

## **EuroWindowor position on the draft delegated act establishing the applicable assessment and verification systems (AVS) for product families and categories under CPR (December 2025)**

On 10 December 2025, the European Commission opened a feedback period about 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. The draft act is open for feedback over the Christmas season and New Year until 7 January 2026.

EuroWindowor welcomes the modification since draft version from July that the AVS for windows (including roof windows) and pedestrian doors are linked to essential characteristics instead of intended use of a product. Nevertheless, we do still have **some concerns remaining**. The previous EuroWindowor position from August 2025 can be found here ([link](#)).

### **Consistent Allocation of AVS Levels to avoid Overlaps between Product Categories**

The industry strongly supports the principle of allocating AVS levels to essential characteristics rather than to intended uses, as this approach increases clarity and consistency across product categories. It would therefore be beneficial to apply this principle consistently in the context of product category 10 for natural smoke and heat exhaust ventilation (NSHEV), in order to avoid potential overlaps with product categories 2 and 22 covering windows, roof windows and rooflights.

While it is acknowledged that the acquis process for product category 10 is still at an early stage, it remains important to keep this objective in mind as work progresses. From an industry perspective, it would be appropriate to limit product category 10 to those essential characteristics that are specific to Natural Smoke and Heat Exhaust Ventilation, with the corresponding AVS level applied only to these unique characteristics. Other characteristics, which are common with windows, roof windows or rooflights, could then continue to be addressed under the respective product categories, ensuring coherence and avoiding duplication.

### **Review of selected AVS Allocations for specific Characteristics**

The industry recognises that the proposed AVS allocations are largely based on the AVCP levels currently in place. However, some essential characteristics included in the new framework have not previously been part of CE marking and therefore fall outside the existing AVCP system. In practice, these characteristics have so far been managed under manufacturer responsibility.

Therefore, we are of the opinion that some characteristics should be reconsidered and assigned to AVS 4 for several reasons:

- Characteristics determined only at the delivery of the product  
Certain characteristics (e.g. manual operating forces) are specific to each product and are not determined through type testing.
- Avoiding bottlenecks for new characteristics  
Some characteristics (e.g. climate-related deformation) have so far been voluntary (equal to AVS 4) and create a sudden surge in testing demand that notified bodies could not meet.
- Use of simplified assessment methods  
The product standards for window and pedestrian doors (EN 14351) defines today very simple assessment of some characteristics by tabulated values a simple calculation.
- Forwarding of component characteristics  
Sometimes with the DoPC for windows and pedestrian doors performance of the component (e.g. g-value and light transmittance of glass) has to be forwarded. In these cases, AVS 4 should be sufficient.

For windows (including roof windows) and pedestrian doorsets, this applies for example to characteristics such as manual operating forces, climate-related deformation and bullet and explosion resistance. For rooflights, similar considerations apply to manual operating forces and durability. In these cases, a careful assessment of the necessity and proportionality of introducing higher AVS levels could be beneficial.

In addition, for certain products such as roof windows and curtain walling, some characteristics already covered by CE marking are proposed to move to a different AVS level. For roof windows, this concerns snow and permanent load, which under mandate M/122 was subject to AVCP system 4 and is now foreseen under AVS 3. As the declared performance in this case is largely derived from glazing-related information, maintaining a lower AVS level could be considered appropriate and consistent with established practice.

Overall, a targeted review of these specific allocations could help ensure that AVS levels remain proportionate, risk-based and aligned with both product performance realities and existing industry experience.

A list of detailed EuroWindoor comments on the draft delegated act on AVS can be found here ([link](#)).

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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 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.