



Feedback on "Hazardous substances in electrical/electronic equipment – evaluation of restrictions"

EuroWindowor appreciates the opportunity to give feedback to the evaluation of restrictions included in the RoHS Directive 2011/65/EU.

EuroWindowor represent the interest of the European window, door and façade sector and has in this role previously provided input for a study initiated by the European Commission to analyse the impact on the industry when windows and doors with electrical function becomes part of the scope of RoHS legislation from July 2019. In the study it is assumed that windows or doors become an electrical/electronic equipment, if an electrical device is included when placed on the marked. This point of view is based on the RoHS-FAQ from the European Commission only.

EuroWindowor 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 marked including an electrical device, but more often the electrical device is amended later to the construction product, probably by a different company. Therefore EuroWindowor can still not agree to the conclusion and recommendation of the report and our argumentation to support this is still the same (see EuroWindowor position paper "[RoHS II Directive - Study for impacts from RoHS2 on windows and doors with electric functions](#)" dated July 1st, 2015).

EuroWindowor 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.

About EuroWindowor AISBL – EuroWindowor 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 17 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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EU Transparency Register ID Number: 29749561729-18