



EuroWindowor Response to Commission Positions: Balancing Legal Compliance and Practical Implementation

On 16 April 2026, the European Commission (DG GROW H.1) participated in the CEN/TC 33 plenary meeting to discuss the draft standardization request for windows, doors and related products under the Construction Products Regulation (EU) 2024/3110 (CPR). The Commission presented its positions on key issues raised in CEN/TC 33's comments and provided clarifications on the planned timeline, regulatory requirements and implementation approach.

The Commission emphasized that the positions presented were provisional and subject to further discussion and expressly invited stakeholders to provide feedback on points where fundamental concerns remain. The importance of dialogue was underlined to ensure the standardization request would be both legally compliant and practically workable.

EuroWindowor welcomes this constructive approach and the opportunity for continued engagement. This document addresses several critical points discussed during the meeting, highlighting specific risks and practical challenges foreseen in the implementation of certain proposals. Alternative approaches are suggested that would maintain legal compliance under the CPR whilst ensuring workability for manufacturers across the European market.

1 Normative References and Supporting Standards Challenges

1.1 Commission Position:

The Commission has stated that harmonised **standards with undated references cannot be cited**, as this would provide too much flexibility. The same rule applies to the chain of normative references. The Commission recommends including references to specific clauses to limit scope and assesses undated references on a case-by-case basis — terminology references may be acceptable, but test methods affecting performance are not.

1.2 Challenge:

This strict approach creates significant practical problems for harmonised product standards. Windows and doors rely on numerous supporting standards (test methods, terminology, materials and classification standards), many of which are managed by other CEN/TCs or by ISO/TCs. Managing dated references across complex reference chains increases the risk of inconsistencies and errors.

1.3 EuroWindowor Proposal:

Primary solution (preferred): Incorporate a **single regulatory sentence** in harmonised product standards that addresses undated references in supporting standards, similar to the approach used in legislation of some Member States:

"Where dated technical rules applied under this standard refer to undated technical rules, the latter shall be applied in the version current at the time of publication of the dated technical rule."

This approach offers multiple advantages: minimal effort, no delay in completing standards, no need to modify CEN rules and elimination of errors from managing multiple dated references.

Alternative solution (if primary approach is not acceptable): The Commission should provide clear confirmation that the **declaration of a complete chain of supporting standards** with dates in each harmonised product standard is permitted without procedural obstacles. Without such clarification, significant delays in the standardisation process are unavoidable.

Both solutions maintain legal certainty while ensuring that harmonised standards remain workable and can be developed within reasonable timeframes.

2 Scope and Structure: Internal and External Doors, Hatches, and Product Tables

2.1 Commission Position:

The Commission has stated that **two CE markings on one product are not possible** under the new CPR, adhering to the principle "one product, one standard." While the Digital Product Passport can reference two Declarations of Performance and Conformity (DoPCs) with one data carrier, the Commission is considering merging internal and external door sets into a single standard.

2.2 Challenge:

Merging internal and external doors into a single standard with a unified product table creates significant practical and technical problems. Internal and external doors have fundamentally different performance requirements, testing regimes, maintenance obligations, and environmental impact data. A single merged table would either become excessively complex and confusing for manufacturers and users, or would force inappropriate requirements onto products where they are not relevant. This approach contradicts market reality, where internal and external doors represent distinct product categories with different supply chains, manufacturing processes, and regulatory obligations. Furthermore, several National Standardisation Bodies have expressed a clear preference for maintaining separate treatment of these product categories due to their differing national building requirements. The existing separate harmonized standards reflect this reality and address dedicated product requirements for internal and external doors.

2.3 EuroWindoor Proposal:

EuroWindoor strongly advocates for **maintaining separate product tables for internal and external doors** within the harmonised standard, even if they must be included in a single standard document to comply with the Commission's "one product, one standard" principle.

Separate tables would:

- Reflect the distinct performance characteristics and regulatory requirements of each product category
- Simplify compliance and reduce confusion for manufacturers, specifiers, and enforcement authorities
- Allow appropriate differentiation in maintenance requirements and environmental data
- Accommodate national building regulations that treat internal and external doors differently
- Maintain clarity in the Digital Product Passport system by clearly distinguishing product types

The tables should also address **specific performance characteristics for hatches**, possibly differentiating internal and external hatches (performances of internal hatches are pretended to be related to internal doors' whereas external hatches should be addressed more likely like windows).

