

Exemption Request Form

Date of submission: 14 December 2015

1. Name and contact details

1) Name and contact details of applicant:

Company: EuroWindowdoor AISBL Tel.: _____
Name: Joachim Oberrauch E-Mail: GS@eurowindowdoor.eu
Function: President Address: _____

In cooperation with

Company: EPPA ivzw Tel.: _____
(European PVC Window Profile and Related Building
Products Association)
Name: Tom Debusschere E-Mail: info@eppa-profiles.eu
Function: President Address: _____

2) Name and contact details of responsible person for this application (if different from above):

Company: EuroWindowdoor AISBL Tel.: [+49 \(69\) 955054 - 17](tel:+49(69)955054-17)
Name: Frank Koos E-Mail: koos@eurowindowdoor.eu
Function: Secretary General Address: General Secretariat:
Walter-Kolb-Str. 1-7
60594 Frankfurt (M) / Germany

Company: EPPA Tel.: [+32 \(2\) 7 39 63 81](tel:+32(2)7396381)
Name: Gerald Feigenbutz E-Mail: gerald.feigenbutz@eppa-profiles.eu
Function: Managing Director Address: Avenue de Cortenbergh 71
1000 Brussels – Belgium

2. Reason for application:

Please indicate where relevant:

Request for new exemption in: **use of recycled PVC for profiles (windows and doors)**

Request for amendment of existing exemption in

Request for extension of existing exemption in

Request for deletion of existing exemption in:

Provision of information referring to an existing specific exemption in:

Annex III

Annex IV

No. of exemption in Annex III or IV where applicable: _____

Proposed or existing wording: _____

Duration where applicable: _____

Other: _____

3. Summary of the exemption request / revocation request

Lead and Cadmium in post-consumer PVC-U profiles of windows and doors cannot be mechanically disjointed, therefore the exemption will not weaken environment and health protection afforded by REACH. The exemption can be justified by the fact, that PVC is a material well-suited to recycling. It has the longest history of recycling among plastics, and it is most advanced in mechanical recycling.

Benefits: Recycling PVC-U reduces the amount of energy and natural resources (such as water, petroleum and natural salt) needed to create virgin PVC. Recycling PVC-U-profiles of windows and doors also keeps them out of landfills and allows the PVC to be reused in manufacturing new profiles for new windows and doors (Life Cycle and socio-economic advantages), as intended by the communication COM(2014) 398 "Towards a circular economy: A zero waste programme for Europe" and the communication COM(2014) 445final on resource efficiency opportunities in the building sector.

The new commitment of the European PVC industry, VinylPlus, addresses emissions during production, recycling and sustainable use of additives, as well as energy consumption, potential use of renewable raw materials and sustainability awareness across the value chain.

4. Technical description of the exemption request / revocation request

(A) Description of the concerned application:

1. To which EEE is the exemption request/information relevant?

Name of applications or products: **Windows and doorsets**

a. List of relevant categories: (mark more than one where applicable)

- | | |
|----------------------------|--|
| <input type="checkbox"/> 1 | <input type="checkbox"/> 7 |
| <input type="checkbox"/> 2 | <input type="checkbox"/> 8 |
| <input type="checkbox"/> 3 | <input type="checkbox"/> 9 |
| <input type="checkbox"/> 4 | <input type="checkbox"/> 10 |
| <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 11 |
| <input type="checkbox"/> 6 | |

b. Please specify if application is in use in other categories to which the exemption request does not refer: _____

c. Please specify for equipment of category 8 and 9:

The requested exemption will be applied in

- monitoring and control instruments in industry
 in-vitro diagnostics
 other medical devices or other monitoring and control instruments than those in industry

2. Which of the six substances is in use in the application/product?

(Indicate more than one where applicable)

Pb Cd Hg Cr-VI PBB PBDE

3. Function of the substance: **for profiles**

4. Content of substance in homogeneous material (%weight): **up to 2% Pb and up to 0,1% Cd**

5. Amount of substance entering the EU market annually through application for which the exemption is requested: **PVC windows contribute with 203,962 tons (42%) to the VinylPlus framework**

Please supply information and calculations to support stated figure.

See "Progress Report on Rigid PVC Window Recycling within the Voluntary Commitment of the PVC Industry, VinylPlus", EPPA, December 2015

6. Name of material/component:

7. Environmental Assessment: **Recycling has a positive environmental impact**
LCA: Yes (e.g. EPDs from [ift Rosenheim](#) and [EPPA](#))
 No

(B) In which material and/or component is the RoHS-regulated substance used, for which you request the exemption or its revocation? What is the function of this material or component?

Used in the PVC-U frame material for windows and doorsets.

Function: Stabilizer of PVC-U for profiles

(C) What are the particular characteristics and functions of the RoHS-regulated substance that require its use in this material or component?

