Template for comments

Date: 10/02/2026	EuroWindoor gs@eurowindoor.eu	Standardization request CPR project DWS

#	Line number	Clause/ Subclause	Submitted by	Comments	Proposal
Comment number	Reference the line number in the left side of the SR document	Here you write the relevant clause number. When referencing to a table use clause and table-number (ex. 2.1 table b and name of essential characteristic you are referring to)	Name of member state	**What is the argument for the proposed amendment?** Comment on one topic or item at a time. Feel free to make several comments on the same clause. Do not comment on several topics in the same reply.	**What is the desired change?** If possible, write a specific amendment in a way that it can be copied directly into the working document.
		Annex I, Table 1, line 1 (Windows and pedestrian doorsets)	EuroWindoor	The set deadline to 15 June 2029 is very ambitious when taking into account that the request in current draft form will require revision of a large range of supporting classification standards as well as development of new assessment method for watertightness. Additionally, the standard will contain a lot of new content which will require thorough discussions to ensure all aspects are fit for purpose for the very large group of products that is in scope of the standard. It needs to be pointed out that according to formal timeline for standardisation when calculated backwards the technical discussion and drafting of the standard needs to be finished in about 1 year from now which is unrealistic for such extensive product standards like for windows and doors. Furthermore, before a harmonized product standard can be written, the related delegated acts (e.g. for DPP, product requirements, AVS etc.), guidance documents (e.g. for machine readable format,…) and the final templates need to be available.	Please prolong the deadline for ESO for 1 year. Change deadline in line 1 from 15 June 2029 to 15 June 2030
		Annex I, Table 1, line 5 (Windows and pedestrian doorsets)	EuroWindoor	Not least the aspects and rules relating to extension of RSL are new and will require time to develop. Not least because of this the set deadline is very ambitious. Furthermore, as it has been requested to	Change deadline in line 5 from 15 June 2028 to 15 June 2029

				extend the deadline for the development of the harmonised standard for windows and pedestrian doorset the deadline for the related c-PCR could be extended as well without jeopardizing the overall deliverables.	
		Annex II, 2.3, clause 5 (b) – Statistical value	EuroWindoor	So far, no statistical values are required or needed for declared values or classes of windows and doors. Should there statistical methods be needed, they are given in the related supporting standards (e.g. evaluation of testing). There is no need to repeat this in the product standard or DoPC. If new statistical values need to be developed this will lead to additional workload for standardisation and may delay the standardisation process not meeting the deadline.	The point (b) should be deleted to avoid double standardisation or add “when applicable” to the point.
		Annex II, 2.7	EuroWindoor	The TC responsible for drafting the relevant harmonized technical specifications are experts within the products in question and cannot be expected to have the required knowledge to develop the part of the standard that shall ensure “interoperability of the human- and machine-readable formats”.	Make sure there is a horizontal solution which can be adopted directly into the standards developed outside CEN/TC 33.
		Annex II, Part B, 2.1.1.1.1	EuroWindoor	It can be misinterpreted what is intended with the exclusion of hatches to which ladders or stairs are attached. It is suggested to re-phrase.	Change first bullet from “Hatches to which ladders or stairs are attached” to “Hatches with integrated ladders or stairs”
		Annex II, Part B, 2.1.1.1.1	EuroWindoor	It is crucial that the complete product (=window) is not excluded from scope of this standard when the window additionally to its basic function is also used to provide smoke and heat exhaust ventilation. It should only be the characteristics related to that specific use that should be excluded and covered by the standards to be developed based on the standardization request “FFF”. If this split is not done correctly there will be an overlap between standard developed based on this standardisation request for DWS and those developed by FFF.	Change the exclusion from excluding the entire product to only exclude the characteristics specific for securing the natural smoke and heat exhaust function. This can be done by deleting the current bullet and introduce a separate paragraph reading: **Characteristics of fire safety aiming at extending the intended use of windows and hatches to provide natural smoke and heat exhaust ventilation are excluded from scope.**
		Annex II, Part B, 2.1.1.1.2, Table 1,	EuroWindoor	During the recent consultation on the draft delegated regulation for resistance to fire performance classes EuroWindoor also did raise a comment that the class	Delete the characteristic EI-M.

