

## **EuroWindoor position to the request for a new extension of the coexistence period for EN 14351-1 of one year (CEN TC 33 draft resolution 637/c 2008)**

**EuroWindoor members agree to vote against the resolution and ask the voting members of the national mirror committees also to reject the CEN TC 33 draft resolution 637/c 2008.**

The CEN TC 33 Draft resolution 637/c 2008 (CEN-TC033 N2146) requests a new extension of the coexistence period for EN 14351-1 of one year. This is justified with the needed time to implement the amendment /A1. The deadline for voting by the national standardisation bodies is 30 September 08.

EuroWindoor discussed the situation deeply and found following arguments.

Pro	Con
<ul style="list-style-type: none"> <li>• More time to finalize the ITT (especially for doors)</li> </ul>	<ul style="list-style-type: none"> <li>• No real harmonisation until coexistence ends</li> </ul>
	<ul style="list-style-type: none"> <li>• The content of amendment /A1 is the same as it is done up to now, but more clear and doesn't need any extra time</li> </ul>
	<ul style="list-style-type: none"> <li>• More legal safety for the manufacturers with the amendment in force (e.g. reference to EN ISO 10077-1: 2006-12 and situation for power operated pedestrian doors)</li> </ul>
	<ul style="list-style-type: none"> <li>• The request is against all efforts which were made by many manufacturers up to now to be ready in time</li> </ul>

The European window and door sector will be ready for CE marking until 1 February 2009. There are many appropriate solutions for industrial and hand craft manufacturing available. The request gives a wrong sign for the future. It helps only the manufacturers which did not care about the preparation on time. A further extension of the coexistence period for 1 year will not give any pressure to those manufacturers, which did not do their homework up to now and the situation will be the same in one year as today.

⇒ As result of the discussion EuroWindoor members agree to vote against the resolution and ask the voting members of the national mirror committees also to reject the CEN TC 33 draft resolution 637/c 2008.

## About EuroWindoor

EuroWindoor 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 EuroWindoor 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.

Frankfurt, 17 September 2008

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

EuroWindoor - The General Secretariat,  
c/o UEAPME, 4, Rue Jaques De Lalaing, 1040 Bruxelles / Belgium  
or  
Walter-Kolb-Str. 1-7, 60594 Frankfurt am Main / Germany  
Internet: [www.EuroWindoor.org](http://www.EuroWindoor.org)