



TO: Mr Mikkeli Tapani & Mr Katsarakis Georgios, Staff Unit C1 DG GROW

CC: Chairman CEN/TC 33, Convenor CEN/TC 33/WG 1

Revision of EN 14351-1 and calculations on made-to-measure products

Dear Sirs,

We kindly question Unit C1 on the way the assessment of performance for made-to-measure products in scope of EN 14351-1, representing more than 90%¹ of all the products in scope of the standard that are sold in the internal market, will have to comply with simple calculations and the use of tabulated values.

Based on EC decision [2011/246/EC](#) in conjunction with [\(EU\) No 568/2014](#) amending CPR Annex V, all essential characteristics for which calculation or tabulated values are made available according to the referenced normative standards in the harmonized standard EN 14351-1, the involvement of a third party, a Notified Body, is necessary for the assessment.

There is an enormous set of parameters that is influencing the determination of some characteristics when performing a calculation or using tabulated values. For example, when calculating products' characteristic thermal transmittance², important parameters include unlimited different geometries for fixed and openable members, infill properties, various component combinations, etc within each product family. For practical reasons manufacturers of made-to-measure windows usually determine the performance of characteristics of each product before placing the product on the market by using simple calculations or tabulated values where possible. For each essential characteristic to be treated as above of each made-to-measure product placed on the market, it is unsustainable and, far too time and money consuming (as a percentage of the value of the product sold) for the entire sector to dedicate resources for validating the performance in collaboration by Notified Bodies.

This is why the current harmonised version of EN 14351-1:2006+A2:2016 contains the following paragraph in '**Annex ZA.2 Procedure(s) for the attestation of conformity of products**':

Non-series production³ – Where a manufacturer produces an individual and non-series product(s) he may be permitted to declare conformity for certain characteristics (characteristics which do not have a special impact on health and safety) without the involvement of a notified body, see superscript x in Tables ZA.3a, ZA.3b and ZA.3c.

As above, this is reflected in Tables ZA.3a, ZA.3b and ZA.3c of the standard with the following footnote 'x' in each table:

for non-series products these initial type tests (and/or the use of tabulated values and/or calculations) may be performed by the manufacturer

¹ Approximately 90 million units sold in the internal market each year by SMEs.

² The example of thermal transmittance is the most representative, as the declaration of this essential characteristic is directly or indirectly required by national law which is related to the implementation of the EPBD 2010/31/EU across the European Union.

³ The meaning of "Non-series production" here is different to the one that is given in the CPR. The sector used this expression 5 years before the publication of the CPR, to describe "made-to-measure" products.



For the same reason, in CEN Mandate M/108 for curtain walling kits, which do not differ in their market approach from that for products covered by CEN Mandate M/101, the European Commission has considered this issue more appropriately. While the table in clause 2 '**Systems of attestation of conformity**' shows that all characteristics fall under AVCP systems 1 and/or 3, the tasks for third parties is limited in clause 3.2 to product characteristics dealing only with 'health and safety':

3.2 For products under systems 1 and 3, regarding the initial type testing of the product (to be required by the manufacturer in case of system 3) [see Annex III.1.a) of the CPD], the task for the approved laboratory will be limited to the assessment of the following characteristics:

- **Euroclass characteristics for reaction to fire** as indicated in the Commission Decision 94/611/EC (when relevant)
- **fire resistance**
- **fire propagation** (to upper levels) (when relevant)
- **resistance to its own dead load**
- **windload resistance**
- **impact resistance/safe breakage**
- **resistance to live horizontal loads at sill level**
- **thermal shock resistance**

The signatories to this letter are all deeply involved in the revision of EN 14351-1. We have managed to resolve a large number of issues with the standard, making a significant step forward to ensure its content complies with the provisions of the CPR, as well as updating it to reflect the evolution of the market over the last fifteen years.

The majority of the members of each association has highlighted that this issue for made-to-measure products is very important to them and that is the reason why they are asking to retain the present option. Discussions have taken place in the related Groups of CEN/TC 33 where all undersigned associations expressed this viewpoint. A solution without the support of the European Commission will hardly be found and therefore we highly appreciate your involvement on the topic.

It is essential to note that this crucial topic finds all European fenestration-related federations united, as the issue is of highest concern and needs an urgent solution before launching the CEN Enquiry for prEN 14351-1.

On behalf of the above mentioned European fenestration-related federations:

Charlotte Röber	European PVC Profiles and related Building Products Association EPPA ivzw	
Pavlos Vatavalis	European Aluminium	
Frank Koos	EuroWindow AISBL	
Justin Furness	FAECF - Federation of European Window and Curtain Walling Manufacturers' Associations	
Samuele Broglio	Small Business Standards	