This approach respects the Commission's principle while preserving the technical and practical logic necessary for workable standards. EuroWindoor is prepared to provide detailed technical justification for this separation, demonstrating that internal and external doors constitute functionally distinct products that warrant differentiated treatment within the standardisation framework.

3 Support for pragmatic Approach to Natural Smoke and Heat Exhaust Ventilation (NSHEV) Inclusion

3.1 Commission Position:

The Commission has clarified that under the CPR, excluding specific performance characteristics from products is not possible—the CPR does not allow excluding product functions. Three options exist: exclude products entirely from the harmonized zone (meaning no CE marking), include all

relevant performances in the DWS Standardisation Request and standards or as the final option include all relevant performances in the FFF Standardisation Request and standards. The Commission has proposed a **pragmatic approach: temporarily exclude NSHEV products from the DWS scope**, then amend the Standardisation Request with relevant characteristics once discussions in the firefighting equipment subgroup conclude (approximately two years).

3.2 Challenge:

NSHEV functionality represents a critical safety feature for certain window and rooflight products. However, the regulatory framework for firefighting and smoke control equipment is currently under development, and the technical requirements, testing methods, and assessment procedures for NSHEV are not yet finalised. Including NSHEV in the current DWS Standardisation Request without clarity on these technical requirements would create legal uncertainty and potentially conflicting obligations. However, including windows and rooflights with NSHEV characteristics completely in the FFF Standardisation Request also risk creating legal uncertainty and overlaps, and as these products are first and foremost windows / rooflights this does not seem like a workable solution. Finally, the option of permanently excluding products with NSHEV functionality from CE marking would remove essential products from the harmonised framework and create market barriers.

3.3 EuroWindoor Proposal:

EuroWindoor supports the Commission's pragmatic approach of temporarily excluding NSHEV products from the current DWS Standardisation Request, with a clear commitment to amend it once the FFF Acquis Subgroup has finalised its technical milestones.

This approach:

- Avoids creating conflicting or premature technical requirements before the fixed firefighting equipment framework is established
- Prevents unnecessary delays in completing standards for the majority of windows and rooflights that do not have NSHEV functionality
- Ensures that NSHEV products can be properly integrated into the harmonised framework once clear technical criteria are available
- Provides legal certainty for both manufacturers and market surveillance authorities during the transition period

EuroWindoor recommends that the Commission as early as possible ensures communication to FFF Acquis Subgroup about the aim of merging the technical work from that group on NSHEV functionalities into the DWS Standardisation Request as this will have impact on the scope, division of products into subfamilies and formulation of essential characteristics. To ensure, the inclusion of NSHEVs into the DWS Standardisation Request as soon as possible EuroWindoor would appreciate that the Commission provides a clear timeline and communication as soon as possible.

4 Essential Characteristics – Separate vs. Merged

4.1 Commission Position:

The Commission has provided a rationale for **separating essential characteristics by assessment method** (testing, calculation, tabulated values). According to the Commission, defining a single characteristic would make testing the legal reference method, with alternative methods (calculation, tables) only usable under manufacturer responsibility. This would enable customers to always demand testing and Member States would likely only recognize testing as the accepted method. The Commission argues that separate characteristics provide manufacturers and regulators flexibility to adapt to their needs, allowing Member States freedom to choose accepted methods, with lower risk than a single characteristic approach.

4.2 Challenge:

The splitting of essential characteristics according to the assessment methods (testing, calculation and tabulated values) means that customers, planners and contracting authorities must specify the assessment method in addition to the performance value and everybody is free to

choose a different method. This, in turn, means that manufacturers must declare the performance values using all the assessment methods. This situation increases the costs of performance assessment enormously. The testing method is very costly and time-consuming for window and door product systems, which come in a wide variety of variants. Furthermore, it is likely that current laboratory capacities are insufficient for the testing method. This also contradicts Article 5 of the Construction Products Regulation, which stipulates that “performance harmonised standards shall [...] provide methods for assessing the performance of products in relation to their essential characteristics that are less onerous than testing.”

One Example: Laboratory testing using the hot-box-method in accordance with EN ISO 12567-1 to determine the U_w value for windows and doors is very costly and time-consuming. A test takes anywhere from several hours to several days. A huge amount of laboratory tests would be required for a typical window system. The combination of a wide variety of frames, sashes, glazing options and element types increases the total number of possibilities enormously. A high number of tests also means a high number of test specimen windows, with the corresponding consumption of materials. From the perspective of sustainability and resource efficiency, methods based on tabulated values and calculations are preferable.

