

## Feedback on "Public Consultation on the RoHS Evaluation"

EuroWindoor appreciates the opportunity to give feedback during the Public Consultation supporting the evaluation of Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)<sup>1</sup>. Unfortunately a vast majority of the questions are not suitable for construction products like windows, doors and facades with electrical devices falling under category 11 ("Other EEE not covered by any of the categories"). We therefore chose to reply by this document clarifying EuroWindoor's request:

**Electrical devices attached to windows, doors and facades shall be regulated by RoHS, but not the construction product itself which is covered sufficiently by CPR (2011/305/EU) and REACH (2006/1907/EC).**

EuroWindoor represent the interest of the European window, door and façade sector and has in this role previously provided input for studies and consultations related to RoHS (2011/65/EU). These products which are normally installed permanently in buildings by professionals have a long life time (40+ years) whereas the electrical device that might be fitted to it will have a much shorter life time (10-15 years). The electrical devices will therefore always be easily replaceable and by that possible to both buy and dispose separately. At the same time the innovation rate within appliances for smart homes are high which means that when an electrical device is replaced, it will most likely be replaced by another type than originally provided with the product. Due to these facts EuroWindoor supports that these electrical devices are regulated through RoHS, whereas EuroWindoor believes RoHS only bring administrative burdens and no real added protection of humans and the environment beyond what is already achieved through the Construction Product Regulation (2011/305/EU) and REACH for the window, door or façade as such.

### History of input given by EuroWindoor on ROHS implementation and review

2019-01: EuroWindoor position on RoHS II for windows and doors with electrical equipment depending from route of distribution ([link](#))

2018-10: EuroWindoor Feedback on Evaluation Roadmap on RoHS review ([link](#))

2015-07: EuroWindoor position on RoHS II Directive for windows and doors ([link](#))

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**About EuroWindoor AISBL** – EuroWindoor 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 18 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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<sup>1</sup> [Public Consultation on the Hazardous substances in electrical/electronic equipment – evaluation of restrictions](#)