Contribution ID: 7273378b-4950-44c6-a15b-05ee761598a3

Date: 22/05/2026 14:29:10

13. Construction products

Fields marked with * are mandatory.

1 Respondent background information

Before responding to the survey, please read the following documents (see links in the sidebar):

1. **Guidance Document**
2. **Use Mapping**
3. **Privacy Statement**

☑

- I have read and understood the information in the **Guidance Document** and **Use Mapping**.
- I agree to the privacy policy as set out in the **Privacy Statement**.

---

* 1.1 **[Q1.0]** Select the EU language in which you will respond to the questions (the questions themselves will be in English only).

English

* 1.2 **[Q1.1]** Which of the following best describes you or your affiliation?

Select Citizen/individual if you are responding in a personal capacity.

Select Organisation if you represent an organisation (e.g. company) or other official role.

- ○ Citizen/Individual
- ◉ Organisation

* 1.3 **[Q1.2]** What type of organisation are you responding for?

- ○ Government organisation
- ○ Non-governmental organisation
- ○ Academic institution
- ◉ Industry association
- ○ Company

* 1.4 **[Q1.3]** What is the name of the organisation you are reporting for?

Text of 1 to 300 characters will be accepted

EuroWindoor AISBL

* 1.5 **[Q1.4]** Please name a point of contact ECHA can contact if needed.

Text of 1 to 100 characters will be accepted

A point of contact is needed for seeking clarification or justification for the consultation responses if considered necessary by SEAC.

For individual respondents, the contact's name is always kept confidential.

.

General Secretariat

* 1.6 **[Q1.5]** What is the email address for that contact point?

GS@eurowindoor.eu

1.7 **[Q1.6]** If you submitted comments in the previous consultation on the Annex XV restriction proposal (Mar-Sep 2023), please list the comment numbers (e.g. #1234, #5678).

300 character(s) maximum

* 1.8 **[Q1.7]** Is your organisation national or international?

Organisations having activities in several countries (in EEA or globally) should choose "international".

- ○ National
- ◉ International

* 1.9 **[Q1.8]** What country are you (or your organisation) based in?

Individuals should choose the country where they permanently reside.

Respondents representing organisations, such as companies, should select the country where the largest share of their PFAS related activities occur.

Respondents representing other organisations may choose the country where the organisation is based in.

Belgium (BE)

1.10 **[Q1.9]** How many members does your association have?

Provide the number of member organisations (e.g. for industry associations), or individuals (e.g. for trade unions).

20

* 1.18 **[Q1.17]** Are you providing information from the perspective of a **single organisation**, or **more broadly** (e.g. on behalf of multiple organisations or other broader perspective, such as, sector-wide view)?

The survey allows to provide information from a single organisation or multiple organisation perspective.

Select the single organisation perspective if your responses reflect the impact on the entity you are reporting for, where applicable.

Select the multiple organisation perspective, if you are submitting information that represents several companies (e.g. separate subsidiaries under one parent company or separate companies within the same sector or industry – such as in the case of industry associations).

- ○ I am reporting information for a **single organisation** – the responses provided reflect the impacts (e.g. losses) on the entity, which I am reporting for.
- ◉ I am reporting information **more broadly** e.g. for multiple organisations or a whole sector.

2 Information on use, sub-use, and application

Instructions

In the question below, select each SEAC evaluation level that you want to provide information on. For each selected evaluation level, specific questions open up.

When sharing information that is applicable to multiple evaluation levels assessed in the SEAC draft opinion, please consider each evaluation level individually and report the specific impacts and circumstances for that evaluation level.

If you have information on a use in this sector that is not considered under any of the SEAC evaluation levels, you can submit that information under 'other use'.

Please do only submit information under 'other use' if you are **certain** that your use does **not fall** under any of the SEAC evaluation levels listed below. Consult the use mapping document for a definition of each SEAC evaluation level.

If you are reporting as a parent company, please make sure that your responses are **not overlapping** with information submitted by a subsidiary of your company. If subsidiaries report separately, the information they provide should only reflect the impacts on that entity.

---

* 2.1 **[Q1.18]** Which specific use or application do you want to comment on?