4.3 EuroWindoor Proposal:

EuroWindoor advocates for **maintaining single essential characteristics with multiple equivalent assessment methods** clearly defined within the harmonised standard, in full compliance with CPR Article 5 and CEN Guide 36.

The harmonised standards should:

- Define each essential characteristic once, with clear performance criteria
- Specify multiple assessment methods (testing, calculation, tabulated values) as equivalent alternatives
- Include detailed conditions and applicability criteria for each method directly in the standard or in clear normative annexes
- Confirm that manufacturers have the right to choose the appropriate method in accordance with Article 5
- Prevent Member States from mandating specific assessment methods beyond what is legally permitted under the CPR

To ensure clarity and prevent misinterpretation, EuroWindoor proposes that the Standardisation Request tables include as a minimum explicit **comments specifying the conditions under which each assessment method is applicable**, providing a technical basis for appropriate method selection while preventing arbitrary requirements from customers or Member States.

This approach:

- Respects manufacturer choice as guaranteed by CPR Article 5
- Maintains market harmonisation and prevents fragmentation
- Reduces costs by allowing manufacturers to select the most appropriate and efficient method
- Preserves access for SMEs by ensuring less onerous methods remain viable
- Provides clear technical guidance on method applicability without creating regulatory barriers

EuroWindoor emphasizes that allowing Member States to choose or mandate assessment methods would directly violate CPR Article 5 and must be prevented.

5 Declaration of Component Values for thermal performance

5.1 Commission Position:

The Commission has stated that component-level characteristics (e.g. glass thermal values) require information transfer and should be declared as essential characteristics, not included in general product information. The Commission's reasoning is that characteristics placed in general product information cannot be regulated by Member States and that moving component

characteristics to general product information would block Member State regulation. Therefore, the Commission advocates for a **Declaration of Component Values for thermal performance** to enable accurate calculation of U_W -values for windows in actual sizes.

5.2 Challenge:

Member States do not regulate thermal performance requirements for windows and doors at the component level (e.g., glass U_g -values, frame U_f -values) but rather need them as input for calculation of actual window size and configuration.

Requiring component values (U_g for glass, U_f for frame, Ψ_g for edge seals) to be declared as essential characteristics creates several problems:

- Unnecessary regulatory burden: Component values are not the subject of building regulations; only the final U_W -value matters
- Competitive sensitivity: Declaring component values publicly reveals proprietary manufacturing details and material choices without regulatory justification
- Calculation complexity without benefit: Prescribing component-level declaration does not improve compliance verification, as Member States verify the final U_W -value, not individual components
- Inconsistency with regulatory practice: No Member State currently regulates glass or frame U -values independently; regulations specify whole-product thermal performance

The actual need is for manufacturers to provide sufficient information for specifiers and building designers to calculate the U_W -value for windows in actual project-specific sizes, but this is a general product information requirement, not an essential characteristic subject to Member State regulation.

5.3 EuroWindoor Proposal:

EuroWindoor proposes that **component values for thermal performance (U_g , U_f , Ψ_g) be included in the general product information section** of the Declaration of Performance and accompanying technical documentation, rather than declared as essential characteristics.

This approach is justified because:

1. Member States do not regulate component values: Building regulations specify performance requirements for the complete product (U_W), not for individual components. Therefore, component values do not meet the definition of essential characteristics subject to Member State regulation.
2. Component values serve calculation purposes: These values enable architects, specifiers, and building designers to calculate the thermal performance of windows in actual project sizes, which is a legitimate information need but not a regulatory requirement at component level.
3. Information transfer is ensured: Including component values in general product information ensures full transparency and traceability without creating artificial regulatory obligations where none exist in national building codes.
4. Alignment with market practice: This approach reflects how the industry and building professionals currently use component data — as calculation inputs for project-specific design, not as standalone compliance criteria.

EuroWindoor recommends that harmonised standards include a clear clause requiring manufacturers to provide component thermal values (U_g , U_f , Ψ_g , and relevant linear thermal transmittance values) in the general product information section, with standardized formats to ensure consistency and usability for calculation purposes. This maintains full transparency while correctly reflecting the regulatory reality that Member States regulate finished product performance, not component characteristics.

