



Inception Impact Assessment for the CPR Review

EuroWindowor appreciate the opportunity to provide feedback to the inception impact assessment on the review of the Construction Product Regulation. The European window, door and façade sector is highly dependent on a well-functioning internal market and with that a well-functioning CPR.

EuroWindowor believes CPR in present format is overall well-functioning and therefore we are leaning towards Option A – Baseline scenario as defined as Option I in 2018. EuroWindowor is of the opinion that the insufficient quality of harmonized standards highlighted in the impact assessment is due to the fact that those standards being evaluated by the Commission now have been written before new guidance on requirements resulting from James-Elliott case have been provided. A revision of the CPR is not necessary to remedy this situation. This can be done by guidance and soft law.

EuroWindowor agrees that to be able to transform also the construction sector into a more circular economy, rules have to be set how to deal with recycled and reused products without creating an unfair competition and allowing unsafe products on the market. This can however be handled by amending Annex V in terms of defining rules for the Factory Production Control of the economic operator for these products and by taking these products into account in standardization requests. EuroWindowor agrees to the wish of the European Commission to strengthen and streamline the Notified Bodies and their designation system as well as the market surveillance. EuroWindowor is though of the opinion that much could be done within the present framework of the CPR through guidelines, checklists and training.

EuroWindowor does see some rules in CPR that could work better by being revised, like removing the requirement of duplication of information between the CE marking and the declaration of performance (DoP) and redefining what is meant by “exhaustiveness”. However EuroWindowor is of the opinion that the list of topics the Commission would like to change under Option B goes far too long. EuroWindowor does not agree that all those listed topics would necessarily improve the functioning of the CPR, but will on the other hand introduce changes for market participants. Changes in the legislative framework will always require investments by the industry to change their present setup to ensure continuous compliance with the rules. EuroWindowor can for these reasons not support Option B as defined by the Commission and as a consequence of this also not Option C or D.

EuroWindowor made already proposals for improvement in its [Position on the Review of CPR \(November 2019\)](#) and is available for further discussion of the views presented.

About EuroWindowor AISBL – EuroWindowor 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 18 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.

EuroWindowor AISBL
Schuman Business Center, 40, Rue Breydel, 1040 Bruxelles / Belgium
or
Walter-Kolb-Str. 1-7, 60594 Frankfurt am Main / Germany
Internet: www.EuroWindowor.eu

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