		resistance to fire EI-M		EI-M included in table 4.1 of that draft is not suitable for fixed windows and that a note should be included to exclude this class for fixed windows. No Member State has according to our knowledge requested this characteristic for fixed windows and keeping it will not make sense as the test is so severe that no window will ever be able to withstand the impact force required after having been exposed to fire.	
		Annex II, Part B, 2.1.1.1.2, Table 1, external fire performance	EuroWindoor	External fire is only applicable for products installed in the roof (see delegated act for external fire).	Include in comment: “Only relevant for roof windows”
		Annex II, Part B, 2.1.1.1.2, Table 1, smoke control & self-closing	EuroWindoor	Both smoke control and self-closing is relevant only for openable windows and hatches. The test standard EN 1634-3 for smoke control is only applicable for openable products and fixed windows are always closed.	Please add in comments for both: **“Relevant only for openable products”**
		Annex II, Part B, 2.1.1.1.2, Table 1, ventilation capacity of air transfer devices - airflow coefficient and pressure exponent	EuroWindoor	We do not know a requirement by MS for this characteristic of windows and doors. And the characteristic is much more complex. In previous product standard the characteristic was voluntary which did allow additional explanation. Depending on the design of the air device, the formula for the air flow using C0 and n is not always linear and may contain discontinuities, e.g. with integrated flaps to reduce the air volume flows at higher pressure differences. There are also different air flow rates depending on whether positive or negative pressure is applied.	Because of the complexity the characteristic should be moved to the general product information. We propose to have the option of different air flow rates at different pressure steps for positive and for negative pressure instead of C_0 and n. Alternatively only a single airflow rate at 2 Pa positive pressure could be declared while more details can be given in the general product information.
		Annex II, Part B, 2.1.1.1.2, Table 1, watertightness	EuroWindoor	For end-receivers of the DoPC it is not relevant to have the information that the characteristic is applicable for several product groups, so the information “pedestrian doorsets, windows and rooflights” should not be part of the naming of the characteristic.	Delete “- pedestrian doorsets, windows and rooflights” in the name of the characteristic. If deemed relevant to include somewhere it should be in “comments”.
		Annex II, Part B, 2.1.1.1.2, Table 1, watertightness	EuroWindoor	It is still crucial that both shielded (classes with addition “B”) and non-shielded method (classes with addition “A”) are available. Even though method A is most commonly used for windows there can be	Please make sure to include both shielded and non-shielded classes in Table 33 (see separate comment).

				situations where method B is sufficient, like for sliding door hight windows. If only non-shielded method is available, you may need to over-dimension your products leading to a higher environmental impact than needed.	
		Annex II, Part B, 2.1.1.1.2, Table 1, resistance to snow and permanent load	EuroWindoor	What will be declared for this characteristic is basically only an information about which type of glazing is included in the product, as this is what will be needed to do the calculation on building level to secure the window in installed situation is able to withstand the snow and permanent load likely to appear in the given location of the building. It could therefore make sense to move this characteristic from Table 1 to “general product information”.	Delete the characteristic “resistance to snow and permanent load” from list of essential characteristics and move it to “general product information”.
		Annex II, Part B, 2.1.1.1.2, Table 1, manual operating forces	EuroWindoor	The distinction between “vertical sliding windows” and “non-vertical sliding windows” does not cover tilt and turn windows as it is only for sliding windows. Better wording would be “Windows excl. vertical sliding windows” and “Vertical sliding windows”. But, the wording of each essential characteristic is very long and should be simplified (s. proposal)	Please change the characteristics to: manual window operating forces (Table 34) manual hand operating forces (Table 35) manual finger operating forces (Table 36) manual hand vertical sliding operating forces (Table 37) manual finger vertical sliding operating forces (Table 38)
		Annex II, Part B, 2.1.1.1.2, Table 1, resistance to wind load - pressure limits and relative frontal deflection	EuroWindoor	In the classification according to EN 12210, deflection (class A to C) and wind load (class 1 to 5 or EXXX) always belong together. The class is formed as a pair of alphanumeric values which cannot be considered separately. There is also not always just one pair of values that can be declared for a product; there can also be several. For example, a product can be classified with C3 and B4 at the same time, i.e. it fulfils the deflection l/300 at 1200 Pa but also l/200 at 1600 Pa. We prefer to stay with the existing classification, but if it needs to be splitted, it should be done differently (see proposal).	Please change the characteristics to: Testing: resistance to wind load for <1/150 frontal deflection (Table 40) resistance to wind load for <1/200 frontal deflection (Table 40) resistance to wind load for <1/300 frontal deflection (Table 40) Calculation: resistance to wind load – relative frontal deflection (Table 41)
		Annex II, Part B, 2.1.1.1.2, Table 1, thermal transmittance - testing	EuroWindoor	The preferred option is still to merge all three methods into one characteristic. However if this will not be accepted calculation should be the preferred option and testing should only be allowed when the calculation method is not suitable. This to avoid the	Add in comment for testing “Only applicable if product is not suitable for calculation”.