If the EuroWindoor proposal is not followed, the commission should for minimum add a comment to **specify that the intention of the component values** is "input values for calculation of U_W value for the actual window size and configuration used for energy frame calculation at building level".

6 Substances Declaration

6.1 Commission Position:

The Commission maintains a full list of approximately 250 **substances (174 EU LCI compounds + 83 CMR substances) that must be listed in the DoPC**. For Volatile Organic Compounds (VOCs), the full list remains in the Standardisation Request, but manufacturers are expected to declare only dangerous substances relevant to their markets, entering "null" for others. The Commission acknowledges that simplification would require a European-level system, which has been discussed for years without agreement. A second list exists for carcinogens, and the Commission is seeking simplification options.

6.2 Challenge:

The current approach to substances declaration creates significant practical and technical problems, particularly for external building components such as windows, external doors and roof windows:

- Insufficient testing capacity: Laboratories cannot measure all ~250 individual substances. Emissions measurements are typically conducted for substance groups or TVOC, not individual compounds. This is a structural limitation of current analytical capacity across Europe.
- Measurement at or below detection limits: External building components produce emissions that are at or below the detection limits of standard measurement methods (ISO 16000 series). Research projects have demonstrated that outdoor-facing products like windows show minimal to no measurable emissions under realistic conditions.
- Disproportionate 28-day testing requirement: The full 28-day chamber test protocol is technically and economically disproportionate for products where emissions are negligible. Scientific evidence supports early termination at day 7 where emissions are stable or declining, significantly reducing cost and laboratory time without compromising health protection.
- Double declaration with REACH for CMR substances: CMR substances are already regulated under REACH (Regulation (EC) No 1907/2006), which requires communication of hazardous substance content via Safety Data Sheets and SVHC notifications above 0.1% w/w as well as declaration for Formaldehyde when exceeding the threshold level. Requiring a separate emission declaration in the DoPC for the same substances constitutes a double regulatory burden without additional safety benefit, unless there is specific evidence that the substance emits to indoor air in relevant concentrations.
- Component-specific reality: Certain components, such as glass, have no emissions whatsoever, yet would theoretically be subject to the same declaration requirements as the complete product.
- Lack of regulatory demand: Member States have virtually no regulatory requirements for VOC emissions from external windows and doors. The only known national requirement (France), applies exclusively to frame profiles, not to complete external windows.
- Disproportionate burden: Requiring detailed substance-by-substance declarations for products with negligible or unmeasurable emissions imposes costs and administrative complexity without any corresponding safety, health, or regulatory benefit.

The current framework treats all construction products identically, ignoring the fundamental difference between **indoor products** (where emissions affect indoor air quality) and **external building envelope components** (where half of the emissions dissipate outdoors and large percentage consist of non-emitting materials (e.g. glass) and therefore pose no health risk).

6.3 EuroWindoor Proposal:

EuroWindoor proposes a tiered, **proportionate approach to substances declaration** that reflects the legal framework, scientific evidence, and technical reality of the industry:

Tier 1 — External building components (windows, external doors, roof windows):

External building components installed in the building envelope with primary exposure to outdoor environments should be exempted from VOC and CMR substance emission declaration requirements in the DoPC. Emissions from these products dissipate externally and do not contribute to indoor air quality. Where Member State requirements exist for specific sub-components (e.g. the French requirement for frame profiles), declaration should be limited to that specific.

Tier 2 — Internal products and indoor-facing components:

For products or components with genuine indoor air exposure (e.g. internal doors), a harmonised EU assessment and declaration system should apply, structured as follows:

- EU LCI compounds (Table 30 of draft SR DWS): Assessment using EN ISO 16000 series chamber testing with a priority subset of compounds defined in the Technical Acquis based on emission relevance and analytical feasibility. Room concentrations calculated using a standardised reference room. Results are preferably declared using a harmonised EU Class I / II / III system based on an additive R-value (ratio of declared concentration to EU LCI value), with an informative annex mapping to existing national schemes (French A+/A/B/C, AgBB).
- CMR substances (Table 31 of draft SR DWS): No separate DoPC declaration required where REACH obligations are met and no CMR substance is present above 0.1% w/w in any homogeneous material.

Tier 3 — Non-emitting components:

Components with no emissions (e.g., glass, metal hardware) should be explicitly excluded from substances testing and declaration requirements, with a simple declaration of "no emission" permitted.

