

## Inception Impact Assessment on the revision of REACH

EuroWindowor appreciates the opportunity to provide feedback to the inception impact assessment on the revision of REACH Regulation. The small and medium sized companies of the European window, door and façade sector are downstream users at the end of a long supply chain and far away from the chemical industry. So, we would like to give some thoughts about the difficult situation of our sector which should be additionally considered for the revision of the REACH regulation.

EuroWindowor believes REACH generally works well within the areas of substances and mixtures, but improvements could be needed, when it comes to communication in the supply chain on articles. The regulation is within our sector including entire supply chain perceived as technical difficult and complex, especially among the many SMEs within this sector.

The following figure 1 from the [EuroWindowor Information REACH: 2016-08 "REACH - Fast Facts"](#) illustrates the communication of information according to REACH for complex objects like windows and doors. Windows and doors are articles (complex objects) which are mainly assembled from articles of different suppliers, which are often also articles made of articles (complex objects) from other suppliers. The producer of windows and doors does inform the consumer according to Art. 33 REACH and needs therefore to receive all the information from the suppliers.

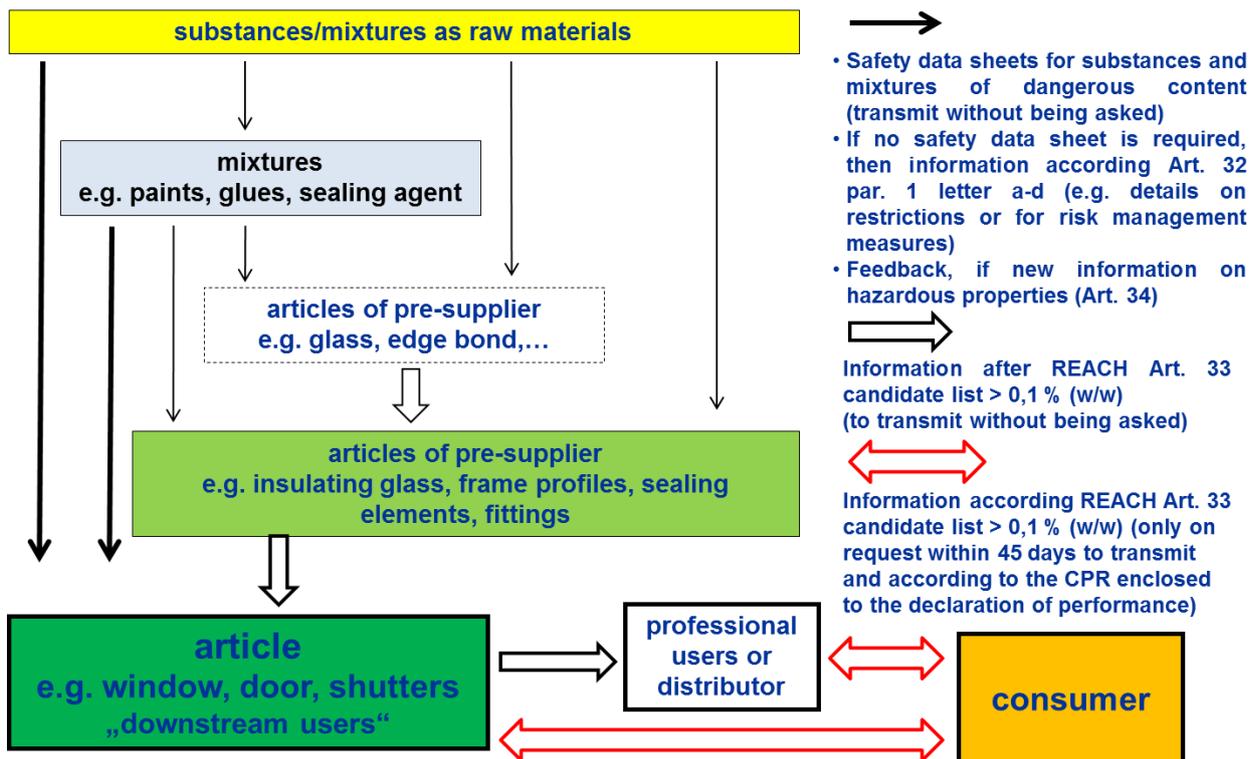


Figure 1: Communication of information for articles of articles according to REACH

The SMEs at the end of a long supply chain have a high responsibility in the line of communication, but typically the lowest chemical knowledge, while they are completely dependent on their suppliers to comply with the regulation. There is no chance for the SMEs to have any control of the suppliers and to check, if a piece of information of a prefabricated article is lost in the supply chain. If a new substance on the candidate list appears, the SME is not able to determine, if it might be relevant to him or not.

Therefore, additional information to the SVHC of the candidate list, e.g. on the intended use and which groups of articles might be affected, would be of a great support.

Please find some EuroWindoor comments to the policy options below.

### **Revision of the registration requirements**

Registration requirements should be based on scientific evidence and applied consistently.

### **Introduction of a Mixtures Assessment Factor (MAF)**

Scientific and socioeconomic evidence on the impact of MAFs on the European market are still insufficient. More research and modelling are required before an assessment of the pros and cons of this approach can be completed. EuroWindoor invites the Commission to initiate further evidence gathering and to present it to stakeholders.

### **Simplifying communication in the supply chains**

It is the experience of our members that communication via Safety Data Sheet is not causing severe communication gaps in the supply chain. The problems with poor or no communication primarily occur when using articles (e.g. insulating glass, gaskets, building hardware etc.) to create complex articles, like windows and doors. These problems are often linked with the fact that the producers of these articles are SME's with no resources available with the needed chemical skills. Therefore creation of electronic communication templates are not solving the real problem. What is needed is more guidance in layman terms and not least tools for these companies to be able to evaluate and communicate further in the supply chain, if their articles are containing any candidate list substances.

### **Revision of the provisions for dossier and substance evaluation**

EuroWindoor welcomes the initiative to streamline procedures and to accelerate decision-making.

### **Reforming the authorisation process**

EuroWindoor welcomes initiatives making the authorisation process faster and simpler, but would warn against pursuing initiatives that would place responsibility at national authorities for handling even smaller provisions as that would inevitably cause barriers of trade and market distortion.

### **Reforming the restriction process**

EuroWindoor would welcome changes to the restriction process in terms of improving the consultation of stakeholders. Today the process is purely written procedure and often found as difficult assessable. Making the process more dialogue based could improve the adoption of relevant and workable restrictions benefitting both the health and environment as well as the industry needing to work with the restrictions and develop alternative solutions in due time.

EuroWindoor members are deeply concerned that the current REACH framework does not consider recycling and the use of recycle. In the context of the circular economy recycling should be the rule and not the exception which is only assessed on a case-by-case basis.

Interfaces with RoHS and waste must be clarified. Today a window with a motor has to comply with different legislative requirements than one without.

### **Revision of provisions for control and enforcement**

EuroWindoor welcomes initiatives to improve enforcement in Member States and thereby ensuring a level playing field across Europe.

We look forward to supporting the European Commission throughout the revision process.

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**About EuroWindoor AISBL** – EuroWindoor AISBL was founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 19 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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