cecapi
European Committee of Electrical Installation Equipment Manufacturers

CAPIEL
european coordinating committee of manufacturers of electrical switchgear and controlgear

26th October 2020

POSITION PAPER

CAPIEL-CECAPI statement on Draft Delegated Act on the classification of resistance to fire performance of construction products

About CAPIEL

CAPIEL is the European coordinating Committee for the Associations of Manufacturers of Switchgear and Controlgear equipments for industrial, commercial and similar use in the European Union, that work in the range of voltages until 1 kV a.c. of 1,5 kV d.c

About CECAPI

CECAPI is the European coordinating committee representing the Associations of Manufacturers of Electrical Installation Equipment within the member states of the European Union and the EFTA region. CECAPI was established in 1967.

The scope of CECAPI covers all the equipment and components for electrical installations for residential and commercial use. It includes, but is not limited to, components for electrical installations and appliances (such as plugs, sockets, boxes, switches, fuses), cable management systems, home and building electronic systems products, intercom and video-intercom, circuit breakers and residual current devices.

CAPIEL and CECAPI have analyzed the draft delegated Act on the review of the resistance to fire classification (AGF 03-2) in the regulatory framework for construction products, conducted a EU wide survey and has come to following position:

In chapter 6. *Products to be used within services*, it is written, among other products, that it applies to low voltage switchgear and controlgear.

6. Products to be used within services

Applies to	**power, control and communication cables; cable management systems providing support for cables; fire protective systems for cables and associated components; low voltage switchgear and controlgear**									
Standard	EN 13501-6 (**BG** suggests EN 50200 and prEN 50577)									
Classification:										
P	15	20	30	45	60	90	120	180		
Notes	—									

Applies to	**small diameter power, control and communication cables (<20 mm diameter and with conductor sizes ≤2.5 mm^2)**									
Standard	EN 13501-6 (**BG** suggests EN 50200 and prEN 50577)									
Classification:										
PH	15	20	30	45	60	90	120	180		
Notes	—									

Considering the definition of “low voltage switchgear and controlgear”:

“Electric equipment intended to be connected to an electric circuit for the purpose of carrying out one or more of the following functions: protection, control, isolation, switching (Based on internationally agreed definition IEV 826-16-03)”,

low voltage switchgear and controlgear are in the scope of CECAPI and CAPIEL

An EU wide market survey on fire resistance (fire resistance defined as the ability of a component or system to perform their intended functions under fire exposure) carried out by CECAPI, has shown that all questioned EU member states are using harmonized rules and requirements regarding low voltage switchgears and controlgears used for safety circuits.

The synthesis of the survey pointed out, amongst other things, that the requirements on fire resistance apply specifically to safety circuits:

- It is required that these safety circuits remain operational under fire exposure for a certain time to be able to supply for example smoke extractors and help the rescue services.
- According to installation rules, regulations and guidance implemented in a majority of European member states, switchgear and controlgear used to supply safety circuits have to be installed in a specific area taking into consideration fire

resistance aspects. Due to this specificity, low voltage switchgear and controlgear with resistance to fire are neither required nor useful and as such do not exist on the market. The specific area, which may be a room ensuring the relevant fire resistant criteria, is covered by the delegated act on CPR.

- As fire resistance is only required for products used within safety services, to avoid ambiguity, the title of chapter 6 should be amended as follows "*Products to be used within **safety** services".*

➔ Consequently, any type of switchgear and controlgear can be used, and free circulation of goods is ensured in Europe.

In conclusion CAPIEL and CECAPI call for:

- The deletion of low-voltage switchgear and controlgear from the table of chapter 6.
- The title of the chapter 6 should read: "Products within Safety Services".

➔ It would avoid the introduction of unnecessary and non-relevant additional requirements and rules that could complicate the free movement of products and hinder the objective of the EU single market.

CECAPI and CAPIEL are open to be active stakeholders on this topic.

26th October 2020