This approach:

- Eliminates unnecessary testing costs for products with no health or environmental impact
- Avoids double declaration with REACH for CMR substances
- Focuses regulatory attention and resources on products where emissions are relevant (internal doors, indoor-facing components)
- Reflects scientific and technical reality regarding emissions from external building components
- Provides a workable, harmonised EU framework that bridges existing national schemes
- Reduces administrative burden without compromising safety or environmental protection

EuroWindoor is prepared to provide supporting data from emissions testing projects demonstrating the negligible or unmeasurable emissions from external windows and doors to substantiate this proposal.

7 Representative Product Type approach to AVS 3

7.1 Commission Position:

The Commission provided clarification concerning Assessment and verification system (AVS) 3 and the required "Certificate of Notified Body." Under System 3, the manufacturer must commission a **Notified Body to confirm the Product Type**. A Product Type can be validated for e.g. a "range of profiles," which corresponds to the "Model" designation in the product type definition. The Commission's intention is that every product falls under assessment so that no product types are arbitrarily created.

7.2 Challenge:

While the Commission's intention to ensure systematic and non-arbitrary product type definitions is understandable, the current framework creates significant practical challenges for the windows and doors sector:

- Product variability: Windows and doors are highly customized products with numerous variable characteristics (glazing types and configurations, hardware configurations, profile combinations), leading to potentially infinite of product variants even within a single manufacturer's portfolio.
- Declaration complexity: Requiring individual Product Type certificates and declarations for every possible variant would create an unmanageable administrative burden for manufacturers and Notified Bodies alike.
- Lack of comparability: Without a standardized approach to defining representative product types, declarations would vary significantly between manufacturers, making it difficult for specifiers, regulators, and market surveillance authorities to compare products meaningfully.
- Disproportionate costs: The current interpretation could require separate Notified Body certificates for minor variations that have no meaningful impact on essential characteristics, multiplying costs without improving safety or performance verification.
- Inconsistency with industry practice: The sector has long experience with representative testing and declaration systems which may not be based on declaration of worst case but is based on commonly accepted transparent rules for representative products given in harmonized technical specifications and which ensures comparability and a level playing field while maintaining practical feasibility.

7.3 EuroWindoor Proposal:

EuroWindoor proposes a **Representative Product Type approach** for characteristics requiring System 3 assessment, based on clearly defined reference elements and product systems.

EuroWindoor has prepared a separate detailed document outlining this proposal, which includes:

- Definition of product systems and representative product types for key essential characteristics
- Use of reference elements (e.g. reference sizes, standard glazing specifications, profile families) to minimize the number of required Product Type certificates while ensuring comprehensive coverage
- Clear rules for when variations require new Product Type certification versus when they fall within an existing validated product system
- Standardized declaration formats to ensure comparability across manufacturers
- Alignment with technical reality and established industry practice

EuroWindoor requests that the Commission review the separate detailed proposal document and engage in technical dialogue to refine and adopt this approach.

Should the Representative Product Type approach not be acceptable to the Commission, EuroWindoor reiterates its **request for reconsideration of AVS 4+** (manufacturer declaration with verification of software tool by Notified Body) for appropriate characteristics, as outlined in the separate joint industry position document. AVS 4+ would maintain third-party verification of performance while avoiding the disproportionate administrative burden of Product Type certification for highly variable products.

EuroWindoor emphasizes that the window and door sector requires a practical, technically sound framework that ensures compliance and market surveillance effectiveness while remaining economically viable for manufacturers of all sizes, particularly SMEs.

Reference:

- [EuroWindoor proposal for simplified declaration under AVS 3 \(May 2026\)](#)
- [Joint position on the use of verified software to implement the CPR in the Windows and Doors Sector \(January 2026\)](#)

8 Conclusion

EuroWindoor remains committed to constructive collaboration with the European Commission, CEN/TC 33 and all stakeholders in developing the Standardisation Request for windows, doors and related products. The observations and alternative approaches presented in this document reflect the industry's expertise and practical experience, offered to support the shared objective of creating a regulatory framework that is both legally sound and implementable.

We appreciate the Commission's openness to dialogue on these critical issues. EuroWindoor stands ready for further discussions to explore these proposals in detail and to work together towards solutions that serve both regulatory objectives and market needs.

Should the Commission find it beneficial, EuroWindoor would welcome the opportunity to arrange a dedicated meeting to discuss these points further.

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.