



European Materials Handling Federation

FEM Guidance on the application of the CPR to materials handling equipment

Annex I Application of the CPR to Intralogistic Systems

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Intralogistic systems represent a combination of several types of materials handling products, IT and control into one automated system. Examples of intralogistic systems include:

- Baggage transport systems at airports
- Automated storage systems in warehouses
- Automated dispatching systems



Intralogistic systems can comprise various types of equipment:

- Racks
- Conveyors
- Shuttles
- Stacker cranes

The analysis below applies to the hardware part of the systems.

Step 1: Are intralogistic systems a construction product as defined in Article 2, paragraph 1 of the CPR?

1) Product or kit

Intralogistic systems all include hardware, which is the “product part” of the system.

2) Produced or placed on the market

The CPR is only relevant if the equipment is produced in the EU or placed on the EU market.

3) For incorporation in a permanent manner in construction works or parts thereof

Intralogistic systems are found in various types of construction works: warehouses, distribution centres, logistic centres, manufacturing facilities, airports...

They are usually incorporated into these construction works insofar as they are fixed to the building (ground and/or walls) usually with fasteners. For economic reasons, intralogistic systems are normally meant to stay permanently where they are installed. However, intralogistic systems may be dismantled or replaced without affecting the performance of construction works, or requiring a construction operation.

4) The performance of which has an effect on the performance of the construction works with respect to the basic requirements for construction works

Out of all the basic requirements for construction works, only “mechanical resistance and stability” is relevant.

The incorporation of intralogistic systems into construction works is limited to the mounting of equipment on the floor, walls or ceilings, the building thus supporting the system. In the case of new buildings, in many cases, this incorporation takes place after the building works (or at least the structural parts) are completed. However, many intralogistic systems are incorporated into existing buildings/structures. Finally, intralogistic systems can be removed from a given installation with no impact on the building, which can then be used for another purpose.

It is therefore concluded that intralogistic systems do not have a structural function in relation to the construction work. As a result, their failure does not affect the construction work’s mechanical resistance and stability.

Summary

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|---|-----|
| Product or kit | Yes |
| Produced in or placed on the market | Yes |
| For incorporation in a permanent manner in construction works or parts thereof | No |
| The performance of which has an effect on the performance of the construction works with respect to the basic requirements for construction works | No |

Conclusion

Intralogistic systems are a product produced in or placed on the market, but are not intended to be incorporated in a permanent manner into construction works or parts thereof. Indeed, their dismantling or replacement does not affect the performance of the construction work or require a construction operation. In addition, the performance of intralogistic systems has no effect on the performance of the construction works with regard to their mechanical resistance and stability.

Consequently, intralogistic systems cannot be considered as a construction product and are therefore not affected by the Construction Products Regulation.

Concerning the specific case of rack-clad buildings (also called rack-clad structures), they are within the scope of the Construction Products Regulation. Therefore a declaration of performance and CE marking are required for any of the construction products which are covered by a harmonised European standard (hEN) or conform to a European Technical Assessment (ETA). It is recommended that intralogistic systems manufacturers carefully check the declaration of performance accompanying rack-clad buildings, which should be provided by their suppliers (in paper form, by electronic means or via a website).

This publication is only for guidance and gives an overview of the assessment of the application of the Construction Products Regulation (305/2011/EU) to materials handling, lifting and storage equipment. It shall not be considered as a binding interpretation of the existing legal framework. It does not claim to cover all aspects of the matter, nor does it reflect all legal aspects in detail. It is not meant to, and cannot, replace knowledge of the relevant directives, laws and regulations. Furthermore the specific characteristics of the individual products and the various possible applications must be taken into account. This is why, apart from the assessments and procedures addressed in this guide, many other scenarios may apply. Manufacturers’ instructions and manuals must always be respected.