Select all specific uses or applications (i.e. SEAC evaluation level) that you wish to comment on.

If your use or application is not explicitly mentioned under an SEAC evaluation level described in the use mapping, but it would reasonably be included in that category based on the definition, you may submit information for that SEAC evaluation level.

If your use is not covered by any SEAC evaluation level in the sector but you still consider it is covered within that specific sector evaluation, select 'other use'. If you want to provide information on multiple 'other uses' that are not covered by any SEAC evaluation level, you will have to submit a new survey form.

For certain evaluations, SEAC has considered an additional restriction option (RO3), for which there is a question.

- [ ] **[13.01] Architectural coatings and paints**
- [ ] **[13.02] Coil coating**
- [ ] **[13.03] Polymer additives used for fire safety purposes**
- [ ] **[13.04] Film/foil for greenhouses**
- [ ] **[13.05] Polymeric PFAS – processing aids for the production of non-PFAS polymers/plastics**
- [ ] **[13.06] Bridge and building bearings**
- [x] **[13.07] Window frames**
- [ ] **[13.08] Plumbing applications (wetted pipes and fittings)**
- [ ] **[13.09] Polymeric PFAS – surface protection**
- [ ] **[13.10] Side-chain fluorinated polymers – surface protection**
- [ ] **[13.11] Wetting/levelling agents in e.g. coatings, paints and adhesives**
- [ ] **[13.12] Non-polymeric PFAS used as processing aids to produce construction articles**
- [ ] **[13.13] Window film manufacturing**
- [ ] **[13.14] Other use as part of this sector (use not considered under the SEAC evaluations listed above)**

[13.07] Window frames

* 2.74 **[Q1.19]** What is or are the process(es) or product(s) PFAS (or an alternative to PFAS) are used in? How and why are they used?

Text of 1 to 2000 characters will be accepted

Briefly describe how PFAS (or alternatives) are used in your uses or applications. This should include e.g. the function provided by PFAS and the type of part/article/product they are used in.

If your use is covered by the scientific research and development exemption from the restriction (Article 67(1) of REACH) please indicate so.

In the window, door and façade industry, PFAS are mainly used in fluoropolymer-based surface coatings and certain low-friction or high-performance components.

The most relevant application is PVDF (polyvinylidene fluoride) coating systems for aluminum profiles, façade panels, curtain walls and architectural doors. PVDF belongs to the fluoropolymer group and is therefore considered part of the broader PFAS family. These coatings are typically applied as liquid or coil coatings for high-performance architectural applications.

PVDF is used because it provides:
- excellent UV and weather resistance,
- outstanding color retention and gloss stability,
- high chemical and corrosion resistance,
- low chalking and dirt pickup,
- long service life, especially in harsh climates and highly exposed façades.

PFAS-related materials may also be present in:
- PTFE-based sliding or friction-reducing elements in hardware systems, specialty gaskets using fluorinated elastomers,
- ETFE films used in selected façade applications.
- Fire resistant coatings

The main alternatives to fluoropolymer-based coatings are:
- super durable polyester (SDP) powder coatings,
- hyper-durable polyester systems,
- fluorine-free architectural coating technologies,
- anodizing in selected applications.

These alternatives are used to reduce or eliminate PFAS content while still providing high durability and weather resistance. Polyester-based systems are currently the most common alternative for architectural aluminum because they offer good outdoor performance, are widely available and support easier recycling and regulatory compliance

* 2.75 **[Q1.20]** Do suitable alternatives exist for this use/application?

Suitable alternatives are those that are technically and economically feasible, safer for human health and the environment, and available in sufficient quantities.

- ○ Yes
- ○ No
- ◉ I do not know

2.76 **[Q1.21]** What is the availability of alternatives for this use/application?

Select all options that apply in general for this use/application and provide an explanation of each point in the next question.

between 1 and 4 choices

Select the option that best describes the overall situation for application(s) you described above.

If your response concerns multiple applications, you can provide more detailed information for each application and its alternatives in the question below.

Option 6 is available for stakeholders who do not have information on the availability of alternatives.

