporting ( **whistleblowing**).
- Building safety is currently not sufficiently prioritised and **responsibility is handed down** through sub contractor agreements.
- Design and build contracts & value engineering result in **uncontrolled, undocumented and poorly designed changes** being made.
- Create a golden thread of information – **Digital records** of building work, Fire and emergency file, full building plans and construction control plan– not clear if the original design has been changed...
- **Products must be properly tested** and certified, and labelled and marked appropriately
- Allow duty holder to have **a complete digital record of all products used** in construction.



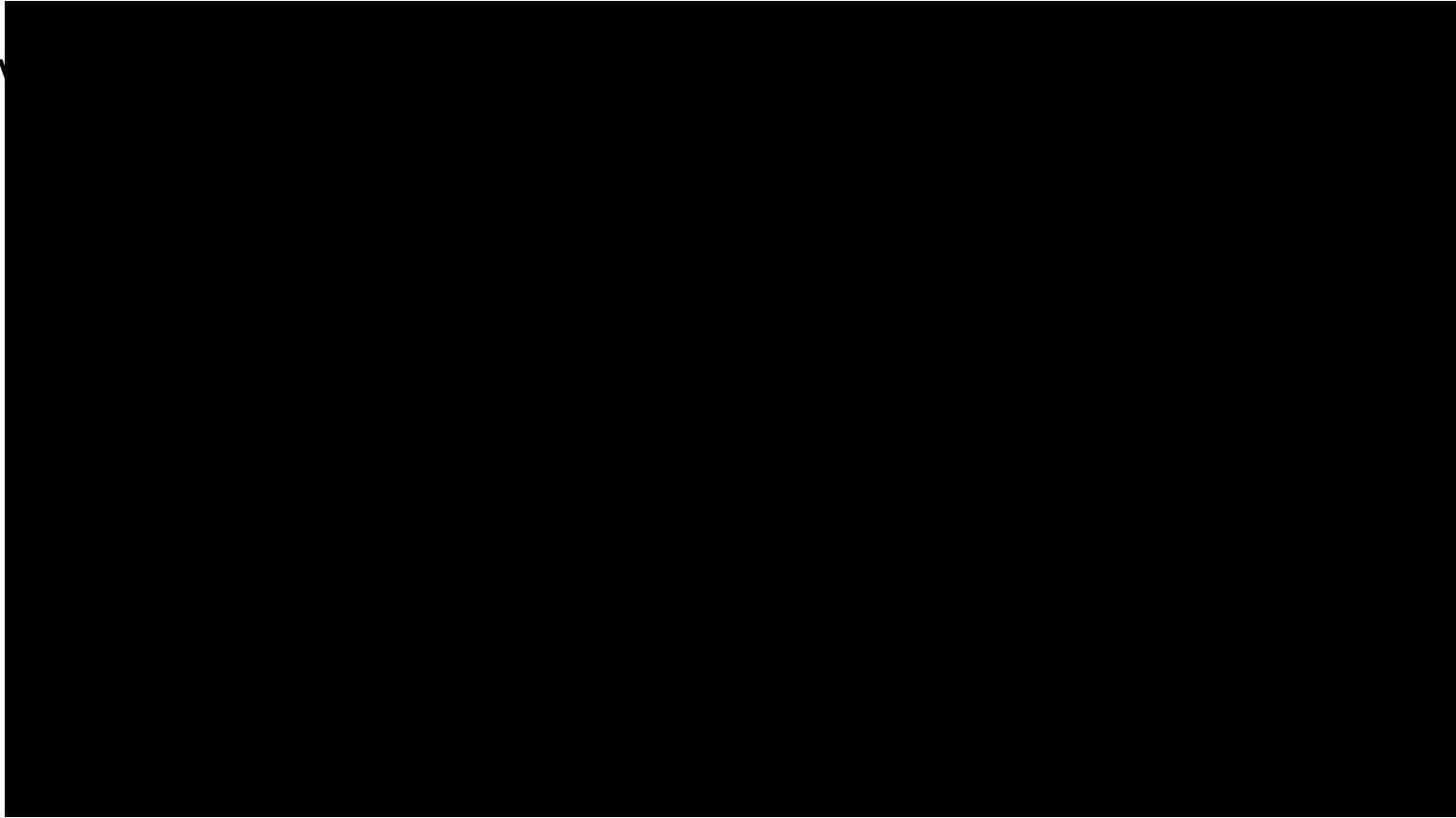
# Approved Cable Initiative (ACI)

How safe is the  
cable you buy?