				situation where different MS's prescribe different methods which will lead to unnecessary expensive testing by manufacturers without any real added value for the market.	
		Annex II, Part B, 2.1.1.1.2, Table 1, thermal transmittance - glazing	EuroWindoor	The performance of the glazing will simply be a passing on of information from the supplier so it is suggested to move this characteristic to "general product information"	Move "thermal transmittance – glazing" to "general product information"
		Annex II, Part B, 2.1.1.1.2, Table 1, thermal transmittance - component values	EuroWindoor	Windows can have different profiles on top, bottom, left, right and in the middle section which can cause at minimum 5 different Uf values for combination frame and sash. Also, the PSI values can be different. It is not clear which value to declare and how to link this in the DoPC to the right profile. Therefore, it is crucial that it will be possible to declare only one representative compontent value for the entire window. Neither to declare worst section value nor declaring all different section values are suitable alternatives. So it would be better to move the component values to the general product information.	If component values are to be declared in the DoPC and will not be transferred to general product information, allow declaration of a single value for each component as it will be defined in the standard.
		Annex II, Part B, 2.1.1.1.2, Table 1, thermal transmittance with extended shutter	EuroWindoor	The word "extended" is not very clear. Please use "closed". As for thermal transmittance of window, the declared performance will be for reference size.	Replace "extended" with "closed" – this also applies for "total solar energy" and "light transmittance"
		Annex II, Part B, 2.1.1.1.2, Table 1, Air permeability	EuroWindoor	There is no need to have "windows and external doorsets" as part of the name of the characteristic. The characteristic for air permeability should be merged to a single classification following the rule in 4.7 of EN 12207:2017.	Please remove "windows and external doorsets". Please merge the two characteristics to a single one. This is in line with the declaration today.
		Annex II, Part B, 2.1.1.1.2. Total solar energy transmittance - glazing and light transmittance – glazing	EuroWindoor	The values linked directly to the glazing will be passed on by suppliers so it is suggested to move these two characteristics to "general product information"	Please move *Total solar energy transmittance - glazing* and *light transmittance – glazing* to general product information

		Annex II, Part B, 2.1.1.2.1, scope	EuroWindoor	Internal pedestrian doorsets are never used as natural smoke and heat exhaust ventilators, so this exclusion can be omitted.	Delete the paragraph related to natural smoke and heat exhaust ventilations as not relevant for internal pedestrian doorsets.
		Annex II, Part B, 2.1.1.2.1. second last sentence “A power-operated…”	EuroWindoor	The terms open or close in context for power operated revolving doors do not exist.	Please change to: A power-operated product **provide passage** upon receipt of a manual or automatic actuating signal.
		Annex II, Part B, 2.1.1.2.2, Table 2, ventilation capacity of air transfer devices - airflow coefficient and pressure exponent	EuroWindoor	We do not know a requirement by MS for this characteristic of windows and doors. And the characteristic is much more complex. In previous product standard the characteristic was voluntary which did allow additional explanation. Depending on the design of the air device, the formula for the air flow using C0 and n is not always linear and may contain discontinuities, e.g. with integrated flaps to reduce the air volume flows at higher pressure differences. There are also different air flow rates depending on whether positive or negative pressure is applied.	Because of the complexity the characteristic should be moved to the general product information. We propose to have the option of different air flow rates at different pressure steps for positive and for negative pressure instead of C_0 and n. Alternatively only a single airflow rate at 2 Pa positive pressure could be declared while more details can be given in the general product information.
		Annex II, Part B, 2.1.1.2.2, Table 2, manual operating forces	EuroWindoor	The wording of each essential characteristic is very long and should be simplified (s. proposal)	Please change the characteristics to: manual door operating forces (Table 49) manual hand operating forces (Table 50) manual finger operating forces (Table 51)
		Annex II, Part B, 2.1.1.2.2, Table 2, thermal transmittance - testing	EuroWindoor	The preferred option is still to merge the option for testing with the one for calculation. However if this will not be accepted calculation should be the preferred option and testing should only be allowed when the calculation method is not suitable. This to avoid the situation where different MS’s prescribe different methods which will lead to unnecessary expensive testing by manufacturers without any real added value for the market.	Add in comment for testing “Only applicable if product is not suitable for calculation”.
		Annex II, Part B, 2.1.1.2.2, Table 2, thermal transmittance – tabulated values	EuroWindoor	No tabulated values for internal pedestrian doorset exist	Delete this characteristic

