

## **Open topics in the Technical Acquis process for windows and doors**

EuroWindoor appreciates to be involved in the Subgroup 4 of the Technical Acquis process of the CPR for windows and doors. EuroWindoor is eager to support the implementation of the CPR and contributed during the ongoing process already numerous comments and proposals. EuroWindoor has noticed that the process is much more difficult than expected, because of the amount of the different products in the family “Doors, windows, shutters, gates and related building hardware” as well as the complexity of made-to-measure products like windows. To address this wide variety in the Standardisation Request (RS) seriously, it takes more time than expected in the beginning. EuroWindoor would like to take this opportunity to point out different important topics that must be addressed before the final draft RS is released and asks the Member States to give the EU Commission more time for proper clarification.

### **Open-ended performance classes**

The CPR requires that all performances expressed as classes in the DoP shall be open-ended and allow any product performance. At the same time all classes are deemed to only contain one value due to the later digitalization for DPP purposes. To fulfil both requirements a completely new way of thinking classes are required which at the same time will not change all the existing classification systems available that have been working well for years and for some are also adopted into national building legislations across EU. On top a very large number of standards would require formal revision which would take several years unless the Commission finds a way to mandate CEN to perform these modifications without reopening the full standards for revision. To respect the requirement of having only dated references in the harmonized technical specifications all these standards need to be updated and published before finalization of the harmonized technical specification.

### **Scope of Products and List of Characteristics**

Many experts from the Sub-Group 4 on Doors and Windows were pointing at the fact that critical questions regarding the scope of the actual draft Request for Standardisation remain open and unresolved.

Several issues related to the inclusion of product categories (e.g. continuous rooflights) and of certain characteristics (naming of certain characteristics, reduced list for blinds and shutters, resistance to fire, strength of bonded glazing,...) have not been addressed to meet MS and market requirements and needs to be revisited.

### **Reference Service Life (RSL)**

The actual draft Request for Standardisation states that the Commission shall develop guidelines to harmonize the procedure for defining the RSL in the different c-PCR standards. The entire construction sector is awaiting these guidelines to ensure coherent implementation and avoid unfair competition across or within product families.

### **Range of validity**

The latest draft Request for Standardisation does not address the range of direct application of performances for the DoPC, especially regarding sizes and also the large number of varying configurations which are increasing the amount of product types for each individual project: manufacturers need to have the assurance that a performance established via measurement, calculation or tabulated method will be acceptable for a certain range of product sizes and not specific for the assessed sample (otherwise the number of required assessments becomes infinite). Today this topic is handled directly in the harmonized product standard which would also be a suggested way forward in the future, but it has to be secured that the ranges of validity then developed will be allowed and accepted by HAS consultants and in the end by MS and EC. If it is needed to have some reference or text in the standardization request which delegate this task to the standardizers, such a text needs to be developed.

### **Split characteristics for different assessment methods**

Many product performances can be established via different assessment methods (e.g. calculation, measurement and/or tabulated values) to allow manufacturers to choose a cost-optimal approach and to secure the market access for SME with limited resources. Industry practices and assessment methods are reliable on this flexible approach and works under the assumption that simpler but less accurate methodologies should be conservative.

The latest draft of the Request for Standardisation suggests splitting some characteristics into 2 or 3 separate ones depending on the assessment method. This would unfortunately lead to risking that Member States start regulated both values, de-facto obliging manufacturers to use all evaluation methods (at the expense of cost optimality, if not even feasibility). Probably Member States accept only a specific assessment method or are forced to request a specific characteristic including the assessment method which could be seen as a barrier to trade for manufacturers to deliver to different EU Member States, because of additional costly assessment and time delay. If DoPC will include up to 3 slightly different values for the same characteristic it could lead to confusion in the market.

### **AVS level for new characteristics**

Some characteristics – such as dimensions for ventilation, behavior between different climates and manual operating forces are all today handled as voluntary characteristics and therefore assessed by the manufacturer (equals AVS4). It would be valuable with some discussions also on SG#4 level what would be the relevant AVS level for these characteristics going forward.

### **Characteristics with multiple values**

Some characteristics – like Resistance to Fire – are expressed as multiple performances (e.g. combination of integrity and/or insulation and time) which are all accurate and correct. The value to be used for compliance with regulatory needs depends on the real site conditions of the building. Manufacturers need to make sure this remains feasible in the future and that those values are for instance split into different lines/rows.

### **Hardware section currently empty**

So far, the wider group of SG#4 has not had the opportunity to see what the expected delivery will be related to hardware. As the outcome of this is of particular relevance also for some of the other products in the RS. It is essential that 1) hardware will become part of the draft RS and 2) that it is ensured no unintended gaps are created between the hardware product group and the other product groups covered by the RS – especially for fire doors.

### **Technical details relating to FPC missing**

Due to the very tight schedule and limited guidance on expected delivery all the tables in the actual draft SR under Annex II, Part B, section c) are currently empty. It is unclear what will happen if these tables are left empty and at which stage and whom will be requested to give input.

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**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 19 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.