

EuroWindowor feedback to the draft delegated regulation on CWT for reaction to fire class A1

EuroWindowor is pleased to contribute to the feedback period on the draft supplementing Regulation (EU) 2024/3110 by laying down the conditions for Classification Without Testing (CWT) for reaction to fire class A1. We support the objective of ensuring continuity with the former system under Regulation (EU) No 305/2011 while avoiding unnecessary testing.

At the same time, we wish to highlight a technical inconsistency affecting glass products, in particular laminated glass with organic interlayers and to suggest an adjustment to the organic content criteria, making it more robust for such products.

1 Inconsistent treatment of laminated glass

Article 1 (fourth and fifth paragraphs) states that:

- “Products made from one or more than one of the materials listed in the Annex and at least one organic layer other than glue shall not be deemed to satisfy class A1, class A1_{FL} and class A1_L.”
- “Products made from one or more than one of the materials listed in the Annex in which organic material other than glue is not homogeneously distributed shall not be deemed to satisfy class A1, class A1_{FL} and class A1_L.”

At the same time, Annex, Table 1 lists under row 16:

- “Glass – Including heat strengthened, chemically toughened, laminated and wired glass.”

and the general note to Table 1 allows:

- “Materials listed in Table 1 ... to contain less than a maximum of 1.0% by weight or volume, whichever is the most onerous, of homogeneously distributed organic material.”

From a strict reading of Article 1, laminated glass incorporating PVB, EVA or similar polymer interlayers clearly contains an organic layer other than glue; such products seem to be outside the scope of the CWT decision and would not deem to satisfy class A1 without testing. However, the explicit mention of “laminated ... glass” in row 16, together with the generic 1.0% organic content allowance, may be interpreted by some market operators as implying that laminated glass products are, as a group, deemed to satisfy class A1.

Available test evidence compiled by CEN/TC 129 and Glass for Europe (position paper, April 2015)¹ indicates that laminated glass with polymer interlayers does formally not achieve Non-Combustible (Class A1) or Very Limited Combustibility (Class A2) because of strict requirements in EN 13501-1. Testing according to EN 13823 (SBI) can reach maximum class B.

On the other hand, some Member States (e.g. Germany) require the use of Non-Combustible (Class A1) or Very Limited Combustibility (Class A2) materials in external walls. At the same time the use of laminated glass is required in the external wall for safety reasons.

It is well known by the regulators that for laminated glass the required Reaction to Fire classes A1 and A2 cannot, strictly speaking, be achieved. However, this is deliberately accepted, with any potential risks arising from substandard workmanship remaining with the contractors.

To provide greater legal certainty, EuroWindowor proposes to modify the delegated regulation by refining the threshold of organic content.

¹ Classification of reaction to fire of glass products - Recommendation from Glass for Europe [\[Link\]](#)

2 Organic content threshold – refinement of the thickness/volume criterion

EuroWindowor recognises the intention to carry over from the previous acquis a very restrictive limit on organic content for materials deemed to satisfy class A1. However, for flat glass-based products, the combined “1.0% by weight or volume, whichever is the most onerous” formulation raises two concerns:

- For layered products such as glass with thin organic films or interlayers, a volume-based limit is effectively a thickness-ratio limit. The same organic layer can fall above or below the 1% volume threshold depending solely on the thickness of the glass panes, which is not directly related to its contribution to fire load.
- Reaction to fire performance is primarily governed by the total organic mass per unit area and its PCS (MJ/kg), as reflected in EN 13501-1 (criteria in PCS/m² and PCS/kg and the definition of non-substantial components in terms of surface density and absolute thickness), rather than by a simple ratio of layer thicknesses.

To make the rule more technically sound for glass products, including laminated glass, while keeping it very restrictive, EuroWindowor suggests the following refinement:

Proposal – Adjust the general note in Annex Table 1 on organic content

Amend the general note above Table 1 as follows (suggested changes in brackets):

“Materials listed in Table 1 are allowed to contain less than a maximum of 1.0% by weight [of **homogeneously distributed organic material**.

For glass (row 16), this limit should be interpreted in line with EN 13501-1 for non-substantial components, i.e. as corresponding to organic constituents with a maximum surface density of 1.0 kg/m² and a maximum continuous layer thickness of 1.0 mm.]”

and delete the words:

“[or volume, whichever is the most onerous,]”

The effect of this change would be:

- to base the limit on the physically more relevant organic mass per unit area, rather than on a thickness ratio, and
- to align the treatment of thin organic constituents in glass products with the established EN 13501-1 concept of non-substantial components, without opening the CWT route to laminated glass with functional polymer interlayers, which in any case remains excluded by Article 1 when an organic layer other than glue is present.

3 Conclusion

EuroWindowor believes that the above clarification would help ensure that the delegated act is interpreted consistently across Member States, avoids unintended default A1 classifications for laminated glass, and remains firmly grounded in the technical evidence available for glass products.



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