Joint position on the use of verified software tools to assess product performance to implement the revised EU Construction Products Regulation (EU 2024/3110) in the Window and Door Sector

1 Introduction

From the perspective of the industry, the revision of the EU Construction Products Regulation (EU 2024/3110) pursues important and explicitly supported objectives: further harmonisation of the European internal market, increased transparency along the value chain, and the consistent integration of sustainability, climate protection and resource efficiency in the construction sector. In particular, the extension of the basic requirements for construction works to include environmental criteria such as embodied energy, recyclability and environmental performance under AVS 3+ is expressly welcomed.

The windows and doors sector is ready to actively contribute to the achievement of these objectives. At the same time, an analysis of the current implementation mechanisms – the Digital Product Passport (DPP), the extended Declaration of Performance (DoPC) and the systems for Assessment and Verification Systems (AVS) – show that in certain areas there remains a tension between regulatory ambition and the practical reality of a sector characterised by craft-based production, SMEs and project-specific (custom-made) manufacturing. For example, only AVS 3+ allows the use of software tools to assess the performance for environmental characteristics and no other performance related essential characteristics. Against this background, this paper is intended as a constructive contribution to the dialogue with the competent regulators, with the aim of jointly developing practical, proportionate and digitally supported solutions.

2 Practice-relevant Challenges from the Perspective of the Windows and Doors Sector

2.1 Structural Characteristics of the Sector

Large parts of the windows and doors sector are characterised by custom-made production and a high degree of product variability. Products are frequently planned and manufactured on a project-specific basis and differ in configuration, material combinations and functional features.

Against this background, the current interpretation of AVS and DoPC requirements gives rise to the following practical challenges:

- **High level of product individualisation**: The current system effectively leads to very granular, product-specific declarations, which are difficult to manage organisationally and economically for craft-based and SME-driven companies.
- **Limited human and financial resources**: A large proportion of companies employ fewer than 20 people. Extensive, recurring external testing and documentation requirements tie up resources that would otherwise be available for quality, innovation and sustainability in production.
- **Administrative complexity**: The large number of technical, environmental and substance-related characteristics to be declared represents a significant administrative burden, particularly for smaller enterprises.

2.2 Methodological and organisational Aspects

- **Representation of declared values**: The blanket application of worst-case approaches for the declaration of characteristics may lead to insufficiently differentiated results and

only partially reflects improvements by changes in configurations, functional features, production processes and material choices.

- **Capacity of Notified Bodies**: The envisaged intensive involvement of Notified Bodies for very high numbers of individualised product types may lead to capacity bottlenecks and planning uncertainties.
- **Digital Product Passport**: The DPP offers significant potential for transparency and efficiency. From the industry's perspective, it is essential that digital, software-based and automated processes are explicitly recognised and integrated.

3 Practical Solution Approach and Proposal for further Development

In light of the above considerations, the undersigning associations suggest complementing the existing CPR instruments with digitally compatible elements. The objective is to fully support the regulatory goals while ensuring a feasible and efficient implementation in practice.

Proposal to insert new Assessment and Verification System AVS 4+ (Verified Software Tool)

As a possible solution, it is proposed to amend Annex IX of the CPR with an additional assessment and verification system, **AVS 4+**. This system could build on the existing legal basis (inter alia Article 10(4) CPR by delegated act) and be specifically tailored to the requirements of SMEs and craft-based manufacturing.

Core concept of AVS 4+

- **Validation of relevant software input parameters**: A Notified Body verifies the required input parameters (e.g. characteristic values of individual components) that are necessary for the assessment of essential characteristics.
- **Validation of the software**: A Notified Body reviews and validates software solutions, including rulesets, implementation of harmonised standards, databases and calculation methodologies.
- **Digital consistency**: Performance of essential chracteristics are automatically derived and documented by the verified software on the basis of verified digital processes of the manufacturer and secured by factory production control of the manufacturer.

This approach builds on proven systems and experience from existing practice and focus on verified process and system reliability.

Possible text for new AVS 4+ in amended Annex IX of CPR

Notified body focusing on verification of software for assessment of product performance.

(a) The manufacturer shall carry out:
   I. an assessment of the performance of the product by using verified software based on validated input parameters;
   II. determine the product type and the product category on the basis of type-testing, type-calculation or tabulated values;
   III. factory production control.

(b) The notified body shall decide on the issuing, restriction, suspension or withdrawal of certificate of the software validation on the basis of:
   I. validation of the input values on the basis of testing performed by a notified testing laboratory (based on sampling carried out by the manufacturer), calculation, tabulated values or documentation describing the parameter;
   II. validation of the software appropriate for the assessment.

4 Concluding Remarks

The undersigning associations explicitly share the objectives of the revised Construction Products Regulation and see themselves as active partners in its implementation. From our perspective, it is crucial that regulatory instruments adequately reflect the diversity of products and production realities in the windows and doors sector.

With proportionate, digitally supported and validated approaches, it is possible to safeguard both the ambitious objectives of the Regulation and the long-term competitiveness, innovative capacity and sustainable value creation of craft-based businesses and SMEs across Europe. Furthermore, it is in line with digitalisation efforts in the construction sector where digital tools and software-based processes are actively promoted at EU level as a means to improve efficiency and reduce administrative burden.

In conclusion, we invite the Commission to engage in a constructive dialogue to arrive at a pragmatic and workable solution beneficial for all, and especially helping SMEs.

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About

European Aluminium, founded in 1981 and based in Brussels, is a member-based industry association representing Europe's most complete and thriving metals value chain. Their 100+ members include companies engaged in bauxite mining; alumina refineries; primary aluminium producers; downstream manufacturers of extruded, rolled and cast aluminium; producers of recycled aluminium and national aluminium associations, representing more than 600 plants in 30 European countries. European Aluminium actively engages with policy makers and the wider stakeholder community to promote the outstanding properties of aluminium, secure growth, and optimise the metal's contribution to meeting the EU's sustainability and industrial leadership ambitions.

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.

EPPA, the European PVC Profiles and related Building Products Association represents the manufacturers of PVC window systems and related building products in Europe. About 25,000 employees process about 1,4 million tonnes of PVC creating a turnover of €4 billion with profile systems and building products. Based in Brussels, EPPA provides a common platform for bundling national activities in the fields of PVC window technology, recycling, environment and public affairs.

Glass for Europe is the trade association for Europe's flat glass sector. Flat glass is the material that goes into a variety of end products, primarily in windows and facades for buildings, windscreens and windows for automotive and transport, as well as solar energy equipment, furniture and appliances.
Glass for Europe brings together multinational firms and thousands of SMEs across Europe to represent the whole building glass value chain. It is composed of flat glass manufacturers, AGC Glass Europe, Guardian, NSG-Group, Saint-Gobain, and Şişecam, and works in association with national partners gathering thousands of building glass processors and transformers all over Europe.

Small Business Standards (SBS) is the European association that represents small and medium-sized enterprises' (SMEs) interests in the standardisation process at both European and international level.

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Co-financed by the European Union and EFTA