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Construction Products Regulation (CPR) and cables – March 2018 - UK position

As widely predicted, the full “coming into effect” of CPR for cables from 1st July 2017 has thrown up many questions. Most important amongst these is the one asked by many specifiers and users “What class(es) of reaction to fire performance **must** we use?”

The correct answer is “There is currently no UK legal requirement for any specific class, therefore designers and specifiers are free to select any class so long as their decision reflects the demands of other applicable regulations.”

The reason for this is CPR, as a statutory regulation that automatically applies throughout the EU, requires manufacturers to place their products on the market in a specified manner. In particular they must prepare a Declaration of Performance (DoP) and apply CE Marking. Both of these must show the class of reaction to fire performance. For cables the CE marking must be on the labelling or equivalent.

The regulation does **not** define which class of reaction to fire performance is applicable to a particular installation. That is entirely the prerogative of the Member State. In UK that responsibility is vested in the Ministry of Housing, Communities and Local Government (MHCLG).

<https://www.gov.uk/government/organisations/ministry-of-housing-communities-and-local-government>

To date MHCLG has consistently said that it will not make any prescriptive legal requirement on reaction to fire for cables via amendments to The Building Regulations 2010. If it were to do so, then the obvious place for inclusion would be in Approved Document B, Volumes 1 and 2, for which MHCLG is responsible, though such Approved Documents themselves are described as “practical guidance” and include the statement “there is no obligation to adopt any particular solution contained in an Approved Document.” Thus the responsibility to make an appropriate choice rests with the marketplace, especially specifiers and end users.

Further voluntary guidance can come from such places as British Standards, some of which may be used as ways of demonstrating compliance with parts of the Building Regulations. In particular, the well-respected and long standing BS 7671 (the IET Wiring Regulations), may be used to demonstrate compliance with Part P (electrical safety – dwellings) of the Building Regulations.

(NOTE: Although the regulation of buildings in the devolved administrations of Scotland and Wales differ from that in England, the relationship with BS 7671 is similar. For non-dwellings, the Electricity at Work Regulations would apply, with which a similar relationship exists with BS 7671)

The current (17th edition) of BS 7671 pre-dates the introduction of CPR for cables but includes requirements for reaction to fire based on the long-established international test methods covering flame propagation and smoke release. The new (18th) edition is in its final stages and the technical content has been “signed off.” It will retain the existing reaction to fire requirements and will refer

in a non-prescriptive way to CPR and the classes of performance. In practice, because some of the CPR test methods correspond to pre-existing ones, the use of cables with a minimum class of E_{ca} is de-facto recognised.

Whilst BS 7671 covers the entire generality of installations up to and including 1 kV AC, some specialised areas may need extra guidance. In this respect another British Standard, BS 6701, has recently been amended. This standard relates to telecommunication cable systems and can thus embrace situations, e.g. vertical pathways (risers), where very large bundles of cables may be tightly installed in places and where fire safety or evacuation is key. The new amendment gives Class C_{ca} for what are defined as “installation cables”, and Class E_{ca} for all other telecommunication cables.

It must again be emphasised that both BS 7671 and BS 6701 are not legal requirements according to MHCLG and this has been confirmed. The user is fully entitled to find safe solutions for his installations without reference to these publications. but may then need to demonstrate compliance with the Building Regulations and the Electricity at Work Regulations by other means.

In advance of 1st July 2017 BCA had issued its Guide to Specifiers (Jan 2017), which gave certain minimum recommendations. In the light of the subsequent market experience following the “coming into effect”, and the developments with relevant standards, this is being updated. It will emphasise the principal content of this paper, namely that no class of reaction to fire, be it high or low, is in any way mandatory under current law.

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Disclaimer: All the above information reflects our understanding of the current position and is, to the best of our knowledge and belief, correct and reliable. In case of doubt, specifiers, users and installers should seek their own advice regarding the interpretation of the Construction Products Regulation, it being the primary regulatory source, and also the MHCLG.