

EuroWindoor comments to the draft delegated regulation on resistance to fire performance classes

EuroWindoor is pleased to contribute to the public consultation on the draft delegated regulation on resistance to fire performance classes. While EuroWindoor supports the initiative to set out resistance to fire performance classes under Regulation (EU) 2024/3110, to ensure harmonised declaration of this essential characteristic and maintain regulatory continuity with Regulation (EU) No 305/2011, it has noted an issue with class EI-M and its applicability to fixed windows.

In the last revision of the delegated regulation for defining classes related to resistance to fire performance of construction products a yearlong gap related to fixed windows was closed by adding these to Table 4.1 which originally was for partitions. However, not all of the classes existing for partitions are relevant to windows. Windows, neither openable nor fixed will be intended to withstand impacts arising from the failure of other components or objects exposed to fire and therefore class EI-M will not be relevant for windows.

The impact test described for “M” is a 200 kg impactor dropped from 1.5 m against a product that has been exposed to fire, and in comparison, the impactor used for impact resistance of windows according to EN 13049 is 50 kg and drop height is less than 1 m against a full functioning window. The class EI-M is also not applicable to other types of windows, like openable and fixed tested as part of a window configuration consisting of both openable and fixed, included in Table 4.10.

EuroWindoor therefore suggests adding a note to Table 4.1 stating “Class EI-M is not applicable for fixed windows”.

Note: we like to point out that in our understanding the term “fixed windows” shall also include “fixed lights” according to EN 12519:2019 No. 2.15.

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.