Is it to the  
required  
specifications?



Play Fake Britain Y





# LOW QUALITY IMPORTS – A Global issue



## **CASE 1: Infinity/Olsent Cables Australia 2010-2013 were:**

- imported and installed in an estimated 40,000 homes and commercial offices in Australia.
- failed to meet electrical safety standards due to poor quality insulation.
- To date, 27 suppliers have announced recalls of Infinity/Olsent cables.
- In August 2015, NSW Fair Trading issued a mandatory recall notice under the NSW electrical safety regulations to a further 25 suppliers

## **CASE 2: E-cables PTY Australia Oct 2014.**

- discovered to withstand half the temperatures claimed.
- the cable had been in circulation in Australia for 2 years
- Energy Safe Victoria (ESV), an independent technical regulator, issued a mandatory recall notice for copper clad aluminium (CCA) power cable supplied since 2011..
- These cables had been sold to electricians and were used in residential buildings & hotels

## **CASE 3: SKL Cables Australia 2015**

- cables manufactured in China and imported by SKL was found to break down and become brittle prematurely.
- A prohibition notice was issued affecting SKL brand twin and earth cable





# Approved Cables Initiative

*Our aim is to stop sub-standard, non approved or dangerous  
cable entering the UK market*

## **Approved Cables Initiative (ACI)**

**Established 2010 to educate  
and inform the electrical  
supply industry of sub-  
standard, non-approved and  
unsafe cable.**

To date many millions of metres of  
defective cable have been removed from  
the market place.

**ACI is the first initiative of its kind and  
has Trading Standards and Health &  
Safety Executive support.**





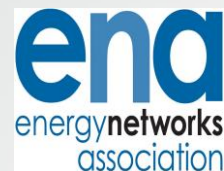
## Sub-standard cable - not just a UK problem - it is a worldwide concern.

- France, China, South Korea, India, the Middle East and Australia all reported issues with sub-standard cable recently.
- Some have better legislation for managing and control their import:
  - *From August 2014, the importation, entry, selling and/or display of non-complaint cables and low voltage electrical wire into the United Arab Emirates (UAE) is prohibited and only compliant products, having the necessary ESMA Certificate of Conformity, will be allowed into the country.*





# Our industry supporters





Communicates  
with cable supply  
industry and  
member  
associations



Communicates  
with Government,  
meeting as  
appropriate with  
relevant Ministers  
and MPs/MEPs)



Communicates  
with other  
industry sectors  
to share  
experience and  
knowledge

ACI advises and informs stakeholders on sub-standard cables issues

# The sub-standard cable problem

Positive  
work

Negative  
actions

Millions of metres of sub-standard cable removed and destroyed

Awareness of the sub-standard cable issue has been heightened

UK Distributors order overseas manufacturers to produce under sized cable

Mis-selling of data cable -(low cost Copper Clad Aluminium (CCA)) supplied and installed

Inferior cable product sold unmarked making it untraceable; misuse of trade marks common place

Government doesn't accept need for legislation. Encourages industry to self regulation



# Why we need change?

## Risk to Life

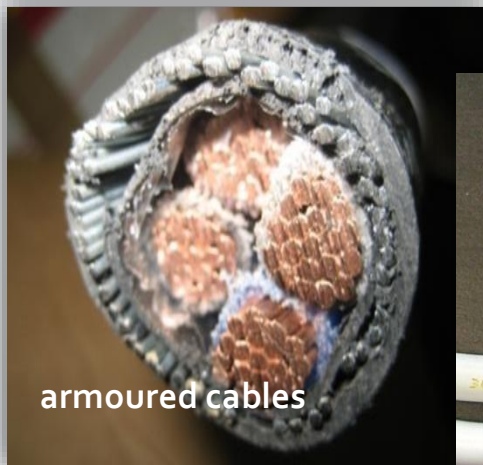
- Millions of metres of sub-standard cable already discovered
- Sub-standard cable found installed in houses, schools, hospitals and other public buildings
- Alarms that don't sound, sprinklers that don't activate, emergency light that doesn't operate - ALL risk lives

