

EuroWindoor position on the draft delegated act establishing the applicable assessment and verification systems (AVS) for product families and categories under CPR 2024

On 23 July 2025, the European Commission sent to the Member States (MS) the draft delegated act establishing the applicable assessment and verification systems (AVS) for product families and categories under the revised EU Construction Products Regulation (EU) 2024/3110. Member States are invited to comment until 15 October 2025.

EuroWindoor welcomes the opportunity to comment but wishes to express **serious concerns** regarding the proposed **AVS for windows (including roof windows), doors and curtain walling**, as set out in **Annex III, Table 1**.

The current proposal is **not practicable** and risks creating significant burdens for industry. This is because the AVS is linked solely to the intended use of a product, rather than to each essential characteristic, which contradicts established good practice and, in many cases, cannot be implemented efficiently. Article 10 (1) and (2) of the new CPR also specify AVS levels differentiated in relation to its essential characteristics and product requirements.

1. Proposed AVS allocations in the draft

- **Windows and doors:** AVS 1 for *all characteristics* when intended for fire/smoke compartmentation or escape routes; AVS 3 for *all characteristics* of other windows and doors.
- **Roof windows:** AVS 3 for all characteristics for intended use as “roofings”.
- **Curtain wall kits** (including structural sealant glazing/ bonded glazing): AVS 3 for all characteristics when intended for use in external walls and roofs.
- **Structural sealant glazing kits** (bonded glazing kits): AVS 1 for kits without devices to reduce the risk in case of sealant failure and AVS 2+ with such devices.

2. Why AVS must be assigned to individual essential characteristics

EuroWindoor supports the approach previously used in the old mandates M/101, M/122 and M/108 and re-introduced by **CEN/TC 33** during consultations on a new Standardisation Request in 2018 (document CEN/TC33 N3663), which was accepted by the Commission at the time: AVS should be allocated **per essential characteristic**, not per intended use.

The main reasons are:

a) Limiting AVS 1 to relevant fire-related characteristics

Products intended for fire/smoke compartmentation, like a fire door must also meet requirements such as sound insulation, thermal insulation and clear opening height. While AVS 1 may be justified for fire resistance, it is disproportionate to apply it to all unrelated characteristics, which under current practice are linked to lower AVS levels.

b) Characteristics determined only at the time of placing on the market

Certain characteristics (e.g. clear opening height and width, dimensions for real size U-value calculation and ventilation area at open position) are specific to each product and are not determined through type testing. These should fall under **AVS 4**, as requiring a notified body for each unique product would be impractical and excessively costly.

Another example is the characteristic ability to release (to open) for an escape route door. While the performance of the emergency exit building hardware is tested and documented by hardware suppliers under AVS 1, the door manufacturer can only secure and check by opening the correct functioning of an escape route door after the assembly of the hardware on site under AVS 4.

c) Avoiding bottlenecks for new characteristics

Some characteristics – such as ventilation area at open position, climate-related deformation and manual operating forces – have so far been **voluntary** and assessed by the manufacturer (equal

AVS 4). Imposing AVS 3 for all such new requirements would create a sudden surge in testing demand that notified bodies could not meet, leading to delays, cost increases and unnecessary disruption.

d) Special test facilities for anti-violation characteristics

Essential characteristics such as bullet resistance and explosion resistance are typically tested by specialised official bodies (often linked to police or military), which are unlikely to undergo the normal notification process. Tests are often tailored to specific customer requirements and cannot always be standardised. These too should be **AVS 4**.

e) Use of simplified assessment methods

Standards such as EN 14351-1 include simplified methods (tabulated values, basic calculations) for certain characteristics, especially for complex products with frequently changing configurations. As these methods are easy to verify and pose no risk to health, environment or safety, they should be linked to **AVS 4**, consistent with the cost-reduction and simplification goals stated in recital (7) of the revised CPR.

f) Proven success of differentiated AVS

Under current CPR harmonised product standards for windows and doors as well as for curtain walling, already assigned different AVS levels to specific characteristics. This system is well established, functions smoothly and has been accepted by legislators without reported problems.

3. Conclusion and recommendation

A blanket assignment of AVS levels based solely on intended use is unworkable and will impose unnecessary costs and administrative burdens.

Instead, AVS should be linked to **each essential characteristic**, as per the model in CEN/TC33 N3663 and as already proposed so for product family 30 for glass.

If the current Annex III, Table 1 format is retained, EuroWindoor recommends replacing the word "all" in the column "essential characteristics and product requirements" with a **list of the specific characteristics** corresponding to the AVS in question.

EuroWindoor stands ready to provide detailed proposals and examples to support a balanced and implementable AVS allocation.

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.