- ☐ **1. Alternatives are not available due to insufficient quantities**: PFAS-free alternatives are not available in sufficient quantities for this use/application.
- ☐ **2. Alternatives are not available because of safety concerns**: PFAS-free alternatives are not safer for human health or the environment.
- ☐ **3. Alternatives are not available because of technical feasibility**: PFAS-free alternatives do not meet the functional requirements for this use/application.
- ☐ **4. Alternatives are not available because of economic feasibility**: It is not possible to operate profitably using the alternatives.
- ☐ **5. None of the above - Alternatives are available**: There are suitable alternatives for this use/application. They exist in sufficient quantities, they are safer than PFAS, and they are technically and economically feasible.
- ☐ **6. No information on alternatives**

2.77 **[Q1.22]** Please give a justification for your responses above by providing an explanation for each of the four points. Make sure to name which specific application and alternative you are referring to:

1. **Sufficiency**: Are the alternatives available in a sufficient quantity for this use/application?

2. **Safety**: Are there concerns for risks on human health or the environment that could limit the substitution potential of alternatives?

3. **Technical feasibility**: Are there technical requirements for this use/application? How do potential alternatives perform against the requirements?

4. **Economic feasibility**: What is the impact of using the alternative on profitability? How much would switching to the alternative cost?

Text of 1 to 3000 characters will be accepted

1. Sufficiency
For PVDF architectural coatings, fluorine-free alternatives such as super durable polyester (SDP) and hyper-durable polyester systems are generally available in sufficient quantities for most standard window, door and façade applications. The coating industry already has large-scale production capacity for these systems.
However, for highly demanding environments — such as coastal areas, tropical climates or landmark buildings requiring very long warranty periods — some stakeholders consider current alternatives not yet fully equivalent to PVDF in long-term field performance.
For PTFE-based sliding components and fluorinated elastomers, alternatives exist but may be more application-specific and less standardized.

2. Safety
Alternatives such as polyester powder coatings generally present fewer concerns related to PFAS persistence and environmental accumulation. They are typically considered easier to manage from a regulatory and recycling perspective.
However, substitute materials must still meet general chemical safety requirements regarding VOCs, additives, durability and fire performance. Some alternative coating technologies may require different curing agents or additives that also need environmental and occupational assessment.
Overall, non-fluorinated alternatives are widely viewed as having lower long-term environmental concern compared with fluoropolymers.

3. Technical feasibility
PVDF coatings are widely recognized for exceptional UV resistance, color retention, chemical resistance, and durability over decades of outdoor exposure. This remains the benchmark for highly exposed façades.
Modern SDP and hyper-durable polyester coatings can achieve very good performance and already meet the technical requirements of many commercial and residential projects. However, they may show lower long-term gloss retention and weathering resistance under extreme exposure conditions compared with PVDF.
For most standard European window and façade applications, polyester-based systems are technically feasible. In highly aggressive environments, project specifications may still favor fluoropolymer technologies.

4. Economic feasibility
Switching from PVDF to polyester-based alternatives is generally economically feasible and may even reduce direct coating costs. Polyester powder coatings are often less expensive and can simplify recycling and compliance processes. However, switching may create indirect costs related to:
- requalification of systems,
- testing and certification,
- revised warranty structures,
- customer approval processes,
- potential reduction in expected coating lifetime in extreme environments.
For manufacturers already using powder coating infrastructure, transition costs are usually manageable. The economic impact is therefore considered moderate for most mainstream applications, but potentially more significant for premium architectural façade projects with very high durability requirements.

2.78 **[Q1.23]** How many years would it take to develop alternatives to a stage where they can be implemented for the use/application?

Only values of at most 20 are allowed

If you cover several applications in your response, provide an estimate that allows PFAS to be substituted in all of them.

If you cannot provide an estimate, do respond to the question.

years

2.79 **[Q1.24]** What is the total annual volume (tonnes) of PFAS used (or imported) for this specific use /application in the EEA?

Provide the annual volume (tonnes) for each type of PFAS used (or imported) in the EEA by your organisation, or by the organisations included in your response if reporting for a group. Do not include tonnages used outside the EEA.