		Annex II, Part B, 2.1.1.2.2, Table 2, thermal performance – component values	EuroWindoor	The introduction of component values is an overcomplication of the situation when we talk “internal pedestrian doorset”. For these products U-value based on a reference size will be sufficient.	Delete the following characteristics: Thermal transmittance – glazing Thermal transmittance – frame Thermal transmittance – opaque panel Linear thermal transmittance at glazing, spacer and frame transition Linear thermal transmittance between opaque panel and frame Linear thermal transmittance of glazing bars Light transmittance – glazing
		Annex II, Part B, 2.1.1.2.2, Table 2, Air permeability	EuroWindoor	There is no need to have “internal doorsets” as part of the name of the characteristic. The characteristic for air permeability should be merged to a single classification following the rule in 4.7 of EN 12207:2017.	Please remove “internal doorsets”. Please merge the two characteristics to a single one. This is in line with the declaration today.
		Annex II, Part B, 2.1.1.2.4	EuroWindoor	Of the list of general product information only “clear opening height”, “clear opening width” and “test climate under which the climate related deformation was determined” are needed. “Ventilation area at open position” is irrelevant for a door, those linked to thermal performance (area, perimeter and length) will be unnecessary if those characteristics are deleted as proposed in another comment, and the “torques” are part of the class for manual operating forces like for windows.	Delete (1), (4), (5), (6), (7), (8), (9), (11) and (12)
		Annex II, Part B, 2.1.1.3.1, scope	EuroWindoor	External pedestrian doorsets are never used as natural smoke and heat exhaust ventilators, so this exclusion can be omitted.	Delete the paragraph related to natural smoke and heat exhaust ventilations as not relevant for external pedestrian doorsets.
		Annex II, Part B, 2.1.1.3.1. second last sentence “A power-operated…”	EuroWindoor	The terms open or close in context for power operated revolving doors do not exist.	Please change to: A power-operated product **provide passage** upon receipt of a manual or automatic actuating signal.
		Annex II, Part B, 2.1.1.3.2, Table 3, ventilation capacity of air	EuroWindoor	We do not know a requirement by MS for this characteristic of windows and doors. And the characteristic is much more complex. In previous	Because of the complexity the characteristic should be moved to the general product information.

		transfer devices - airflow coefficient and pressure exponent		product standard the characteristic was voluntary which did allow additional explanation. Depending on the design of the air device, the formula for the air flow using C0 and n is not always linear and may contain discontinuities, e.g. with integrated flaps to reduce the air volume flows at higher pressure differences. There are also different air flow rates depending on whether positive or negative pressure is applied.	We propose to have the option of different air flow rates at different pressure steps for positive and for negative pressure instead of C_0 and n. Alternatively only a single airflow rate at 2 Pa positive pressure could be declared while more details can be given in the general product information.
		Annex II, Part B, 2.1.1.3.2, Table 3, watertightness	EuroWindoor	For end-receivers of the DoPC it is not relevant to have the information that the characteristic is applicable for several product groups, so the information “pedestrian doorsets, windows and rooflights” should not be part of the naming of the characteristic.	Delete “pedestrian doorsets, windows and rooflights” in the name of the characteristic. If deemed relevant to include somewhere it should be in “comments”.
		Annex II, Part B, 2.1.1.3.2, Table 3, watertightness	EuroWindoor	There is a need to have both existing test methods for external pedestrian doorset – the shielded (classes with addition “B”) and the non-shielded method (classes with addition “A”). The difference cannot be handled via classes only, as the spray angle of the water is different in the two situations reflecting the situation where the door is protected by an overhang (shielded) or not (non-shielded).	Do not change the approach to how watertightness is being tested as both methods are needed and requested.
		Annex II, Part B, 2.1.1.3.2, Table 3, manual operating forces	EuroWindoor	The wording of each essential characteristic is very long and should be simplified (s. proposal)	Please change the characteristics to: manual door operating forces (Table 49) manual hand operating forces (Table 50) manual finger operating forces (Table 51)
		Annex II, Part B, 2.1.1.3.2, Table 3, resistance to wind load – pressure limits - calculation	EuroWindoor	It is not possible to calculate pressure limits	Please delete this characteristic
		Annex II, Part B, 2.1.1.3.2, Table 3, resistance to wind load - pressure	EuroWindoor	In the classification according to EN 12210, deflection (class A to C) and wind load (class 1 to 5 or EXXX) always belong together. The class is formed as a pair of alphanumeric values which cannot be considered separately. There is also not always just one pair of values that	Please change the characteristics to: Testing: resistance to wind load for <1/150 frontal deflection (Table 40) resistance to wind load for <1/200 frontal deflection (Table

