

The application of the verification procedures under the Construction Products Regulation should be made simple

Initial inspections in AVS3+ risks disrupting the building glass market

Glass for Europe welcomes the recent EU Construction Products Regulation revision (CPR 2024)ⁱ as part of a multifaceted process to ensure that the EU construction products ecosystem meets today's and tomorrow's needs.

One facet of the process involves the Assessment and Verification Systems (AVS) applied to all types of characteristics declared in the Declaration of Performance and Conformity (DoPC) of products. These AVS will be instrumental in enabling the marketing of building glass products. They should **give confidence to consumers about the compliance of the information provided** in the DoPC and **enable fluid data validation rules to ensure the affordability and availability of glass products**.

Glass for Europe wishes to raise serious concerns about recent projects related to the “AVS 3+” procedures to validate environmental declarations in DoPCs. In particular, the *initial inspection of the manufacturing plant*ⁱⁱ would entail substantial costs and supply disruptions if implemented as outlined in documents published by the Group of Notified Bodies (GNB).

In their revised guidanceⁱⁱⁱ, the GNB-AG indicates that:

- Inspections shall be carried out as on-site audits.
- All locations at which significant manufacturing processes take place shall be subjected to the initial inspection.
- Multisite sampling is not an option.

GNB-SH03 has adopted this procedure^{iv} for the initial inspection in “AVCP system 3+”, for products regulated under the CPR of 2011^v. It could therefore be expected that under the similar AVS 3+:

- Every plant producing a product type will need to be visited in person, once, by a Notified Body.
- For every new product type, a new visit, on each production site, will be requested.
- Every visit will need to be reiterated when changes in a product's environmental characteristic occur (if this results in a new product type).

This paper outlines why such a procedure should be avoided and offers suggestions for more appropriate inspection methods.

Glass for Europe is the trade association for Europe's flat glass sector. Flat glass is the material that goes into various end products, primarily in windows and facades for buildings. Glass for Europe brings together multinational firms and thousands of SMEs across Europe to represent the entire flat glass value chain. It comprises flat glass manufacturers, AGC Glass Europe, Guardian, NSG-Group, Saint-Gobain, and Şişecam and works in association with national partners gathering glass processors and transformers.

Generalising on-site initial inspections in AVS 3+ is problematic

The EU flat glass sector involves more than 40+ manufacturing plants (glass melting) that supply 1000+ transformers. A single manufacturer can offer tens of thousands of product references and potentially as many product types. Considering this, a strict application of the GNB procedures mentioned above would be very problematic, as a very high demand for inspections would arise whenever a new harmonised product standard (under the CPR 2024) is published.

Since only a limited number of organisations will be able to act as Notified Bodies, this high demand will likely lead to high costs and long delays. This could also delay the commercialisation of innovative solutions, e.g., glass that enables higher energy efficiency in buildings or which embodies less carbon. Then, such disruptions would be reported on the construction sector and its customers throughout the EU.

Enforcing systematic on-site initial inspections would be damaging and dismissive of the main benefits of process standardisation and digitalisation within the flat glass sector.

On the one hand, factories producing identical products, e.g. insulated glass units, have a broadly similar process and functioning when it comes to assessing product performance. In such a case, it seems unnecessary to conduct initial audits across all plants, as one plant is representative of all others.

On the other hand, manufacturers have made significant advances in digitising their monitoring systems, notably to efficiently meet existing sustainability standards and EU environmental reporting requirements. Those advances mean that on-site audits are very rarely required and would amount to sitting in a meeting room to review data through IT tools. This progress in digitalisation, which is itself encouraged by the CPR 2024 (e.g. through the Digital Products Passport), should not be overlooked.

Proposals to enable simpler inspections in AVS 3+

To ensure the affordability and availability of building glass products, while maintaining the confidence that DoPC data provide to consumers, it is urgent to ensure that the initial inspections of AVS 3+ can take place as efficiently as possible. To this end, Glass for Europe calls on policymakers to:

- **Make remote inspections of company-specific data a default procedure.** The elements mentioned by the CPR for AVS 3+ inspections^{vi}, and the data used to validate the declaration of environmental characteristics of products, can be inspected without on-site audits.
- **Allow the use of results of past inspections for data which are not product type-dependent.** If a new product type is manufactured in a factory that has already been inspected for another product type, re-inspection of elements that are not product type-dependent is unnecessary.
- **Allow the use of inspection results from one plant for another if the processes and data type to be inspected for both plants are the same.** For example, float glass plants with an air-fuel furnace generally operate in the same way. For those, multisite sampling should be allowed, as nothing will be gained from repeating the inspections. In contrast, when the furnace technology differs, a separate inspection could make sense, as it operates differently.
- **Allow results of previous verifications to be used as inspection results when the inspected data are similar.** For instance, when products with a voluntary EPD become regulated under the CPR 2024, the repetition of inspections should not be mandatory for data that has been verified and remains unchanged.
- **Allow inspections to be performed when the product type is not in production,** if this does not affect the data that must be inspected.
- **Allow multiple product types to be verified during a single inspection.**

These elements could enable inspection procedures that still “cover all locations at which significant manufacturing processes take place”^{vii}, as mandated by the CPR, while imposing limited burdens on the building glass market and benefiting EU housing and construction in general.

As many of the elements mentioned above are likely to apply differently across product types, Glass for Europe also recommends including explanations and practical rules for AVS 3+ in product standards, e.g., to enable well-adjusted initial inspections.

Glass for Europe considers that those proposals would contribute to EU objectives of regulatory simplification, increased sustainability of construction products, and housing affordability. We therefore remain at the disposal of policymakers to discuss the matter.

ⁱ Regulation (EU) No 2024/3110 of the European Parliament and of the Council of 27 November 2024 laying down harmonised rules for the marketing of construction products and repealing Regulation (EU) No 305/2011. <http://data.europa.eu/eli/reg/2024/3110/oj>

ⁱⁱ Regulation 2024/3110, Annexe IX (4).

ⁱⁱⁱ GNB-CPR GNB-AG. (25 June 2025). *Guidance to notified bodies on the Assessment and Verification of Constancy of Performance under the Construction Products Regulation (EU) No. 305/2011. NB-CPR/17/722r11*. <https://www.itb.pl/wp-content/uploads/2025/06/NB-CPR-17-722r11-Revised-guidance-on-the-systems-of-AVCP.pdf>

^{iv} GNB-CPR SH03. (11 September 2025). *Position Paper: Validation Methodology related to environmental sustainability (AVCP System 3+)*. NB-CPR/SH03/24/031r4.

^v Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 laying down harmonised conditions for the marketing of construction products and repealing Council Directive 89/106/EEC. <https://eur-lex.europa.eu/eli/reg/2011/305/oj/eng>

^{vi} Regulation 2024/3110, Annexe IX (7)(a): “When a system includes an inspection of the manufacturing plant by a notified body, those inspections shall cover all locations at which significant manufacturing processes take place and shall at least include verification of the following elements:

(i) the factory production control specifying the measures and frequencies foreseen to ensure constancy of performance, including the critical to performance parameters;

(ii) an outline of the intended factory production control.”

^{vii} Ibid.