

EuroWindoor Adhoc group "Position Paper CPR" Video Conference on July 5th, 2019

Purpose:

To discuss the preparation of necessary documents concerning activities or problems with CE-marking and Standardisation.

Participants:

Gerrit Buitenhuis, Karsten Duer, Nicolas Dupin, Britta Tipsmark Hougaard, Frank Koos and Herman Looghe.

Documents:

EW(19)09 - Notes of EuroWindoor meeting with Tapani Mikkeli, DG GROW on April 25th, 2019
EW(18)38 - Letter to TC33 on draft Standardization request, revision of the Mandate M/101
EW(16)18final - EuroWindoor position on principles of good cooperation and improvement of effectiveness of standardization for CPR
Paper prepared by the Industry Advisory Forum of CEN-CENELEC on CPR

Result of the meeting:

The participants agree to work on the following items:

1 Revision of the CPR

EuroWindoor gave an answer in the Open Public Consultation on Review of the CPR (EW(18)01final) which is still valid.

There are some additional ideas and arguments available (e.g. from Karsten Duer) which can also be used for giving input in the process of revising CPR. This includes the improvement of the harmonisation procedure. EW(16)18final does have a similar approach, but needs to be adapted to the Regulation (EU) No 1025/2012 on European standardisation.

A staff working draft of the EC on revising the CPR is expected to be available after the summer break. This needs to be assessed and EuroWindoor will have to publish a new position paper taking the proposal into account.

- ➔ Nicolas Dupin volunteers for drafting some text to be used in a position paper on revision of the CPR for discussion in the next meeting.

2 Draft Standardisation Request (S_{req}) for CEN/TC 33 (June 2019)

Mr. Bedotti sent a new template for a S_{req} to CEN/TC 33 and asked Frédéric Wielezynski to complete the document by transferring content of the paper developed together with Tapani Mikkeli. End of May the WG Convenors were involved by the TC secretariat to give input until beginning of June. There are major deviations to what we had in February after the meetings with Mikkeli. A lot of the developed input is lost, because it is missing in the template.

There was also a short discussion in the CEN/TC33/WG1/TG6 for merging EN 16034 meeting on 13 June 2019. The template needs to be adapted.

According to a message from Frédéric Wielezynski to Karsten Duer, Britta Tipsmark Hougaard and Frank Koos will be asked officially next week to propose modifications to the template.

- ➔ Britta Tipsmark Hougaard and Frank Koos will draft modifications to the template before July 19th. If this will not be accepted by Mr. Bedotti, a formal letter to the EC shall follow after the holidays.



3 Outstanding citation of hEN in EUOJ

There are rumours that perhaps EN 14351-2 will not be cited until November and perhaps the coexistence period for EN 16034 and EN 14351-1 will not be extended. This is in contradiction to what Mr. Mikkeli told EuroWindowor in April (EW(19)09). EuroWindowor needs clarification.

- Britta Tipsmark Hougaard will prepare a message which EuroWindowor can send to Mr. Mikkeli next week possibly with copy to Mrs Raffaelli. If the content of the rumour is confirmed by Mr. Mikkeli, Britta Tipsmark Hougaard drafts a position paper after the holidays which can be addressed to SCC members.

4 CE marking for “incomplete windows and doors”

Gerrit Buitenhuis gives examples like finalisation of products on site and delivery of door set without cylinder where it is not completely clear, if the “incomplete” products are placed on the marked or not and have to be CE marked or not.

There are different interpretations of the definition in CPR Article 2 No 16. ‘making available on the market’ and 17. ‘placing on the market’ available even there is a FAQ from EC available. EuroWindowor may state its opinion before asking official bodies for clarification.

- Gerrit Buitenhuis volunteers for drafting some text to be used in a position paper for discussion in the next meeting.

Next meeting:

Video Conference on Wednesday, August 26th, 2019 from 10.00-15.00 h.

Text proposals are to be circulated some days before giving time to the participants for preparation.

July 2019
Frank Koos