		limits and relative frontal deflection		can be declared for a product; there can also be several. For example, a product can be classified with C3 and B4 at the same time, i.e. it fulfils the deflection l/300 at 1200 Pa but also l/200 at 1600 Pa. We prefer to stay with the existing classification, but if it needs to be splitted, it should be done differently (see proposal).	40) resistance to wind load for <1/300 frontal deflection (Table 40) Calculation: resistance to wind load – relative frontal deflection (Table 41)
		Annex II, Part B, 2.1.1.3.2, Table 3, thermal transmittance – testing	EuroWindoor	The preferred option is still to merge the option for testing with the one for calculation. However if this will not be accepted calculation should be the preferred option and testing should only be allowed when the calculation method is not suitable. This to avoid the situation where different MS's prescribe different methods which will lead to unnecessary expensive testing by manufacturers without any real added value for the market.	Add in comment for testing "Only applicable if product is not suitable for calculation".
		Annex II, Part B, 2.1.1.3.2, Table 3, thermal transmittance – tabulated values	EuroWindoor	No tabulated values for external pedestrian doorset exist	Delete this characteristic
		Annex II, Part B, 2.1.1.3.2, Table 3, thermal performance – component values	EuroWindoor	The introduction of component values is an overcomplication of the situation when we talk "external pedestrian doorset". For these products U-value based on a reference size will be sufficient.	Delete the following characteristics: Thermal transmittance – glazing Thermal transmittance – frame Thermal transmittance – opaque panel Linear thermal transmittance at glazing, spacer and frame transition Linear thermal transmittance between opaque panel and frame Linear thermal transmittance of glazing bars Light transmittance – glazing
		Annex II, Part B, 2.1.1.3.2, Table 3, Air permeability	EuroWindoor	There is no need to have "windows and external doorsets" as part of the name of the characteristic. The characteristic for air permeability should be merged to a single classification following the rule in 4.7 of EN 12207:2017.	Please remove "windows and external doorsets". Please merge the two characteristics to a single one. This is in line with the declaration today.

		Annex II, Part B, 2.1.1.3.4	EuroWindoor	Of the list of general product information only “clear opening height”, “clear opening width” and “test climate under which the climate related deformation was determined” are needed. “Ventilation area at open position” is irrelevant for a door, those linked to thermal performance (area, perimeter and length) will be unnecessary if those characteristics are deleted as proposed in another comment, and the “torques” are part of the class for manual operating forces like for windows.	Delete (1), (4), (5), (6), (7), (8), (9), (11) and (12)
		Annex II, Part B 2.4.1.1.2, Table 7 and 8	EuroWindoor	Essential characteristic “bar projection” was not a relevant point in the performance declaration of the standards EN 179 + EN 1125. It should be removed from tables 7 (Panic exit devices) and 8 (emergency exit device), as it is not that relevant compared to other values	Remove first line of tables 7 +8 (bar projection)
		Annex II, Part B 2.4.1.8.2, Table 14	EuroWindoor	Essential characteristics are messed up. See table 15/16 Closing time deviation decrease >= 30% Controlled closing - >= 70% closing time deviation - increase | ≤ 100% | closing time deviation - decrease | ≤ 30% | controlled closing | ≥ 20 s | Table 82	Closing time deviation decrease >= 30% Closing time deviation increase >= 100% Controlled closing - >= 70°
		Annex II, Part B 2.4.1.8.2 Table, 14 & 2.4.1.9.2 Table 15 & 2.4.1.10.2, Table 16	EuroWindoor	Missing essential characteristic: Latch control Delayed closing and backcheck are listed, latching action not. Important function for closing a door See EN 1154 - 5.2.12 & ZA1	Latch control – EU threshold <= 15°
		Annex II, Part B 2.4.1.8.2 Table, 14	EuroWindoor	Missing essential characteristic: Fire/smoke door suitability	Class 0 – not suitable Class 1 - suitable

		& 2.4.1.9.2 Table 15 & 2.4.1.10.2, Table 16		EN 1154 - 4.5 e.g. for door closers with integrated mechanical hold open function	
		Annex II, Part B 2.4.1.9.2 Table 15 & 2.4.1.10.2, Table 16 vs. Annex II, Part G Table 82	EuroWindoor	Controlled closing EU Threshold and classes do not match Table 15/16: Threshold 20 s Table 82: Class 1 – >= 70° Class 2 - >= 90°	Table 15/16: EU Threshold >= 70°
		Annex II, Part B 2.4.1.10.2, Table 16	EuroWindoor	The comments in the "Comment" column are not clearly formulated. “Integrated products” mean only integrated in doorc closing devices as specified in 2.4.1.8, meaning not integrated in power operated door closers but in door closers according EN 1154 and electrically powered hold open devices according EN 1155. Power operated pedestrian door drives are defined e.g. in EN 17372 with different door closer moments compared to EN 1154. This is relevant to all lines of the table except the last two.	Change comments to “mandatory declaration for door coordinator integrated in door closing devices. Not applicable e.g. to power operated pedestrian door drives” “mandatory declaration for electrically powered integrated door closing devices. Not applicable e.g. to power operated pedestrian door drives”
		Annex II, Part B 2.4.1.10.2, Table 16	EuroWindoor	Last two lines of Table 16: Only Table 89 and Table 62 are listed as mandatory for all door coordinators (integrated and external). These tables contain only requirements for durability measured in cycles (Table 89) and a corrosion class (Table 62). In the former Table ZA.1a of EN 1158 were additional performance requirements listed regarding - Application class of the door coordinator device/ resistance in waiting position - Overload behavior - Use for fire protection doors - Manipulation	Add further tables with performance declarations according to the current EN 1158, sections 5.1.2, 5.1.3, 5.2.1-5.2.4, 5.2.6, 5.2.8 or clarify.

