

## **Position on 1<sup>st</sup> draft CEN/TR 00351003 "Evaluation of a horizontal approach to assess the possible release of dangerous substances from construction products in support of requirements from the CPD"**

EuroWindoor fully agrees to the essential requirements of the CPD. Therefore we assessed the 1<sup>st</sup> draft CEN/TR 00351003 and found as main principle for determination of possible release of dangerous substances that usually whole products should be tested with the same standard preferably to all release mechanism and factors. We assume this is the most expensive way and the strongest possible burden for industry and especially the numberless SME. We estimate that many manufacturers will not be able to fulfil all the testing and that the development of new products will be hampered significantly which causes in a decrease of the markets. European products which are worldwide leading products today may lose their status.

We like to point out some principle arguments for complex products using windows as example. Windows do feature for infinite possibility of combinations from different framings and infills, in different types and sizes as well as any configuration and segmentation of the product. The following suggestions shall give input to a more appropriate approach with less effort but the same benefit:

- Product testing should not be necessary if safety reports from REACH exist for all materials.
- Before testing there should always be an evaluation of the hazard for all materials and components and their volume in each element.
- Testing should only be done in case release of dangerous substances is expected in a relevant amount or on voluntary basis if not.
- Testing of materials or components should be preferred to testing the full element (product). This demand is supported by the following arguments:
  - If the window is tested as a full element it will not give us any result of each part of it. There will be a result in total, but it will not offer necessary data part by part.
  - If the window is tested as a full element and the result shows release of dangerous substances, we will not know from which part of the window it results. Therefore the manufacturer of the window cannot react and easily exchange the necessary part.
  - As a result, the full element would have been to be tested over and over again to get sufficient results. This causes lots of testing and will end in high cost for the manufacturer. This will be a financial burden as the manufacturers are mostly SME's.
  - In testing the full element the producer will be made responsible for release of parts he has not produced. E.g., if a window manufacturer buys the gaskets from another company, he will not know if the gaskets are modified and therefore he does not know the different releases of the component.
  - If the manufacturer changes a component (e.g. gasket) from one to another supplier, a full element test will be worthless. On the other hand changing parts with a REACH report into another with report will be much easier.

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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

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