## Risk to livelihoods

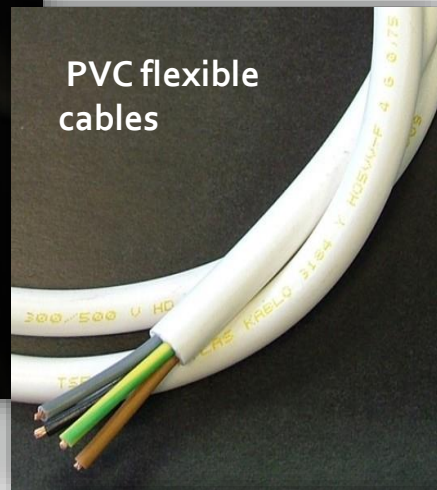
- Contractors are risking their livelihood by buying and installing non-approved cable
- A costly mistake when contractors must make good where sub-standard cable is installed

## Risk to UK business

- UK's domestic cable industry seen as centre of high-quality, safe cabling product
- sub-standard cable has already forced more than 30 UK producers out of business



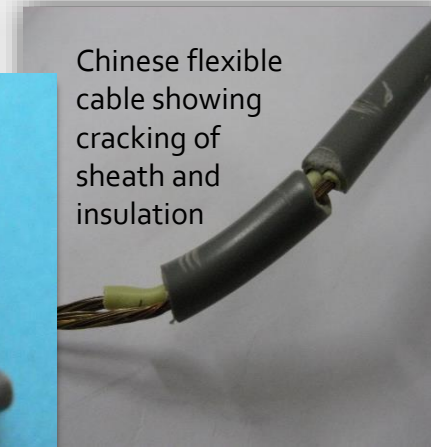
armoured cables



PVC flexible  
cables



Non-  
compliant  
cable,  
manufactured  
in China,  
removed from  
Wilko retailers



Chinese flexible  
cable showing  
cracking of  
sheath and  
insulation



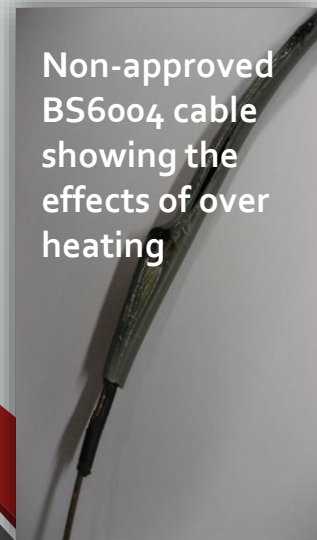
Fake fire  
resistant  
cables



Faulty  
cable



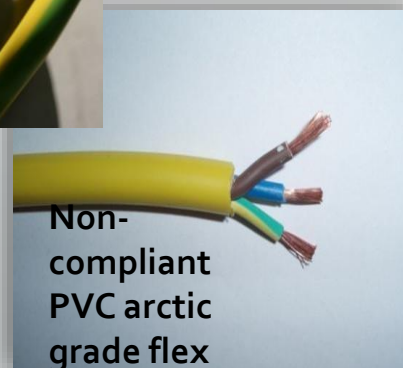
PVC arctic  
grade flex



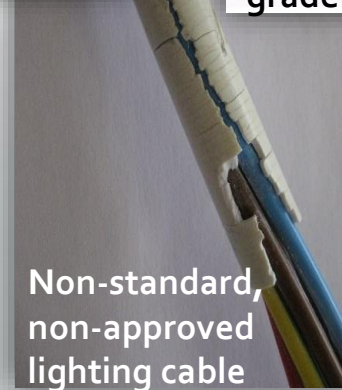
Non-approved  
BS6004 cable  
showing the  
effects of over  
heating



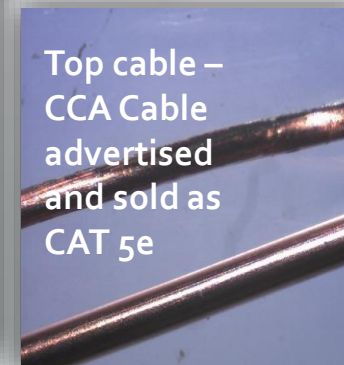
Faulty  
cable



Non-  
compliant  
PVC arctic  
grade flex



Non-standard,  
non-approved  
lighting cable



Top cable –  
CCA Cable  
advertised  
and sold as  
CAT 5e

# Hall of Shame



# ACI is looking to tip the balance

- Lobbying Government for Legislation to ensure cable installed in UK must be compliant with relevant standards
- Such cable must be independently third party approved
- legislative policy change to enable better control over cable imports at the point or place of entry.
- Managing our own testing of suspect cable
- Taking our work into the public arena- highlighting the health and safety issues around sub-standard cable



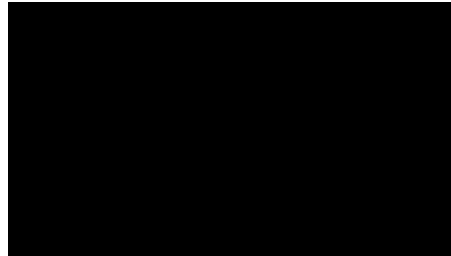
**Prysmian**

Frank Middle,

**Fire performance requirements  
for cables under the CPR.  
(Construction Products Regulation)**



Play CPR video.



