

## REACH restriction proposal on formaldehyde

EuroWindoor assessed the ECHA Annex XV Restriction Report and Proposal for a Restriction of Formaldehyde and Formaldehyde releasers, dated 7 March 2019. EuroWindoor has some concerns regarding the REACH restriction proposal on formaldehyde concerning windows, doors and facades (curtain walling) which we would like to express. The following suggestions shall give input to an approach with less effort but the same benefit.

### Test method of EN 16516 to measure formaldehyde from construction products

We overall agree that in the case of formaldehyde it makes sense to restrict the release and not content, as usually regulated by REACH. However, according to the REACH restriction proposal in clause 2.2.2 it has been suggested to use the test method EN 717-1<sup>1</sup> for all types of articles, despite the fact that this method is developed for wood-based panels only. We do not agree to the conclusion of the Dossier Submitter in Annex D.3. "Formaldehyde testing" giving preference to EN 717-1. This standard is not fit for purpose for other types of construction products or other type of articles in general. Most of the values for other types of articles than wood-based panels used in the dossier for the evaluation are measured according to EN 16516<sup>2</sup> with sufficient experience, like from the report by Fraunhofer WKI (Salthammer and Gunschera, 2017).

- The recommendation from EuroWindoor is therefore to use EN 16516 instead as test method for formaldehyde and other VOC emissions from construction products. EN 16516 is a horizontal test standard which defines material loads and test scenarios for all construction products and has been developed under mandate by European Commission.

### Restriction and testing is only useful for products with relevant formaldehyde indoor emissions

To EuroWindoor it is clear that wood-based panels are likely to be the type of construction products with the highest impact of formaldehyde release and it therefore makes sense to work towards some kind of restriction under REACH for this. We do believe that it will not gain any further safety by extending the restriction to cover also all other articles, especially like windows, doors and curtain walling. An exhaustive approach of testing would only add costs and administrative burdens for SME especially because windows, doors and curtain walling are very complex products build of many complex articles. This argument is backed by the results and conclusions contained in the Substance evaluation conclusion document on formaldehyde<sup>3</sup> clause 7.12.1 and Table 15.

At the same time windows, external doors and curtain walling mainly consist of glass with no emission at all and those products are placed in the building in a way that only half of the products is exposed to indoor air, which further adds to the argument that the formaldehyde release from these products as such has an insignificant influence. Studies like from Fraunhofer WKI did conclude a negligible amount of formaldehyde emission from windows, because usually not detectable. Thus the decision of the Dossier Submitter to fix a concentration for windows at 2 µg/m<sup>3</sup> in the report, because Salthammer and Gunschera (2017) reported formaldehyde concentrations below the detection limit < 2 µg/m<sup>2</sup> (footnote <sup>6</sup> in Annex B.4.5), is not acceptable!

- The recommendation from EuroWindoor is to exempt all articles without relevant formaldehyde indoor emissions like windows, doors and curtain walling and their parts.

<sup>1</sup> EN 717-1 - Wood-based panels – determination of formaldehyde release – part 1: formaldehyde emission by chamber method

<sup>2</sup> EN 16516 - Construction products – Assessment of release of dangerous substances – Determination of emissions into indoor air

<sup>3</sup> Substance Evaluation Conclusion as required by REACH Article 48 and Evaluation report for Formaldehyde EC No 200-001-8 CAS No 50-00-0 done by France in cooperation with the Netherlands, dated 7 June 2019

EuroWindoor is available for further discussions, clarification of the details in the proposal and related issues.

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**About EuroWindoor AISBL** – EuroWindoor 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 18 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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