

EUROPEAN ASSOCIATION OF PUMP MANUFACTURERS
ASSOCIATION EUROPÉENNE DES CONSTRUCTEURS DE POMPES
EUROPÄISCHE VEREINIGUNG DER PUMPENHERSTELLER



SECRETARIAT
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EUROPUMP - Position Paper

**on Pumps/Pump Units Construction the Product Regulation
(CPR)**

EUROPUMP Position Paper

Pumps/pump units and Construction Product Regulation (CPR)

The European Regulation No. 305/2011 (Construction Product Regulation, CPR) laying down harmonised conditions for the marketing of construction products has been applicable in all EU Member States since 01/07/2013. The Regulation replaces the EC Directive 89/106 (Construction product directive, CPD).

The EU regulation 305/2011 covers construction products which are defined in

Article 2- Definitions the EU Regulation 305/2011 as follows:

For the purposes of this Regulation the following definitions shall apply: 'construction product' means any product or kit which is produced and placed on the market for incorporation in a permanent manner in construction works or parts thereof and the performance of which has an effect on the performance of the construction works with respect to the basic requirements for construction works.*

EUROPUMP considers that pumps and pump units in general do not fit in the definition of a `construction product`* and therefore bear no obligation in regards to the CPR

- (1) Pumps are generally not incorporated in a permanent manner in construction works¹**
- (2) Pumps do not contribute to the performance of a construction work**
- (3) There is no harmonized Standard** for pumps**

Among the requirements this Regulation requires that if a `construction product` is covered by a harmonised Standard** or conforms to a European Technical Assessment it shall be accompanied by a Declaration of Performance and bear the CE-Marking².

Although EUROPUMP considers pumps not to enter the definition of a `construction product` some few exemptions have to be stated:

- Waste water lifting stations are covered by the harmonised Standards** EN 12050-1, EN 12050-2, EN 12050-3 and EN 12050-4. With respect to the provisions of the CPR these products shall be provided with a Declaration of Performance and EC Declaration of Conformity according the CPR.
- Some specific pump units for firefighting works may be following the future EN 12259-12, harmonised to the CPR. As soon as this harmonisation is officially, by being published in the Official Journal of the EU and after the transition period those pump units shall be provided with the Declaration of Performance and Declaration of Conformity

A different issue is the use of harmonized Standards which do not cover the product directly. One of these Standards is EN 1090-1:2009+A1:2011"Execution of steel structures and aluminium structures". This standard is used to build e.g. baseplates for pumps whereby the requirements according the CPR cannot be extended to the pump or pump unit.

A product will not become subject of an EU Regulation or EU Directive just by the application of a European Standard. Whether harmonised or not is of none significance for the product in sense of becoming subject of the EU Regulation or EU Directive this Standard once has been harmonised to.

¹Pumps are not a part of the construction work and can be easily removed e.g. from the building for repair or replacement, without any modification to the construction work

² Article 4 of EU Regulation 305/2011

NOTE: It is recommended not to list such standards as "applied to comply with the relevant EU Directives. Rely on those standards by mentioning "additional source of knowledge" separated from the other standards.

(3) Pumps for drinking water applications are not covered by such harmonised Standard** and therefore bear no obligation in regard to the EU Regulation 305/2011.

The materials in contact with drinking water of such pumps are compliant with the drinking water directive but never become a construction product. They will not follow the conformity procedure according 305/2011.

*A typical example is a permanently installed cladding-panel or window which performance, e.g. structural-safety, is labeled with the CE-Marking. This is done under the framework of a Declaration of Performance (DoP).

** harmonized Standard here means harmonized to the CPR

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