



## **EuroWindoor position on principles of good cooperation and improvement of effectiveness of standardization for CPR**

EuroWindoor strongly supports the basic idea of the Construction Products Regulation (CPR) and of having harmonized product standards which provide a common European technical language. EuroWindoor wants to remind that the industry and other relevant stakeholders for many years have invested a lot of time and money to develop high quality standards within the rules and framework provided.

EuroWindoor acknowledges that we do not live in a static world and that some rules and procedures had to be changed with the shift from CPD to CPR and as an outcome of the European Court of Justice judgement in case C-100/13. From the point of view of the industry participating at CEN/TC level in the actual development of the standards the standardisers do not feel sufficiently trained in how to implement these changes correctly. As a consequence the industry is now seeing a lot of its hard work being blocked in the system without a clear picture what it is supposed to do differently when other standards are being developed or revised to avoid these ending up also as being blocked.

EuroWindoor can only support the conclusion of the recently published report from the European Commission COM(2016) 445 final on the implementation of Regulation (EU) No 305/2011, that *“there is potential for a quicker and a better streamlined standardisation process with standards responding better to the needs of their users through a close and efficient collaboration between CEN, Member States, the industry and the Commission”*<sup>1</sup>. As an input to this process EuroWindoor has developed a proposal how EuroWindoor envisions the interaction of actors during standardisation process in the future, see Annex to this document.

### **EuroWindoor proposes:**

- To have in the Technical Committee (TC) an unambiguous defined task through the mandate and answer to the mandate/standardisation request together with known templates and European Commission (EC) related delegated acts in one approved complete document before the drafting process of the standard begins. This is required to prevent a costly rejection/revision in a late stage of the drafting process or blockage in the EC after publication of the standard by the National Standardisation Bodies.
- To ensure involvement of CEN Consultants already at Enquiry level to ensure possibly required changes are handled and incorporated before the final draft goes into Formal Vote procedure. This would prevent too many changes at the very final stage in the drafting process where normally only the Convenor of the Working Group or Task Group is involved as the other experts expect to have finalized their work and most likely have moved on to the next pending standardisation project.
- To encourage Member States to provide detailed comments on the content linked to Annex ZA in the enquiry phase to provide the TC with the best possible opportunity to adjust the draft at an early stage so the final published version is fit for purpose in each Member State in relation to the national building legislation.

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<sup>1</sup> Citation from the CPR report



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**About EuroWindow AISBL** – EuroWindow AISBL was recently 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.

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## Annex: Draft Citation road map - interaction of actors during standardisation process



EuroWindoor position on Improvement of standardization for CPR, 7<sup>th</sup> October 2016

Phase	Stage Code	CEN/TC	CCMC	European Commission (EC)	Member States (MS)
Development / revision of mandate <sup>2</sup>	00.60	Discussion (e.g. stakeholder(s) needs) for revising/developing a hEN	Informing related CEN/TC and asking for comment on draft mandate	Introduction of draft mandate with indication of the origin for characteristics after consultation of MS	Give frequent updating to EC when there is a need for a mandate or change of mandate
Publication of mandate	00.60	Informing TC delegates	Allocating the mandate to the related CEN/TC	Publication of mandate	
Preparation of Answer to the Mandate	00.60	- Drafting and agreement within CEN/TC of scope - Preparation of the answer to the Mandate - Sending answer to the mandate to CCMC	Informing EC in due time	Confirms Mandate & Answer to the Mandate given by CCMC in due time	
Official launch of candidate harmonised standard development and revision	10.99	- Informing CCMC on new WI - TC to inform the related WG	- Fix the templates edition which need to be followed (Clause 6, Annex ZA) - Mandate, Answer to the Mandate and EC related delegated acts to be followed are settled in one complete document. - Informing EC		
Development of the prEN		- Information from CCMC and EC taken into account. - If needed a clarification meeting with CCMC and/or EC is held. - Sector Group of Notified Bodies relevant Position Papers is taken on board and afterwards either included or deleted	Support of TC for questions related to the mandate and procedures	Support of CCMC for questions related to the mandate and procedures	MS are invited to send experts to CEN/TC
Agreement to launch CEN Enquiry	40.20	- Approval of justification for New classes & thresholds - Approval for launching CEN Enquiry - Informing CCMC for both prEN and New classes & thresholds document)	Start Enquiry process		
CEN Enquiry			- CEN consultant gives advice formally CEN/TC for the content of the prEN and the possible justification on New classes & thresholds documents - CCMC informs EC if there is a need to define New Classes & Thresholds	Process Delegated act for New Classes & Thresholds	MS provide inputs to the content linked to Annex ZA (detailed comments with justifications on "fit for purpose" in each MS) based on the set Mandate and Answer to the Mandate
Comments from CEN Enquiry are dealt with and answered	40.65	- If needed a clarification meeting with CCMC and/or EC is held. - Informing CCMC with revised prEN	- CEN consultant prepares a report to EC with positive assessment - Informing EC	- EC assesses the revised prEN and provides positive assessment - EC informing MS about actions taken by the CEN/TC	- Confirmation for no objections by any MS (e.g. on Advisory Group level)
Agreement to launch Formal Vote	50.20	Approval for launching Formal Vote	Informing EC on launching FV	OK by EC that candidate hEN will be cited in OJEU with positive result	
Formal Vote and publication of EN	50.60...65.62		Positive result informing EC and TC	Standard is cited in OJEU	

<sup>2</sup> Standardisation request is not used in this table for simplification. It might be used equivalent to mandate.