<table>
<tr><td></td><td></td><td></td><td></td><td>- No damage
See first line of attached table:

EN 1158:1997 + A1:2002 (D)

Tabelle ZA.1a — Anwendungsbereich und Abschnitte dieser Norm, die für die wesentlichen Merkmale gelten

<table><tr><td colspan="4">Produkt: Schließfolgeregler, einschließlich aller Schutzplatten und Funktionsteile und, wenn erforderlich, Mitnehmerklappe, separat montiert entsprechend dem Anwendungsbereich dieser Norm
Vorgesehene Anwendung: An Feuer- und Rauchschutztüren (zur Erfüllung der Anforderung an diese Türen „selbstschließend“ zu sein)</td></tr><tr><td>Anforderung/ Merkmal</td><td>Abschnitte in dieser Europäischen Norm mit Anforderungen</td><td>Vorgeschriebene Stufen und/oder Klassen</td><td>Bemerkungen (Leistungskriterien)</td></tr><tr><td>Selbstschließen</td><td>5.1.2 und 5.1.3
5.2.1 bis einschließlich 5.2.4
5.2.6
5.2.8</td><td>keine</td><td>Bestanden/nicht bestanden Kriterien für:
Anwendungsklasse: Widerstand der Warteposition
Größe: Überlastverhalten in Schließrichtung
Anwendbarkeit an Feuer-/Rauchschutztüren: Eignung für Feuer-/Rauchschutztüren
Sicherheit: Funktionsbeeinflussung durch Manipulation Beschädigung</td></tr><tr><td>Dauerfunktion des Selbstschließens</td><td>5.2.5
5.2.7.1 und 5.2.7.2</td><td>keine</td><td>Bestanden/nicht bestanden Kriterien für:
Dauerfunktion: Anzahl der Prüfzyklen
Korrosionsbeständigkeit: Korrosionsklasse</td></tr><tr><td>gefährliche Substanzen</td><td>siehe Anmerkung 1 oben</td><td>keine</td><td>siehe Abschnitt ZA.3</td></tr></table></td><td></td></tr>
<tr><td></td><td></td><td>Annex II, Part D</td><td>EuroWindoor</td><td>Dealing with emission on individual substance level is very impractical, and especially for DWS product family where the level of emissions is traditionally very low the number of characteristics this will lead to seems out of proportion to other technical performance values.</td><td>We encourage the EC and MS to continue working towards developing a classification system.
TVOC should be reintroduced. We propose to use only the essential characteristics “TVOC” for “emissions of dangerous substances” and the requirement single substances can be given as product information when relevant.</td></tr>
<tr><td></td><td></td><td>Annex II, Part E, section 3, Table 32: List of harmonised scenarios, Module A5 Installation</td><td>EuroWindoor</td><td>According to EN 15804, clause 6.2.3, Module A5 should take into account installation emissions,

‘’including provision of all materials, products and energy, as well as waste processing up to the end-of-waste state or disposal of final residues during the construction process stage. These information modules also include all impacts and aspects related to any losses during this construction process stage (i.e. production, transport, and waste processing and disposal of the lost products and materials).’’</td><td>processes, ancillary materials and energy consumed to install the reference unit, and waste processing up to the EoW state or disposal of all residues (e.g., packaging materials, off-cuts) that arise during the installation</td></tr>
</table>

		Annex II, Part E, section 3, Table 32: List of harmonised scenarios, Module C3 Processing for recycling	EuroWindoor	The comment mentions “applicable material flow”. To be more clear, it should be stated “relevant” instead of “applicable”.	Change comment to: ‘’different scenarios to be defined in the standard for each **relevant** material flow …''
		Annex II, Part E, section 3, Table 32: List of harmonised scenarios, Module C3 Processing for recycling	EuroWindoor	According to EN15804, clause 6.3.5.5., End-of-Life ‘’C3 waste processing e.g. collection of waste fractions from the deconstruction and waste processing of material flows intended for reuse, recycling and energy recovery.’’ Currently **energy recovery** is not reflected in the table.	Introduce a new line in Table 32, marked as: Module C3, processing for energy recovery, and introduce the following similar comment: ‘’different scenarios to be defined in the standard for each **relevant** material flow and **energy recovery** process: timber, PVC, aluminium, glass, steel, sealants, cloth, etc''
		Annex II, Part F, 3 Watertightness	EuroWindoor	The current text for defining the basic principle of watertightness could be improved e.g. by using the description from EN 1027.	Replace current text with: “the ability of a construction product to resist water penetration under the assessment conditions up to a defined pressure”
		Annex II, Part F, 7, 8 & 9 energy and light transmission	EuroWindoor	The word “extended” is not very clear. Please use “closed”.	Replace “extended” with “closed” both in headings and text in all three clauses
		Annex II, Part F, 15 Ventilation Capacity of Air Transfer Devices	EuroWindoor	Depending on outcome of comment to Annex II, Part B, Table 1, 2 and 3 “ventilation capacity of air transfer devices” the text will need to be modified accordingly.	Modify text to align with decision taken on how and what to declare on ventilation devices in Annex II, Part B, Table 1, 2 and 3.
		Annex II, Part G	EuroWindoor	Change of test and classification standards will have a huge impact on the market requesting expensive re-evaluation and retesting. Some of the tabulated classification data is adding new classes and changing the test methodologies.	Please keep existing test standards and classification standards in Part G and refer to the standard numbers.
		Annex II, Part G.12 watertightness, Table 33	EuroWindoor	Having one test method to cover both windows/doors and rooflights will contradict physics. The spray angle on a product which is installed either vertical or in inclined roof will have to be different to that on a product installed horizontally or only slightly inclined to replicate rain. For this reason alone there has to be	As a minimum difference should be maintained between the watertightness test method for windows/doors (incl. roof windows) and rooflights due to the fundamental difference in intended use. Furthermore, it is highly recommended **not** to require merging of the existing two methods (shielded and non-

