



## Feedback on “Inception impact assessment on revision of the Machinery Directive”

EuroWindowor appreciates the opportunity to give feedback to the inception impact assessment on revision of the Machinery Directive 2006/42/EC.

EuroWindowor represent the interest of the European window, door and façade (curtain walling) sector and has in this role previously provided guidance to the sector for “Power operated Windows” in EuroWindowor Guidance Sheet KB.01: 2017-07 how to comply with requirements of Machinery Directive additionally to those of Construction Product Regulation (2011/305/EU).

EuroWindowor is also involved in the scoping of the Ecodesign preparatory study for Building Automation and Control Systems (BACS) and the technical study on the Smart Readiness Indicator (SRI) for buildings, because of the following power operated products manufactured and distributed by the European window, door and façade industry:

- Smart windows
- Smart doors
- Smart blinds & shutters
- Automatic sliding or revolving doors

We support the option 2 (“aligning the Directive with the ‘new legislative framework’”) as most appropriate to proceed. We see the need of changes to the scope and definitions especially clarification how to distinguish between partly completed machinery and (completed) machinery. A simplification of responsibilities and required documentation should be implemented for the tasks of different participants in the supply chain. The attached annex shows the complexity for power operated windows in different distribution routes, which requires from several participants the same task and documentation.

The modification from paper work to digital documentation is overdue and highly recommended. We need a procedure, which is completely in line with CPR and the Delegated Regulation (EU) No 157/2014 on the conditions on making the declaration of performance of construction products available on a website.

EuroWindowor is interested in the further proceeding and is available for further communication.

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**About EuroWindowor AISBL** – EuroWindowor 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 16 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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## Plan of power-operated window documentation

Responsible		Documents
Owner		<ul style="list-style-type: none"> <li>• Usage specifications</li> <li>• Building permit</li> <li>• Authority constraints</li> </ul>
Planner		<ul style="list-style-type: none"> <li>• Usage concept</li> <li>• Risk assessment</li> <li>• Tender specifications of technical / structural requirements</li> </ul>
Window manufacturer	without drive (not a machinery)	<ul style="list-style-type: none"> <li>• Technical documentation to EU CPR (internal)</li> <li>• Window user information</li> <li>• Declaration of performance for windows to CPR and EN 14351-1 Annex ZA</li> <li>• CE marking of window (CPR)</li> </ul>
	with drive (partly completed machinery)	<ul style="list-style-type: none"> <li>• Technical documentation to EU CPR and Machinery Directive (internal)</li> <li>• Window user information</li> <li>• Declaration of performance for windows to CPR and EN 14351-1 Annex ZA</li> <li>• CE marking of window (CPR)</li> <li>• Declaration of incorporation of partly completed machinery, assembly instructions</li> </ul>
	with drive and control unit (completed machinery)	<ul style="list-style-type: none"> <li>• Technical documentation to EU CPR and Machinery Directive (internal)</li> <li>• Risk assessment for the intended use (internal)</li> <li>• Window user information and operating manual</li> <li>• Declaration of performance of power-operated windows to CPR and EN 14351-1 Annex ZA, ZB, ZC and ZD as well as to EN 12101-2, if the window classify as "natural smoke and heat exhaust ventilators" (NSHEV) covered by that standard.</li> <li>• CE marking of window to EU CPR and Machinery, EMC and LVD Directives</li> </ul>
Drive manufacturer and control system manufacturer		<ul style="list-style-type: none"> <li>• Product user information</li> <li>• Safety instructions</li> <li>• Declaration of incorporation of partly completed machinery, assembly instructions with reference to EN 60335-2-103</li> <li>• Declaration of conformity and CE marking of the product (EMC and LVD)</li> </ul>
Installer	Completion of window to make up a fully functional power-operated window; putting into service	<ul style="list-style-type: none"> <li>• Electrical wiring diagram</li> <li>• Handover certificate</li> <li>• User information / operating manual</li> <li>• CE marking and declaration of conformity to Machinery Directive</li> <li>• Risk assessment for verifying compliance with the specifications (e.g. checklist)</li> </ul>
	Putting power-operated window into service (completed machinery)	<ul style="list-style-type: none"> <li>• Electrical wiring diagram</li> <li>• Handover certificate</li> <li>• Handover of manufacturer's documents (declaration of performance, CE marking of power-operated window, user information,...)</li> <li>• Risk assessment for verifying compliance with the specifications (e.g. checklist)</li> </ul>
Operator		<ul style="list-style-type: none"> <li>• Maintenance documentation</li> </ul>

Source: EuroWindoor Guidance Sheet KB.01: 2017-07 "Power operated Windows"