To

Ms Marie Dollhofer
BiPRO GmbH,
Grauertstr. 12,
81545 Munich, Germany

Stakeholder Consultation on Exemption Review under Directive 2011/65/EU, B-2016

Dear Mrs. Dollhofer,

The FCIO is the representative of the Austrian plastics windows producers. We would like to comment on the above mentioned stakeholder consultation.

1. Scope / wording and relevant category of the exemption request

The applicant has requested an exemption for "Cadmium and Lead used for windows and doors, being manufactured out of plastic window profiles containing recovered PVC, in case these windows and doors may be equipped or retrofitted with electric and/or electronic devices"

1.1. Do you agree with the scope of the exemption as proposed by the applicant?

Yes, we do.

1.2. Please suggest an alternative wording and explain your proposal, if you do not agree with the proposed exemption wording.

2. Environmental / health protection / consumer safety considerations

2.1. Do you have any comments with respect to the applicant's assessment of environmental, health and consumer safety issues?

No further comment.

2.2. Do you know about possible health effects of Cd/Pb contained in recycled PVC, which are no longer permitted in virgin PVC to protect the health of different actors?

We have no knowledge about negative health effects.

2.3. Do you have any comments regarding the environmental and health requirements as per the REACH Regulation?

We refer to the Cadmium derogation as a similar case.

2.4. Do you have any comments regarding the applicant's assessment of impacts and benefits?

We do agree with the applicant´s assessment.

2.5. Would you be able estimating the amount of Cd and Pb in recycled PVC-U profiles of electronic doors and windows which is placed on the market in the EU every year? Please indicate figures if yes.

The lead content in recyclates will be about 1% or less.

2.6. Do you support the applicant's conclusion that:

"The use of recycled PVC has a strong positive environmental impact by closing the loop towards a circular economy, by reducing the use of raw materials and by reducing the primary energy demand in the extrusion process and thus aims to achieve low carbon manufacturing".

Please argue why or why not.

We support the applicant's conclusion. Lead from stabilizers is embedded safely in the PVC-matrix. Recycling therefore is the most ecological solution for the treatment of PVC-waste. Incineration might cause other hazards.

2.7. Is it possible to quantify any environmental impact?

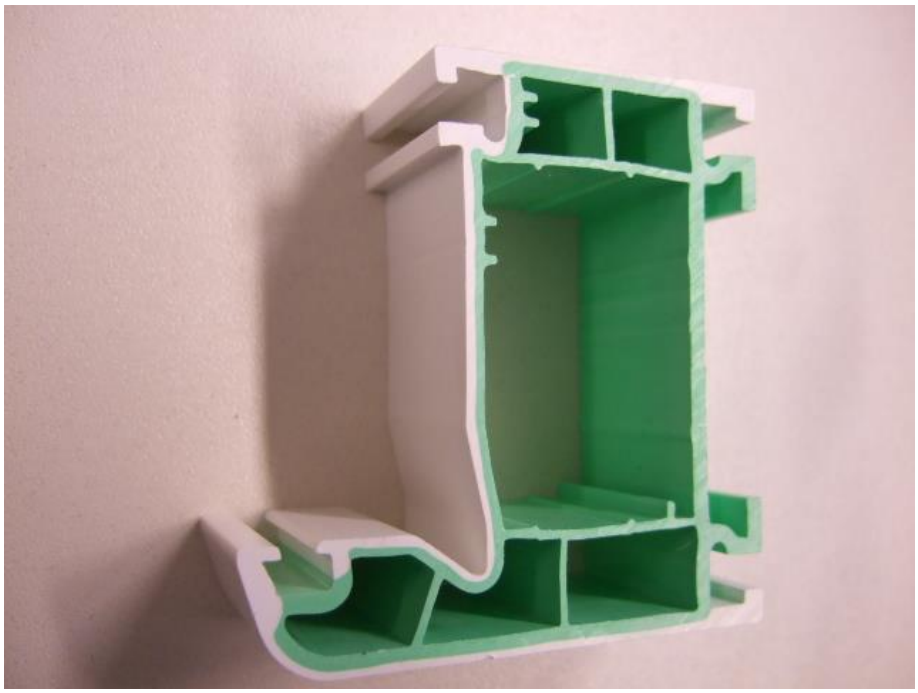
The use of recyclates in the production process saves emissions in comparison to the use of virgin material .

3. Socio - economic impacts of substitution

Please provide comments regarding the socio-economic impact of substitution as applicable.

Do you support the following statement of the applicant regarding socio-economic benefits of recycled PVC: *"The reuse of PVC waste, however, has a proven socio-economic benefit in particular with regard to decarbonisation, circular economy, competitiveness and raw material availability. For instance, the today´s ratio of around 16% recovered PVC used in PVC profiles reduce primary energy demand by approximately 8% (source: "Environmental Product Declaration for double - glazed PVC Windows, § 6.3 Sensivity concerning the use of recycled PVC (source: https://epd-online.com /PublishedEpd/Detail/9185)."*

3.1. Can you support this statement with further relevant data?



Please have a look at the photo (white is virgin material, green is recyclate): the recycling technology has the potential to create a nearly closed loop for the material.

If you don’t agree to this statement, could you provide relevant data?
Please feel invited to provide data regarding the total negative environmental, health and consumer safety impacts caused by substitution, as well as data regarding the total environmental, health and consumer safety benefits of exemption.

4. Any comments on potential adverse impacts on innovation in case of granting the exemption?

   No comments.