				a distinction between the watertightness test method for windows/doors (incl. roof windows) and that for rooflights. Furthermore, by merging the existing method A and B used for windows/doors, will exclude some products today placed and used legally on the market. Some products are designed to be installed under overhang and have therefore been developed and tested according to the shielded method (method B) and these products are not likely to be able to withstand water ingress at the pressure levels previously tested against.	shielded) used for windows and doors (incl. roof windows) as this must be expected to make some products legally used today not possible to use in the future.
		Annex II. Part G.25 air permeability, Figure 2	EuroWindoor	The unit of the air permeability is $m^3/h*m^2$ while the technical context assumes a unit of $m^3/(h*m)$	Change unit to $m^3/(h*m)$
		Annex II, Part G.27 manual operating forces (doors), Table 49	EuroWindoor	The classes given in Table 49 correctly reflect the standard, however as it has been proposed to have “closing or commence motion force” as a separate essential characteristic class 5 no longer makes sense (equal to class 2). That only makes sense when used as intended in combination with the measuring of the actual operating force of the handle.	If kept separate, then class 5 should be deleted.
		Annex II, Part G.27 manual operating forces (doors), Table 50 + 51	EuroWindoor	Like for windows (table 35 and 36) the torques shall also be included in table 50 and 51 respectively.	Add a column in Table 50 with following values: 10, 5, 2.5, 1 and 5 Add a column in Table 51 with following values: 5, 2.5, 1.5, 1 and 1.5
		Annex II, Part G.27 manual operating forces (doors), Table 50 + 51	EuroWindoor	If Table 50 and 51 respectively are not merged with Table 49 class 5 will not make sense and should be deleted	If not merged delete class 5 in both table 50 and 51
		Annex II. Part G, 30 air permeability, Figure 4	EuroWindoor	The unit of the air permeability is $m^3/h*m^2$ while the technical context assumes a unit of $m^3/(h*m)$	Change unit to $m^3/(h*m)$

		Annex II. Part G.33 resistance to wind load (industrial doors), Table 55	EuroWindoor	Description text in first column contains ‘pressure’ but should be ‘suction’	Replace ‘pressure’ with ‘suction’
		Annex II. Part G.38 release force	EuroWindoor	Invers requirement/classification It should be said under which condition something is applied rather than which ‘not-condition’ is applied.	Change to ‘Release Force with load of 0N’. (Change also in Part B, Table 7)
		Annex II. Part G.41 corrosion resistance, Table 62	EuroWindoor	Class 0 is missing. Class 0 is relevant for door closers with integrated smoke detection. EN 1154 – 4.7 Smoke detectors and door closers are tested very different for corrosion. Salt spray test (standard testing for door closers / EN 1154 → EN 1670) is problematic for smoke detectors (EN 60068-2-78, EN 60068-2-42).	Add class 0 – 0 h
		Annex II. Part G.58 controlled closing, Table 82	EuroWindoor	Wrong column designation cycles	Rename “cycles” to “Door opening angle”
		Annex II. Part G.58 controlled closing, Table 82	EuroWindoor	controlled closing class 1 - >= 70° class 2 - >= 90° door closers can be opened up to 180° (EN 1154 – 4.2) → at least half of the closing process is NOT controlled. Therefore, classes higher than 90° are needed.	Class 1 - >= 70° Class 2 - >= 90° Class 3 - >= 110° Class 4 - >= 150°
		Annex II. Part G.59 delayed closing, Table 83	EuroWindoor	Designation of essential characteristic in the table wrong	Change “controlled closing” to “Delayed closing”.
		Annex II. Part G.59 delayed closing, Table 83	EuroWindoor	Class 1 - >0 s <5 s That would be the description for “no delayed closing function” → NULL. Class 2 - >5 s <=15 s That would be the description for “weak delayed closing”. Class 3 - >15 s <=25 s	Delete class 1 and change to: declaration | time | | 1 | > 5 s | <= 15 s 2 | > 15 s | < 25 s