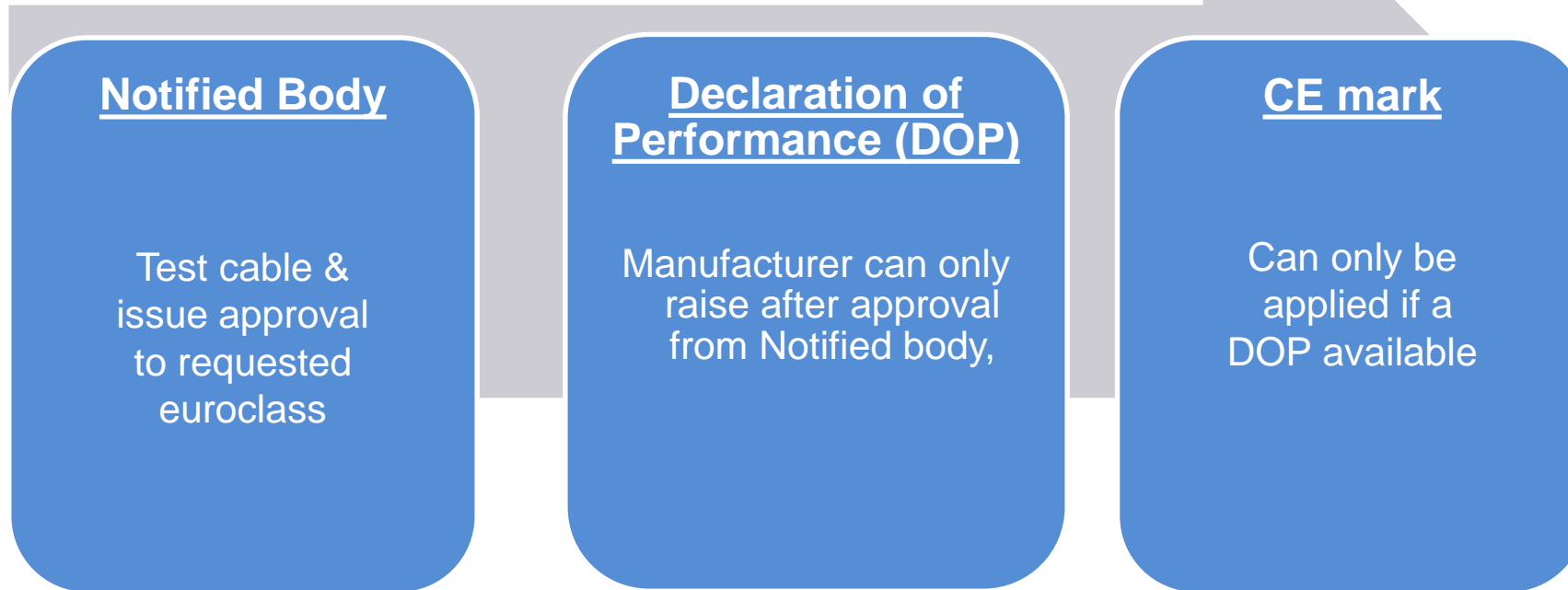


## What is CPR



- CPR for cables covers any cables intended to be incorporated in construction works in a permanent manner, including both buildings and civil engineering works.
- CPR does not in itself impose requirements on the level of performance of products. Setting safety levels remains a national responsibility
- It covers Safety in case of fire
  - Reaction to fire : EN50575: 2014
  - Resistance to fire : To follow
- Electrical and dimensional requirements still covered by product standards

## The Legal Compliance Process for Manufacturers and Importers



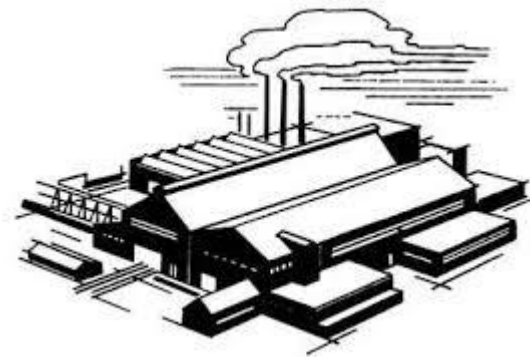
Note: If cable is imported from outside the EU the Importer takes on the legal responsibility of the manufacturer

