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ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL

Resources Based, Manufacturing and Consumer Goods Industries
Engineering Industries

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CE MARKING IN CORD SETS¹

Issue

When cord sets are sold as a stand-alone product, the manufacturer/authorised representative is required to mark this product with a CE marking (or failing that mark, in the packaging or the instruction manual) and undertake the responsibility to demonstrate that it is compliant.

However, very often a manufacturer of electrical appliances packs these cord sets with the electrical appliance and both articles are sold together in the same package. In this context, the question arose whether the cord set shall have a separate CE marking or whether it is enough to affix the CE marking on the electrical appliance (main article).

Legislation and guidelines

- Article 10 of LVD states that 'the CE marking shall be affixed to the electrical equipment or 'failing ' that, to the packaging...'
- Article R12 of the NLF Decision No 768/2008/EC (which can be used as guidance-tool to interpret existing directive), states that the CE marking shall be affixed visibly, legibly and indelibly to the product or to its data plate and where that is not possible or not warranted on account of the nature of the product, it shall be affixed to the packaging and to the accompanying documents, where the legislation concerned provides for such documents.
- LVD guidelines, Annex II, include the cord sets as an example of products within the scope of the LVD.

¹ Flexible cords for supply or interconnection, intended to be connected to the appliance by means of a suitable appliance coupler (EN 60335-1)

- Blue Guide states that in some cases, a combination of different products and parts designed or put together by the same person is considered as one finished product which, as such, has to comply with the directive. In particular, the manufacturer of the combination is responsible for selecting suitable products to make up the combination, for putting the combination together in such a way that it complies with the provisions of the directives concerned, and for fulfilling all the requirements of the directive in relation to the assembly, the EC declaration of conformity and CE marking.
- EMC guidelines states in point 3.4.1.1:

'A system which is only placed on the market as a whole need carry only one CE marking, which may be placed on any one of the constituent parts or units. However the manufacturer may, if he wishes, place additional CE marking on the other parts of the system. This could be appropriate, for example, if the user were able to easily separate the constituent parts and make use of them separately. Additional CE marking does not incur the need for separate conformity assessment or additional declarations of conformity for the constituent parts.'

'If the manufacturer places any part of the system on the market separately, the relevant provisions of the Directive, conformity assessment, documentation and CE marking, apply separately to that part or unit, in addition to the requirements for the system as a whole.'

Point 1.2.2 Combination of finished appliances (systems):

'A combination of several finished appliances which is made commercially available as a single functional unit intended for the end-user is considered to be apparatus. Such a system, within the sense of the EMC Directive, is combined, and/or designed and/or put together by the same person (the "manufacturer")...'

- Principle of proportionality.

Proposed approach

Following LVD Working Party and internal Commission discussions, the following approach is proposed:

When a cord set is sold together with another item that is also covered by the LVD, there is no need to CE mark the cord set, provided that the CE mark is affixed on the main article. In any case, the manufacturer/authorised representative of the main article shall be responsible to demonstrate that both items comply with the LVD.

In this respect, EMC Guidelines wording seems appropriate.