



**ASPEN
PUMPS
GROUP**



Declaration of Regulatory Compliance

Declaration Purpose

This declaration confirms the regulatory compliance status of the **Pipelounge** product line in relation to applicable UK and EU legislation, including CE marking, UKCA marking, and general product safety obligations.

1. Product Description and Scope

Pipelounge is an engineered multi-pipe support system developed to cradle, cushion, and allow for the controlled expansion and contraction of insulated pipework across building and industrial installations.

It is designed for use in mechanical and building services applications, supporting multiple insulated pipes while reducing strain and accommodating movement due to thermal expansion and contraction.

The product is a **passive component** and contains **no powered, electrical, pressurised, or hazardous elements**.

2. CE Marking Assessment

An independent regulatory assessment has been undertaken to determine applicability under CE marking directives. The findings are summarised below:

Directive / Regulation	Applicability	Reasoning
Machinery Directive	N/A	No powered moving parts
Low Voltage Directive	N/A	No electrical circuits
Medical Devices Directive	N/A	Not a medical device
PPE Directive	N/A	Not personal protective equipment
Construction Products Regulation (CPR)	Discussed separately below	Installed within construction works
Pressure Equipment Directive	N/A	No pressurised parts
Simple Pressure Vessels Directive	N/A	No pressurised parts
RoHS	N/A	No electronic/electrical content
ATEX Directive	N/A	Not for explosive atmospheres
Toy Directive	N/A	Not a toy
Radio Equipment Directive	N/A	No wireless communication capability
Recreational Craft Directive	N/A	Not applicable
Implantable Medical Devices Directive	N/A	Not applicable
Gas Appliances Directive	N/A	Does not use flammable gas
Lifts Directive	N/A	Not applicable
Measuring Instruments Directive	N/A	Not a measuring device
ECO Design Directive	N/A	No power source used



3. Construction Products Regulation (CPR 305/2011/EU)

Scope:

The CPR applies to products intended to be permanently incorporated into construction works where product performance may affect the works' overall performance.

Assessment Outcome:

Pipelounge qualifies as a *construction product* under the CPR. However, CE marking under the CPR is mandatory only when:

- A **harmonised European standard (hEN)** exists, or
- A **European Technical Assessment (ETA)** is available.

Following review:

- No harmonised standard applies, and
- No suitable ETA route is available.

Conclusion:

Pipelounge **must not and cannot** be CE marked, as no lawful conformity route exists under the CPR.

A voluntary CE mark via EOTA/ETA was also considered but is **not available** for this product category.

4. UKCA Marking

The UKCA system currently mirrors CE requirements in this category.

As no harmonised conformity route applies under CPR:

- Pipelounge **does not require** and **cannot bear** UKCA marking.

5. General Product Safety Regulations (GPSR)

Although CE/UKCA marks do not apply, Pipelounge remains subject to the General Product Safety Regulations for placement on UK and EU markets.

To ensure compliance:

- A comprehensive internal **safety and risk assessment** has been completed.
- Full **technical documentation** exists, detailing design, materials, and risk mitigation.
- For EU distribution, an **EU-based Authorised Representative** has been appointed, with contact details provided with the product.

Summary

- No applicable harmonised standards or European directives exist for this product category.
- Pipelounge is therefore **not within the scope** of CE or UKCA conformity assessment and **shall not bear** these marks.
- Installers and specifiers remain responsible for ensuring the product's suitability for its intended application and compliance with relevant fire safety and building regulations.
- The product may also be installed with a **strut support** for certain applications.

Signed By



Name

Walter Martin

Position

Technical Director

Date

24/10/2025

