

EuroWindoor feedback on Housing supply and affordability (regulatory simplification)

EuroWindoor appreciates the opportunity to provide feedback on the European Commission's planned Housing Simplification Package. We welcome the objective to reduce unnecessary regulatory burdens and administrative complexity in order to support housing supply and affordability, while fully respecting safety, social, environmental and climate goals. Simplification should focus primarily on improving and accelerating implementation, permitting and administrative procedures, rather than reopening the debate on recently agreed legislation.

As the European association representing the window, door and façade (curtain walling) sector, we see the effects of complex and sometimes overlapping rules on residential construction and renovation. Our sector delivers core building-envelope elements that are indispensable for energy performance, comfort, health and safety in homes. A targeted simplification package can make it easier and faster to deploy high-performance window and façade solutions in both new housing and renovation, especially for vulnerable households.

1 General comments

EuroWindoor strongly supports the Commission's intention to:

- map the cumulative impact of EU legislation and initiatives on housing supply and affordability and
- identify targeted simplification measures and best practices across the different policy areas relevant to housing.

We see three cross-cutting issues as particularly important for the Housing Simplification Package:

a) Interaction of building, product and environmental legislation

Housing projects are influenced simultaneously by building-level rules (e.g. the Energy Performance of Buildings Directive), product-level rules (e.g. the Construction Products Regulation and related standards), and environmental/chemical legislation (e.g. ESPR, REACH, BPR, PFAS restrictions, PPWR, EUDR). EuroWindoor has repeatedly underlined the need for close coordination and alignment between these frameworks so that they support each other and avoid overlaps or contradictions. The simplification package should explicitly look at strengthening the interaction and synergies from a housing-delivery perspective before deciding on possible reopening the underlying legislation.

b) Proportionality and SME-friendliness

Most window and door manufacturers in Europe are small and medium-sized enterprises. Complex, fragmented and changing requirements at EU and national level can absorb scarce administrative resources and delay housing and renovation projects, without necessarily improving outcomes. EuroWindoor has consistently called for technically sound, proportionate and workable rules for construction products and buildings, with particular attention to SME realities.

c) Focus on renovation and the building envelope

Given that the majority of the 2050 housing stock already exists, the simplification package should pay particular attention to renovation processes. Envelope measures – including replacement or upgrading of windows, doors and façades – are central to improving energy performance, comfort and indoor environmental quality in housing. EuroWindoor supports the Energy Efficiency First principle and has advocated for ambitious but realistic building-renovation policies that prioritise cost-effective envelope measures.

In line with a clear "renovate first" approach, the Package should support a hierarchy that prioritises the renovation, recovery and adaptation of existing buildings, followed by attic conversions, vertical extensions and other densification measures, while recognising that new construction remains necessary where housing needs cannot otherwise be met.

2 How EU legislation affects housing supply and affordability – observations from the window and façade sector

The call for evidence invites examples of how EU legislation impacts housing supply and affordability. From the perspective of window and façade manufacturers and installers, we would highlight the following patterns:

a) Complex interplay between EU level requirements and national implementation

- EU legislation (for example EPBD, EED, CPR, ESPR, environmental and chemicals legislation) sets important common objectives and frameworks.
- However, when these are transposed or implemented through multiple layers of national, regional and local rules – sometimes with so-called “gold-plating” – housing and renovation projects can face long and unpredictable processes for permitting, design approval and access to financial support.
- For standard envelope measures such as window replacement, differences between EU-level concepts (e.g. minimum performance levels, information requirements) and national implementation can result in multiple redesigns, repeated documentation and project delays.

For example, in Germany, access to subsidies for publicly supported new housing requires a specific sustainability class under QNG certification – entailing additional national documentation on greenhouse-gas potential, hazardous-substance avoidance, sustainable material sourcing and accessibility that goes beyond EU-level requirements. For manufacturers and project developers, this creates significant additional verification effort in terms of both time and cost.

b) Multiple, partly overlapping information and documentation requirements

- Product-related requirements under CPR, ESPR and related digital initiatives (e.g. Digital Product Passport) increasingly involve detailed technical and environmental data. In parallel, building-level tools such as Energy Performance Certificates, renovation passports and national support schemes require their own data sets.
- Without careful coordination, manufacturers and installers may need to provide similar information several times in different formats to different systems, adding cost and increasing the risk of inconsistent data. EuroWindoor has already stressed the need to align information requirements and digital tools across legislation, in particular between the CPR, ESPR and related product-data initiatives.

c) Fragmentation across Member States

- While housing policy is primarily national, many EU-level rules leave significant flexibility in implementation. This is understandable, but it can result in very different requirements and procedures between Member States (and sometimes within them), even when based on the same EU legislation.
- For window and façade manufacturers and installers active in several countries, this fragmentation increases compliance and administrative costs and can discourage cross-border activity, which in turn reduces competition and choice in local housing markets.

d) Skills and capacity constraints

- The housing affordability crisis is also driven by limited capacity in the construction and renovation value chain. EuroWindoor already monitors EU-level skills initiatives relevant to fenestration manufacturing and installation and sees workforce shortages as a key bottleneck for scaling up renovation.
- Where regulatory frameworks are complex and change frequently, companies must dedicate scarce expert time to compliance rather than training new workers or improving site productivity. Simplification and clear, stable rules can therefore indirectly support skills development and capacity expansion.

