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European Parliament
Committee Internal Market and Consumer Protection (IMCO)
Rapporteur Mrs. Catherine Neris
Committee Industry, Research and Energy (ITRE)
Rapporteur Mr. Den Dover

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EuroWindowdoors position on the draft report on the CPR proposal from reporter Catherine Neris (6.10.2008)

Dear Mrs. Neris, dear Mr. Dover,

EuroWindowdoor is an umbrella organization of the European associations of fenestration and door sector FAECF, FEMIB, EPW and UEMV for the three frame materials metal, wood and plastic and the infill material glass. On a European scale EuroWindowdoor represents more than 50.000 companies and more than one million employees. The European window industry is mostly an industry which consists of small and medium sized companies, with local employees. In view of the construction supply chain, the window industry supplies local construction companies with building components and is thereby a part of a local supply chain with local employment.

EuroWindowdoor considers the Construction Products Regulation to be a very important initiative for the achievement of economic success in the EU. It may be regarded as a common language allowing all partners in business to co-ordinate their activities and understand one another. For EuroWindowdoor it is obvious that we should strive for a better and more transparent way of working in the building industry, but we see some of the proposed amendments in contradiction to this aim.

EuroWindowdoor disagrees with the proposed amendment 17. Most of the windows are manufactured and installed by the same company. It is always possible to deliver frame and glass separate to the building site to be assembled there. Are both cases excluded from CE marking according to proposal (b) "any product manufactured on and/or off site and incorporated into a work without being placed back on the market"?

EuroWindowdoor considers this as the common understanding and all of our products will be excluded from CE marking. That is not the aim of the CPR.

EPW: European Plastic Window Association
FAECF: Federation of European Window and Curtain Wall Manufacturers' Association
FEMIB: Federation of the European Building Joinery Associations
UEMV: European Glaziers Association

CE marking might not be applicable only for individual one off products which are constructed for a specific project; this does not include different sizes of the same basic product or the final assembly on site as mentioned before.

⇒ We demand that “excludes” for proposal (b) may be replaced by “includes” or to clarify these specific cases and the products concerned.

Amendment 16 weakens the intentions of the CPR in a very fundamental way. The manufacturer has to comply with building regulations and this is much easier with CE marking than in any other way. Amendment 16 article 2 point 3 creates the possibility of adding extra national requirements or national marking and that is exactly what we should not do in a common European market.

That's not acceptable and opens both a door for a revival of national marks but also a Pandoras box, as this can hit us back 20 years and national marks might even overrule the CE. The Member State must table all requirements so they can be transferred in "essential characteristics" for the product in the product standard, no extra testing and certification in the country on top of the CE.

⇒ We propose to delete amendment 16 without any substitute.

We also discussed Amendment 26, where the national additional requirements are addressed and the Parliament is not open to come back on this, as we feel, although the “good package debate” hampers them. The CE marking shall be the only marking which attests conformity of the construction product with the declared performance on a certain characteristics in accordance with Community harmonisation legislation. Member States shall introduce additional national measures into the relevant harmonised specifications.

⇒ Best would be to step back to the Commission's original wording as this is crystal-clear and says "stop" to national extras.

We would be grateful if you would take note of our concerns which we would be happy to discuss further at the appropriate time.

Yours sincerely

EuroWindoor
The Chairman



Franz Hauk