## New mandatory obligations

- **Manufactures** – All cable manufacturers within the EU
- **Wholesalers and Distributors** – who buy and sell cable.
- **Importers** – anybody buying cable directly from outside of the EU

## Key mandatory obligations of the manufacturer

- Cable to be 3<sup>rd</sup> party tested for their reaction to fire
- Make a *declaration of performance(DOP)* with regard to reaction to fire
- Make available a DOP document
- Apply a CE mark to indicate the product is consistent with its DOP
- Ensure the product on the market is in accordance with the DOP
- Assume legal responsibility for the performance of this product to its declared performance



## Key mandatory obligations of the Wholesaler

These requirement applies to anybody in the supply chain who sell on cable already placed on the market. They must:-

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



## Key mandatory obligations of the Importer

These regulations apply to anybody importing cable from outside of the EU

- Ensure the cable has been formally tested and has a CE mark and a DOP.
- Mark on the packaging their name, registered trade name and their contact address
- Carry out sample testing of the products when appropriate, 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 manufacturer***



© Can Stock Photo - csp15340327

## The DOP and CE mark what to look for.

### The DOP must show

1. DOP number
2. Unique identification code of the product
3. Intended use
4. Manufacturer
5. Authorised representative:
6. Harmonised Standard
7. Notified body
6. System/s of AVCP:
7. Declared performance

### ▪ The CE mark 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 euroclass performance
- The European product standard
- A unique identification code
- Intended use of the product

It is illegal to buy and sell cables that do not comply with this.

## Key actions for Wholesalers from 1<sup>st</sup> July 2017

- Check that cable you are buying is CPR compliant
- Ask the manufacturer for copies of their DOP for the ranges you buy.
- Make sure the cable has CPR info on label
- Have a product withdrawal and recall system in place
- If you import cable from outside of the EU then refer to the CPR documentation to ensure you are in compliance with the law.





## **CPR 1 year on.**

Most suppliers are compliant for majority of products

Many have only declared the basic Eca level even for LSOH cables.

End users looking at levels of performance

Wiring regs give informative advice

Lots of DOP's contain errors and some may not be valid under law

Questions about content raised with EU commission

Hackitt and Brexit could change everything



# Cable & the 18<sup>th</sup> Edition of the wiring Regulations

**No major changes for cables.**

- Retain min BS EN 60332-1-2
- BS EN 60332-3 for escape routes & 60% light transmittance

Additional notes

- Cables must satisfy the requirements of the CPR in respect of their reaction to fire



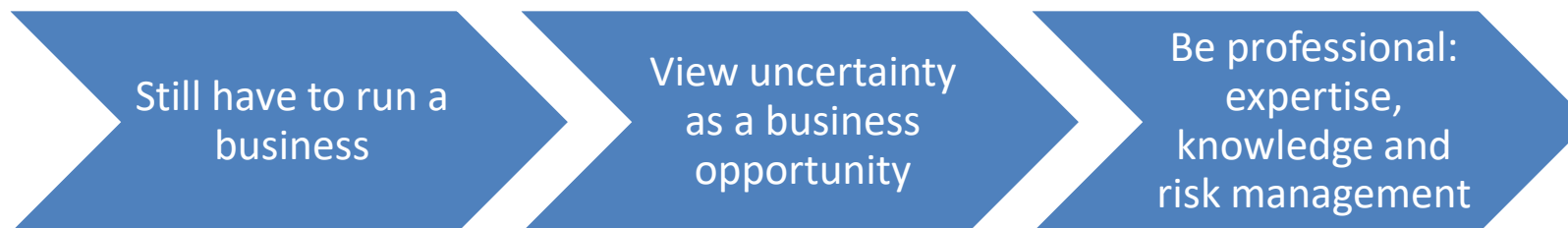
# Cables & Brexit

- CPR...
- CE LV directive
- Supply Chain Imports, Labour, Raw materials.
- British Standards
- Test Houses e.g. BASEC



# Summary

- Grenfell will change the way people specify and approve construction products
- Not all cable is fit for purpose
- CPR gives clarity of performance and cable origin
- Brexit's outcome is still uncertain.



# Thank you