3 Practical suggestions to reduce delays and costs while respecting wider policy goals

Responding to the call for concrete proposals, EuroWindow suggests the following areas where the Housing Simplification Package could deliver real benefits for housing projects involving windows, doors and façades:

a) Improve coordination between building- and product-level legislation

EuroWindow recommends that the mapping and subsequent measures:

- Identify and streamline the implementation of EPBD, EED, CPR, ESPR and related legislation as they apply to housing renovation and new housing, with a special focus on transparent building elements (windows, doors, curtain walling, rooflights).
- Ensure that product-level obligations (under CPR/ESPR and DPP) and building-level tools (EPCs, renovation passports, national renovation plans, BIM) use compatible and, where possible, shared data structures and definitions, in order to reduce duplicate reporting and conflicting requirements.
- Introduce a simplified digital procedure under AVS 3 (see CPR, Annex IX), e.g. by implementing act, in which a validated software tool replaces Notified Body verification for individual product types and their corresponding performance characteristics, reducing capacity-related bottlenecks.
- Clarify the division of responsibilities between product manufacturers, installers and building owners for providing and updating information, so that obligations are manageable and appropriately allocated.

b) Streamline permitting and approval processes for standardised residential renovation measures

Windows, doors and façades are often part of relatively standardised renovation packages, especially in multi-family housing. EuroWindow suggests that the Housing Simplification Package:

- Promote proportionate permitting and approval procedures for standard envelope renovations, for example by:
 - allowing simplified or fast-track treatment for window and façade replacement that does not alter the building's structural concept or urbanistic parameters;
 - encouraging digital one-stop shops where project promoters can submit all required documents once for both building- and product-related checks.
- Streamlined digital permitting for standardised interventions — including attic conversions, vertical extensions, and office-to-residential conversions — can rapidly unlock housing capacity without additional land take by expanding supply within existing buildings, often through rooflights, new windows, and upgraded façades.
- Collect and disseminate best practices from Member States and cities that have successfully simplified permitting for renovation (e.g. model forms, digital workflows, predefined technical solutions for window replacement in typical housing typologies).

c) Rationalise information and documentation requirements

To reduce administrative and reporting burdens without weakening protection levels, EuroWindow recommends that the simplification package:

- Maps all EU-driven information requirements that affect housing projects, including those for energy performance, environmental performance, chemicals, circular economy and public procurement.
- Identifies opportunities to:
 - eliminate duplicate data requests;
 - harmonise terminology and performance indicators across instruments;
 - promote interoperability between databases and registries.
- Promotes simple, transparent documentation formats that are accessible for SMEs while still delivering the information needed by authorities, financiers and occupants.

d) Support productivity and skills in the construction and renovation ecosystem

Targeted support on skills and productivity can amplify the benefits for housing delivery. EuroWindoor suggests that the initiative:

- Recognises window, door and façade manufacturers and installers as a priority segment within the construction skills agenda, including under the EU Skills Pact and related programmes.
- Connects simplification with training and guidance, for example by:
 - developing simple technical guidance and templates for compliant window, door and façade renovation in different climatic conditions;
 - supporting training modules for SMEs on how to navigate simplified permitting and documentation processes;
 - encouraging recognition of prior learning and cross-border mobility for skilled workers in the building-envelope segment.

4 Suggestions for increasing productivity in construction and renovation

The call for evidence also invites proposals to increase productivity. From our sector's perspective, the Housing Simplification Package could:

- Promote standardised technical solutions for common housing typologies (for example, "renovation kits" for windows, doors and façades in typical multi-family houses – for instance an integrated package combining a high-performance window with built-in external solar shading, a decentralised ventilation unit and smart-home control, delivering energy optimisation and healthy indoor-air quality in a single pre-configured solution –), accompanied by clear, harmonised guidelines that can be quickly approved by authorities.
- Foster digitalisation across the value chain, including:
 - interoperable digital product data for windows, doors and façades (aligned with ongoing work on DPP, BIM and data dictionaries),
 - digital permitting, inspection procedures and planning tools as key to better plan window placement in buildings for improved IEQ,
 - simple interfaces between product data and building-level tools and certificates.

These measures can shorten project lead times, reduce errors and rework and make it easier for smaller companies to participate in housing projects.

5 Conclusion

EuroWindoor welcomes the Housing Simplification Package as an opportunity to reduce unnecessary burdens that slow down urgently needed housing construction and renovation, while maintaining strong protection of safety, health and the environment.

We encourage the Commission to:

- focus the Package firmly on implementation, permitting and administrative simplification
- take a holistic view of how EU-level rules interact at project level in the housing sector,
- pay particular attention to renovation and to the building envelope,
- ensure that simplification measures are technically sound and workable for SMEs and
- link legal simplification with practical support on skills, digitalisation and standardised solutions.

EuroWindoor would highly appreciate the Commission's consideration of the perspectives set out above and remains at your disposal for further dialogue, including by providing more detailed examples and case studies through our national member associations.



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 21 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.

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