<table>
<tr><td></td><td></td><td></td><td></td><td>That would be the description for “strong delayed closing”.</td><td></td></tr>
<tr><td></td><td></td><td>Annex II. Part G.60 angles of operation, Table 84</td><td>EuroWindoor</td><td>Class 1 >= 105°
Today class 3 is >= 105°
Class 2 - >= 185°
Today class 4 is >= 180°
180° is enough, opening angles of more than 180° are unrealistic.
See EN 1154 – 4.2

In the Table the column for angles of operation is named “time”</td><td>Adopt classification according to EN 1154.

Change heading in table from “time” to “angle”.</td></tr>
<tr><td></td><td></td><td>Annex II. Part G.61+62 temperature dependence of closing time, Table 85&86</td><td>EuroWindoor</td><td>A table with two columns for time would be clearer (see table 83)</td><td><table><tr><td>declaration</td><td colspan="2">Time</td></tr><tr><td>1</td><td>>= 4 s</td><td>< 8 s</td></tr><tr><td>2</td><td>>= 8 s</td><td>< 15 s</td></tr><tr><td>3</td><td>>= 15 s</td><td>< 25 s</td></tr></table></td></tr>
<tr><td></td><td></td><td>Annex II. Part G.61+62 temperature dependence of closing time, Table 85&86</td><td>EuroWindoor</td><td>Threshold 3 s is unfavorable. EN 1154 – 5.2.9 is deficient in this regard concerning the related requirements
A closing time of 3 s out of 90° door opening is not controlled closing (depending on mounting position and door closer design the closing of a door without damping takes between ~2,5s and 3 s when testing acc. EN 1154).</td><td><table><tr><td>declaration</td><td colspan="2">Time</td></tr><tr><td>1</td><td>>= 4 s</td><td>< 8 s</td></tr><tr><td>2</td><td>>= 8 s</td><td>< 15 s</td></tr><tr><td>3</td><td>>= 15 s</td><td>< 25 s</td></tr></table></td></tr>
<tr><td></td><td></td><td>Annex II. Part G.61+62 temperature dependence of closing time, Table 85&86</td><td>EuroWindoor</td><td>Threshold 5 s is unfavorable. Testing starts with 5 s at normal temperature (EN 1154 - 5.2.9). Even a door closer with almost perfect temperature stability will not reach the 5 s initial closing time due to measurement tolerances.
Better: classes for slight deviation, medium deviation, strong deviation.
Slight deviation: 4-8 s (in practice, no readjustment is necessary if temperature changes)</td><td><table><tr><td>declaration</td><td colspan="2">Time</td></tr><tr><td>1</td><td>>= 4 s</td><td>< 8 s</td></tr><tr><td>2</td><td>>= 8 s</td><td>< 15 s</td></tr><tr><td>3</td><td>>= 15 s</td><td>< 25 s</td></tr></table></td></tr>
</table>

Template for comments

Date: 10/02/2026	EuroWindoor gs@eurowindoor.eu	Standardization request CPR project DWS

		Annex II. Part G.63 durability of self-closing, Table 87	EuroWindoor	Due to the increasing number of frequently used doors, a new durability class specifying a minimum of 1.000.000 cycles is required. This class exceeds the existing 500.000-cycle classification and ensures that door closers meet higher durability and performance expectations for high-traffic applications.	Class 7 – 200.000 cycles Class 8 – 500.000 cycles Class 9 – 1.000.000 cycles
		Annex II. Part G.64 manual release of hold-open device, Table 88	EuroWindoor	Wrong columns designation: time EN 1155 – 5.2.6	Change “time” to “Manual release”
		Annex II. Part G.64 manual release of hold-open device, Table 88	EuroWindoor	Two columns for hold open moment would be clearer	<table><tr><td>declaration</td><td colspan="2">Manual release</td></tr><tr><td>1</td><td>>= 15 Nm</td><td>< 40 Nm</td></tr><tr><td>2</td><td>>= 40 Nm</td><td>< 120 Nm</td></tr><tr><td>3</td><td>>= 120 Nm</td><td></td></tr></table>
		Part I	EuroWindoor	The given input in Part I of SR is not clear enough for drafting the standards in CEN/TC 33.	More detailed guidance from the Commission or CEN is needed.

1. Use the comment template every time you comment on documents.
2. Make one comment in each row. This will help us that your comments will be understood and addressed appropriately.
3. Avoid referring to "the argument above". Include your argument in each comment.