
POSITION PAPER

CECAPI and CAPIEL position on the new Construction Products Regulation (CPR) proposal

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. All activities are organized according to the rules of the Statutes and by laws. 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.

About CAPIEL

CAPIEL is the European Coordinating Committee of Manufacturers of Electrical Switchgear and Controlgear. The objective of CAPIEL is to promote and to support the common technical, industrial, economical, environmental and political interests of the European low voltage switchgear and controlgear industry (products, systems and assemblies). CAPIEL represents 9 national associations from 8 European countries. CAPIEL member associations include small, medium and large-sized companies representing more than 100,000 direct jobs across the EU. CAPIEL membership includes global players.

The evaluation of the CPR, opinions of the REFIT platform as well as Member States and stakeholders feedback pointed clearly to the shortcomings of the framework, hindering the functioning of the single market for construction products, and therefore failing to achieve the CPR's objectives

Therefore, CECAPI welcomes a revision of the CPR to improve the situation with a particular focus on two general objectives:

- (1) achieving a well-functioning single market for construction products to facilitate the free movement of construction products and
- (2) contributing to the objectives of a green and digital transition, particularly the modern, resource-efficient and competitive economy.

However, we request clarification regarding the scope of the proposal for revision of CPR (Proposal for a regulation - COM(2022)144).

The proposed scope and in particular the new definition of construction products and addition of Row 33 to Table 1 in Annex IV – “Construction Products not included in the product areas above” may lead to misinterpretation and confusion in the market.

CECAPI believes that it is not the intention of the EC to include within the scope of the new CPR electrical and electronic equipment installed in the electrical and control infrastructure that forms part of the construction work, for the following reasons:

- the single market for these products is functioning well, allowing for free movement as per the Low Voltage Directive (LVD – 2014/35/EU). EN standards for these products are harmonised, conformity assessment and market surveillance is working well. For LVD, Electromagnetic Compatibility Directive (EMCD – 2014/30/EU) & Radio Equipment Directive (RED – 2014/53/EU) products, CE marking has been in place for decades and the EC recently decided not to revise the LVD because it remains fit-for-purpose.
- the green and digital transition are already addressed through existing regulations (e.g. RoHS – 2014/863/EU, EPBD – 2018/844/EU, Ecodesign – 2009/125/EC, etc) and will be completed with the support of new dedicated regulations (ESPR, etc).

Considering these points, we request the following modifications to new Construction Products Regulation (CPR) proposal and specifically Article 2, as highlighted in yellow in the text below:

Article 2 Scope

3. This Regulation shall not apply to:

- (a) lifts subject to Directive 2014/33/EU of the European Parliament and of the Council, escalators and their components;
- (b) boilers, pipes, tanks and ancillaries and other products intended to be in contact with water for human consumption;
- (c) systems treating waste water;
- (d) sanitary appliances;
- (e) traffic signalling products.

(f) electrical and electronic equipment