The particular characteristic is to stabilize the polymer.

5. Information on Possible preparation for reuse or recycling of waste from EEE and on provisions for appropriate treatment of waste

1) Please indicate if a closed loop system exist for EEE waste of application exists and provide information of its characteristics (method of collection to ensure closed loop, method of treatment, etc.)

It exists a closed loop of PVC-U profiles for post-consumer windows and doorsets (e.g. Rewindo)

2) Please indicate where relevant:

- Article is collected and sent without dismantling for recycling
 Article is collected and completely refurbished for reuse
 Article is collected and dismantled:

The following parts are refurbished for use as spare parts: _____

The following parts are subsequently recycled: **PVC-U, glazing, metal**

Article cannot be recycled and is therefore:

Sent for energy return

Landfilled

3) Please provide information concerning the amount (weight) of RoHS substance present in EEE waste accumulates per annum:

In articles which are refurbished _____

In articles which are recycled In 2014 around 60,000 tonnes post-consumer PVC containing approx. 600 tonnes of post-consumer PVC in EEE waste with up to approx. 3 tonnes RoHS substances

In articles which are sent for energy return _____

In articles which are landfilled _____

6. Analysis of possible alternative substances

- (A) Please provide information if possible alternative applications or alternatives for use of RoHS substances in application exist. Please elaborate analysis on a life-cycle basis, including where available information about independent research, peer-review studies development activities undertaken

Possible alternative already applicated for virgin PVC-U: CaZn as stabilizer for PVC-U instead of Pb and/or Cd, but no alternative for the use of recycled PVC

- (B) Please provide information and data to establish reliability of possible substitutes of application and of RoHS materials in application
- _____
-

7. Proposed actions to develop possible substitutes

- (A) Please provide information if actions have been taken to develop further possible alternatives for the application or alternatives for RoHS substances in the application.

Application of CaZn for stabilization of PVC-U needs no further developing of alternatives, but no alternative for the use of recycled PVC

- (B) Please elaborate what stages are necessary for establishment of possible substitute and respective timeframe needed for completion of such stages.
- _____
-

8. Justification according to Article 5(1)(a):

(A) Links to REACH: (substance + substitute)

1) Do any of the following provisions apply to the application described under (A) and (C)?

- Authorisation
- SVHC
 - Candidate list
 - Proposal inclusion Annex XIV
 - Annex XIV

Restriction

- Annex XVII for Cd (EU/494/2011)
- Registry of intentions

Registration

2) Provide REACH-relevant information received through the supply chain.

Name of document: _____

(B) Elimination/substitution:

1. Can the substance named under 4.(A)1 be eliminated?

Yes. Consequences? **Pb and Cd already substituted with CaZn, but not in the recycling material**

No. Justification: _____

2. Can the substance named under 4.(A)1 be substituted?

Yes.

- Design changes:
- Other materials:

Other substance: **CaZn**

No.

Justification: _____

3. Give details on the reliability of substitutes (technical data + information):

CaZn as stabilizer for PVC-U profiles for windows and doorsets is state of the art and fulfils the requirements of the European standard EN 12608 "Unplasticized polyvinylchloride (PVC-U) profiles for the fabrication of windows and doors – Classification, requirements and test method" such as the quality standards RAL-GZ 716/1 and NF 126

4. Describe environmental assessment of substance from 4.(A)1 and possible substitutes with regard to

- 1) Environmental impacts: _____
- 2) Health impacts: _____
- 3) Consumer safety impacts: _____

⇒ Do impacts of substitution outweigh benefits thereof?

Please provide third-party verified assessment on this: _____

(C) Availability of substitutes:

- a) Describe supply sources for substitutes: _____
- b) Have you encountered problems with the availability? Describe: **No**
- c) Do you consider the price of the substitute to be a problem for the availability?
 Yes No
- d) What conditions need to be fulfilled to ensure the availability? _____

(D) Socio-economic impact of substitution:

⇒ What kind of economic effects do you consider related to substitution?

- Increase in direct production costs
- Increase in fixed costs
- Increase in overhead
- Possible social impacts within the EU
- Possible social impacts external to the EU
- Other: _____

⇒ Provide sufficient evidence (third-party verified) to support your statement: _____

9. Other relevant information

Please provide additional relevant information to further establish the necessity of your request:

Allowing the recycling of post-consumer PVC-U permits to close the Life Cycle of the PVC-profile for new windows and doors, as intended by the communication COM(2014) 398 "Towards a circular economy: A zero waste programme for Europe" and the communication COM(2014) 445final on resource efficiency opportunities in the building sector.

10. Information that should be regarded as proprietary

Please state clearly whether any of the above information should be regarded to as proprietary information. If so, please provide verifiable justification:

DRAFT