

## **EuroWindowor feedback to public consultation on ECHA's restriction proposal of PFAS**

EuroWindowor welcomes the PFAS restriction proposal submitted by Denmark, Germany, the Netherlands, Norway and Sweden. It represents a major step for the Union's Chemical Strategy and initiates an unprecedented transformation of the European industry.

Our association started a dialogue with its members (national associations of window and door manufacturers) right after the publication of the restriction's proposal in 2023 and we are currently collecting feedbacks regarding challenges and future pathways for our industry.

This public consultation represents a great opportunity for EuroWindowor to provide specific feedbacks for our industry, specifically due to its downstream position and the complex nature of our products like windows, doors and curtain walling. While our direct knowledge of PFAS and their specific uses is undoubtedly lower than that of our indirect upstream suppliers, we will provide our best evaluation of the situation and expectable timelines for the window and door sector.

However, the identification process of PFAS in our supply chain causes serious challenges to our sector due to the very large number of different components/materials to check as well as the complete absence of information in the supply chain (no systematic registration in the REACH database).

While we are still in the process of evaluating and better understanding the existence of PFAS in the components used in our products, we would like to highlight 3 critical challenges to be addressed for a workable transition towards a PFAS restriction in our industry. Those challenges primarily concern the scope of the restriction, the timeline and the future of spare parts and existing stocks. Each of these challenges should be carefully considered (see proposals from our sector below) to avoid any unprecedented consequences for the production of windows and doors in the EU.

### **I. Challenge 1: Scope of the proposed restriction**

Since its introduction in 2007, the REACH regulation has become one of the key sources of information of our industry. It requires our suppliers to provide information for registered substances at an early stage, and helps us anticipate future restrictions (e.g. when listed as Substance of Very High Concern).

The restriction proposal of PFAS faces us with a new challenge since the scope addresses all substances in the PFAS family at the same time. Several commonly used substances are currently not listed as substances of concern and our industry had not been able to identify the full risk prior to the restriction proposal.

This means that – in the absence of clearly identified EC/CAS numbers for the restriction – our industry is currently unaware of the presence of PFAS in our supply chain.

**We therefore recommend that the proposal introduces an identification period where information on PFAS content is streamlined through the value chain and reaches our downstream industry. Even in the absence of clearly identified EC/CAS numbers, our suppliers must be mandated to inform their customers that they provide materials/component containing PFAS. This is currently not the case.**

## II. Challenge 2: Timeline of implementation

The window and door sector is a complex industry (mostly SMEs) manufacturing products through the assembly of multiple components and materials (typically 150-250 components per product). The due diligence needed to identify the presence of PFAS in such a large number of parts (each of them potentially coming from different suppliers) requires several months and a transition towards PFAS-free solutions cannot be implemented within the suggested timeframe.

We especially consider that the restriction proposal R01 is incompatible with the task to be carried out by our downstream industry.

In addition, the construction sector requires several years of development, testing and certifications/authorizations before placing a new or modified product on the market. Eliminating PFAS from our supply chain will necessarily trigger such processes and re-evaluation of our products conformity.

**In light of the complexity of windows, doors and curtain walling, as well as the limited resources of our industry (mostly SMEs), we recommend that a derogation under restriction option R02 is granted for the window and door sector. This will secure a smooth transition towards a complete phaseout of PFAS and prevent any disruption of the production capacity of our industry, which place a critical role in the decarbonisation of the building sector.**

## III. Challenge 3: spare part and existing stocks

Our industry is required to deliver durable products to match the expected long lifespan of buildings and ensure an optimal use of resources. This commitment is met by placing high-quality products on the market but also by securing the availability of spare parts for all windows, doors and curtain walling.

Some of those spare parts might be kept in stock for many years for several reasons (low-demand, high manufacturing volumes).

The restriction proposal does not account for the availability of spare parts which might remain in stock for several years and still contain PFAS, despite their critical importance to ensure the durability of window and door products. The reparability of existing products should be maintained now more than ever with the introduction of "right to repair" policies in several EU countries.

**We recommend to exclude stocks and spare parts from the scope of the restriction and include them in a special derogation approach to ensure the lifespan of installed windows, doors and curtain walling.**

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**About EuroWindowor AISBL** – EuroWindowor 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 20 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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