

## RoHS requirements for windows and doors with electrical equipment depending from route of distribution

RoHS Directive 2011/65/EU will come into force for construction products with electrical devices in July 2019. It is not written in the directive that the complete window or door with electrical device will become an electrical equipment, but the EU Commission states in the FAQ that construction products shall belong to category 11 (“Other EEE not covered by any of the categories”).

EuroWindow sees problems by implementing the RoHS requirements because of different procedures and responsibilities of installing electrical devices to windows and doors resulting in different requirements for the products. **Only if** the electrical devices are included before the complete product is placed on the market, the RoHS requirements do apply to the complete construction product. More often the electrical devices are installed after the construction product is placed on the market. Then the window or door complies with CPR / REACH and the electrical devices with RoHS.

The following practical example of a door with a motor lock illustrates different procedures and responsibilities resulting in different requirements for the products.

























Case 1: Motor lock in the factory by the manufacturer installed and delivered

Case 2: Motor lock installed at the building site by the manufacturer after the door installation

Case 3: Motor lock installed by distributor at building site before the door installation

Case 4: Motor lock installed by installer or lock manufacturer in a door at building site

Case 5: Motor lock installed by building owner in a door in the building


Cases	 Factory / Manufacturer door set	 Distributor / DIY Shop	 Installer / Construction site	 Building owner / Building
Door set with motor lock put on the market				
Motor lock installed on site by door manufacturer				
Motor lock installed by distributor				
Motor lock installed on site by installer / lock manufacturer				
Motor lock installed by owner				

Key:

Door set 

Motor lock 

Installation 

Passing on documents 

EuroWindoor supports the approach of RoHS for electrical devices, but does not see a need to extend the scope to the complete construction product. Windows and doors are sometimes placed on the market including an electrical device, but more often the electrical device is amended later to the construction product, probably by a different company. Different requirements for the product depending from the distribution route may cause more costs due to administrative burdens for those manufacturers installing the electrical device in the factory and thus lead to market distortion.

EuroWindoor still believes that it would be both proportionate and appropriate to limit the scope to the electrical device of the window/door, something that could be done by clarifying the definition of large scale fixed installations. Windows and doors are normally assembled and installed by professionals and will stay in the building for 40+ years whereas an electrical device itself typically will be replaced 2 to 3 times during this period. This is partly due to shorter expected life time for these components but maybe more importantly due to high innovation rate in development of new and smarter solutions that can be an integrated part of smart buildings.

Construction products have to comply with both CPR and REACH. Regarding REACH it is important to remember that it regulates on article level which not necessarily is the same as homogeneous material level as regulated by RoHS. Besides of this there are other fundamental differences between the two pieces of legislation which by the end of the day makes it difficult for a manufacturer to draw the conclusion: *“as I know my window or door fulfil the requirements of REACH then I can also be sure it fulfil RoHS and I can therefore CE mark my product accordingly.”* This is not necessarily true!

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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 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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