	Annual volume of PFAS used
Non-polymeric PFAS	tonnes/year
Polymeric PFAS	tonnes/year
Fluorinated gases	tonnes/year

2.80 **[Q1.25]** If PFAS could not be used in this use/application, what would be the most likely impact on organisation(s) covered by your response?

Maximum 1 selection(s)

Consider a situation where PFAS could not be used in this use/application by you or your competitors (including articles imported from outside the EEA).

Select the option that best describes the situation for applications you described above. When responding on behalf of a group of organisations, choose the option that is most representative of the covered companies.

- ☐ Permanent closure of business or parts of it (including relocation outside EU)
- ☐ Temporary closure of business or parts of it (including relocation outside EU)
- ☑ Continued operations with increased costs or lower quality
- ☐ Positive impact (e.g. business opportunity)
- ☐ No impact or minor impact

2.81 **[Q1.26]** What is the average annual gross profit in euros, based on the past three years, from business operations that depend on this PFAS use/application in the EEA?

The figure should include only profits for the organisation you are reporting for i.e. the reported profits should not include profits of any clients or other parties in the supply chain, as those are considered separately.

Report a value covering all applications you described in the response above. When responding on behalf of multiple companies, report a total value for all concerned companies.

Profits generated by companies outside the EEA should not be included.

€ / year

2.82 **[Q1.27]** If PFAS could not be used in this use/application, how many full-time equivalent (FTE) jobs would be lost in your organisation or the companies covered by your response within the EEA?

Consider a situation where PFAS could not be used in this use/application by you or your competitors (including articles imported from outside the EEA).

Report a value covering all applications you described in the response above. When responding on behalf of a group of companies, report a total value for all covered companies.

FTEs

2.83 **[Q1.28]** Please clarify how you have calculated your responses in the two previous questions above on profits and employment losses.

Text of 1 to 2000 characters will be accepted

Clarify your calculations and name any sources you may have used.

We have no exact data to calculate.

2.84 **[Q1.29]** If PFAS could not be used in this use/application, what is the magnitude of potential negative impacts on society, e.g. from lack of access or worse quality of products (in addition to impacts on employment and profit losses)?

Consider other societal impacts than profits or employment and indicate their expected magnitude.

Impacts are considered greater, for example, when they affect large populations or significantly reduce quality of life. There is no exact and objective definition of what constitutes each category -please provide your best estimate. This question is used to gauge the responses and SEAC will assess the impacts based on the information in the following question.

Do not include information on health and environmental impacts of PFAS itself.

- ○ Very low or none
- ◉ Low
- ○ Moderate
- ○ High
- ○ Very high
- ○ I do not know

2.85 **[Q1.30]** Please explain your response to question above, e.g. by describing the elements leading to your judgement on the magnitude of additional impacts. If possible, provide quantified or monetised estimates of the impacts.

2000 character(s) maximum

Describe additional negative impacts, such as changes in quality of life resulting from reduced availability or lower quality of products. It is sufficient to describe the impacts, but quantified or monetised estimated can also be provided.

Do not include information on health and environmental impacts of PFAS itself here, but in the general survey.

The number of premium architectural façade projects with very high durability requirements is considered to be small.

3 Confidentiality and submission

3.1 **[Q1.32]** Indicate each section for which your response contains confidential information.

Select all the questions for which you consider your responses confidential.

The options below include all questions in the survey. Please note that some questions may be only visible depending on the response to another question.

- ☐ Respondent background information
- ☐ Information on use, sub-use, and application

Useful links

Guidance Document (https://echa.europa.eu/documents/10162/17091/upfas-seac-do_consultation_guidance-for-respondents_en.pdf/68d5b13b-d7d6-f14b-2c3e-9b3c07c98113?t=1765956675386)

Use Mapping (https://echa.europa.eu/documents/10162/17091/pfas_use-mapping_annex_to_guidance_for_respondents_en.pdf/e242dcf0-0aab-2619-234e-09445bb181c5?t=1765893415372)

Background Documents

Privacy Statement

Contact

https://comments.echa.europa.eu/comments_cms/Contact_REACH.aspx