

Template for comments

Date: 27/08/2026	Contact (email/name) gs@eurowindow.eu	information DWS product requirements
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#	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 III, 1. Emergency release		The product requirement is applicable also to windows and hatches, but as the hardware that can prove compliance is only intended to be used on doors. The way to prove compliance for windows and hatches is missing and usually these products are used on secondary escape routes where the requirements are less strict than for doors. Therefore, there is the need for another way to show compliance or the products should be deleted completely.	Please modify. The following options exist: 1) delete the product requirement for windows and hatches. 2) establish different routes to prove compliance for windows and hatches than for doors,
		Annex III, 2. Child safety – opening restriction		The intended use “lockable products in openable products” is in misalignment with (c). There are basically two ways of preventing children from falling from height (both determined by hardware product): 1) Use a lockable device on the product – this will lead to the product shall prevent children from exiting (a) and be unlocked using a device (b) 2) Use an opening restrictor on the product – this will lead to the product shall remain closed or open to a limited extend when subject to external force and keep its function of preventing children from exiting (c).	Change the text in the following way: (1. Paragraph should stay as it is) It is applicable to openable windows and hatches intended to prevent children in falling from heights to the extent not covered by other Union legal acts. The product shall (a) Be unlocked using a device preventing children from exiting or (b) Remain closed or open to a limited extend when subject to external force and keep its function of preventing children from exiting; The hardware device shall be capable of deliver its function during the estimated service life and provide satisfactory durability as regards its lock function.

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		Annex III, 11. Prevention of trapping and blocking & 12. Operating gap		The trapping of fingers seems to be covered by both 11. and 12.	Please ensure there is no overlap in requirements

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.