



## **Product inherent requirements of windows, doorsets and rooflights according to draft new CPR, Annex I, Part B, C and D**

In the meeting of SG#4 on 7<sup>th</sup> November 2023 the EC referred to the annexes of the new CPR (in particular **Annex I**). The experts were invited to send feedback about possible product inherent safety requirements to be considered until 15<sup>th</sup> December 2023.

The following feedback from EuroWindowor for windows (Family III), doorsets (Family I) and rooflights (Family V) is based on the CPR Proposal COM(2022)144final dated 30.3.2022.

### **1 Annex I, Part B (Requirements ensuring the appropriate functioning and performance of products)**

The items under 1) (Products shall be designed and manufactured in such a way...) can be covered through a combination of targeted informative intended uses via modular approach as suggested by EuroWindowor (see attached EuroWindowor input to combination of intended uses for simplification of DoP and CE-marking for CPR Acquis SG#4 dated 24<sup>th</sup> October 2023) and identification of those parameters critical to performance which can be requested to CEN to define in updated harmonized technical specification as part of requirements for FPC.

The items under 2) (Product requirements referred to in point 1 shall be specified in harmonised technical specifications) are generally either covered by current installation and maintenance instructions or not relevant. There should be no duplication of information.

### **2 Annex I, Part C (Inherent product requirements)**

For manually operated products in Family I, III and V no inherent product safety risks are known. Power operated products of these families are already sufficiently covered in terms of product safety risk by Machinery Regulation (MR). “Risks of software manipulation” could be relevant for products declaring burglary resistance if digital lock is used but this is expected to be covered by the Cyber Resilience Act. There is no need to ask for inherent product safety requirements.

Regarding inherent product environmental requirements EuroWindowor recommend to await the results of the work in SG ENV before it is evaluated if any further rules or special limitations are needed for Family I, III and V products.

### **3 Annex I, Part D (Product information requirements)**

Of the items under 1.2) (Product description) the intended use and condition of use can be combined if the modular approach for intended uses are followed (see attached EuroWindowor input). The intended users are not seen as relevant because all users can operate Family I, III and V products.

As windows and doorsets are often made to measure nominal drawings should not be required as part of product information. Furthermore, these drawings would often contain confidential business critical information which should not be shared outside the company.

The information to be given regarding main materials, should be limited to the main materials used for frame, sash/casement, infill and door leaf.

EuroWindowor has concerns about 1.2 (d) ‘estimated average and minimum service life span for intended use (durability)’ as such an information depends from the user and could give rise to legal disputes in cases where a products service life ends out being e.g. 38 and not 40 years as declared – who bears the burden of proof in such cases? There could be many reasons for such a deviation, and it will be very difficult for not only the manufacturer but also the customer to gather sufficient and reliable documentation to support their case.

The intention/role of ‘key parts’ are not perfectly clear to EuroWindowor, and therefore no input on this is given here as long as there is no further clarification.

To the information required in 1.3) (Transport, installation, maintenance, deconstruction and demolition rules) we see for a)-c) that all information will be contained in installation (if the product is not installed by the manufacturer) and maintenance instructions and there is no reason to duplicate this.

The information in 1.3) d)-f) are not seen to be relevant for products in Family I, III and V apart from what will already be covered for power operated products due to the obligations of MR, EMC etc.

The contact details in 1.4) a) should be sufficient to also cover the information required in 1.4) b) (i) whereas the information in 1.4) b) (ii) and (iii) are seen as not relevant for products in Family I, III and V. The same applies for the information required in 1.5).

The manufacturers are mainly SME with a limited number of employees having usually only a single point of contact.

EuroWindoor sees the relevancy of the information required in 1.6) (Rules or recommendations for repair, deconstruction, reuse, remanufacturing, recycling or safe deposit) but to which extend and in which format will depend on the outcome of the work by SG ENV. We therefore recommend to await this work before taking product specific decisions on this item.

In general, EuroWindoor recommends to only demand information from the manufacturer about the product which is needed by the customer and only when specified in the standardisation request as it might be different for each product family.

It should be possible to provide the information for download on the manufacturer's website, because of the comprehensive amount of documentation which is often the same for different products of similar type. The link for the information can be provided in the DoP by the manufacturer.

EuroWindoor would highly appreciate the Commission to consider our feedback and we remain available for further discussions.

\*\*\*

**About EuroWindoor AISBL** – EuroWindoor AISBL was founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 20 national associations speak for European window, door and facade manufacturers that are in direct contact with consumers, and thereby having large insights on consumers' demands and expectations. We are at the forefront interacting with dealers, installers and consumers buying windows and doors, and the companies behind the associations cover selling all over Europe.

EuroWindoor AISBL  
Schuman Business Center, 40, Rue Breydel, 1040 Bruxelles / Belgium  
or  
Walter-Kolb-Str. 1-7, 60594 Frankfurt am Main / Germany  
Internet: [www.EuroWindoor.eu](http://www.EuroWindoor.eu)