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Communication to EPPA Company and National Association Members

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Lead Content of Products Manufactured Using Recycled Materials. Information to recipients.


In December 2012 lead has been added to the REACH Candidate List entailing companies producing products with lead stabilized content to advise their customers accordingly¹


This regulation applies if the lead content represents more than 0.1% of the material formulation. Clearly it will be impractical to test every batch of recycled material to determine the exact lead content. Even if it is not proven that the level of lead content is exceeding this threshold we suggest that a declaration should be made preventively. Although it is a legal requirement it can be explained to customers in a positive way due to the ecological benefits of recycling.


EPPA recommends to adding the notification below to delivery documents for all products which contain recycled PVC-U material with lead stabilized content. We have formulated the statement after deep and exhaustive consultation with experts throughout the PVC-U network.

Proposed Statement

 **Information acc. Art. 33 REACH: Due to the environmental and ecological benefits of including recycled material the present product may contain more than 0.1% of lead stabilizers. These lead compounds are encapsulated in the polymer matrix and under normal conditions are not released during the service life of the product. For more information please visit www.eppa-profiles.org, DOWNLOADS**

 **Informationspflicht gem. Art. 33 REACH-Verordnung (EG Nr. 1907/2006): aufgrund des ökologisch vorteilhaften Einsatzes von Recycling-Material kann der Artikel mehr als 0,1% Bleistabilisatoren enthalten. Es sind keine besonderen Vorsichtsmaßnahmen im Umgang mit dem Artikel erforderlich, da der Stoff fest im Kunststoff eingebunden ist und bei bestimmungsgemäßem Gebrauch nicht freigesetzt wird. Weitere Informationen finden Sie auf www.eppa-profiles.org, DOWNLOADS**

 **Obligation d'information selon l'article 33 du règlement REACH (CE n° 1907/2006): L'article contient des matières recyclées car elles contribuent positivement à l'environnement. En conséquence, le produit objet de cette déclaration peut contenir plus de 0.1% de stabilisants au plomb. Dans des conditions normales d'utilisation, les composés à base de plomb sont encapsulés dans le polymère et ne sont pas libérés par celui-ci. Pour de plus amples informations, merci de vous référer au site web www.eppa-profiles.org, DOWNLOADS**

 **Note per l'obbligo d'informazione dell'articolo 33 del regolamento REACH (CE 1907/2006) per i profili che possono contenere materiale riciclato da finestre vecchie. In base all'uso conveniente ecologicamente di materiale riciclato, l'articolo può contenere più di 0,1 % di stabilizzanti al piombo. Non ci sono particolari**

¹ Regulation (EC) No 1907/2006, art 33 of the European Parliament and of the Council

precauzioni nel maneggiare la voce desiderata, quanto la sostanza è saldamente integrato nella plastica e non sarà liberato nelle normali condizioni d'uso.



Notes regarding profiles containing used window recyclate pursuant to the duty to inform as laid down in Article 33 of the REACH Regulation (EC) No. 1907/2006

Due to the environmental and ecological benefits of including recycled material the present product may contain more than 0.1% of lead stabilizers. These lead compounds are encapsulated in the polymer matrix and under normal conditions are not released during the service life of the product.

Dear Customer

The delivery paperwork for your profiles or windows advises you that your new PVC-U window profiles might contain lead compounds which include Substances of Very High Concern (SVHC). The REACH Regulation on chemicals obliges us to inform you of this, but we would also like to provide you with some of the technical background.

The materials that require declaration have been incorporated into the new products through the use of recycled material obtained from used windows. These materials were used for many years in lead stabilisers for PVC, as this was the standard technology in use at the time. In their pure form, they are harmful; however, during their extrusion into window profiles, these materials are incorporated in a fixed and insoluble form into the plastic. As a result, handling the profiles – and the material – is harmless and safe.

This applies both for the lifetime of the window and to the process of recycling used windows, which is becoming increasingly important. The VinylPlus Programme envisages that by 2020 throughout Europe 240,000 tonnes of PVC recovered from used windows will be re-used in the production of new insulated window profiles as an ecologically sound recycling measure.

This involves using state-of-the-art processing technology which guarantees safe handling and ensures the highest product quality standards.

The duty to inform laid down in Article 33 of REACH relates to a series of lead compounds which are named on the Candidate List (URL). However, as these were already in the plastic material, it is no longer possible to detect specifically which compounds were used. We are therefore advising you as

a preventative measure of the possible presence of substances which are subject to the duty of disclosure.

REACH also includes the duty to advise your own trade customers accordingly. Any enquiries received from consumers must be answered within 45 days in accordance with REACH Art 33 Para 2. The stabilisers now in use are based on calcium and zinc compounds.

Therefore, for profiles without used window content the declaration in accordance with REACH Art. 33 do not apply.

You are welcome to make use of this information for your own purposes.



Erläuterungen zur Informationspflicht nach Art. 33 REACH-Verordnung (EG Nr. 1907/2006) für Profile, die Rezyklat aus Altfenstern enthalten können.

Aufgrund des ökologisch vorteilhaften Einsatzes von Recycling-Material kann der Artikel mehr als 0,1% der zu deklarierenden Bleiverbindungen enthalten. Es sind keine besonderen Vorsichtsmaßnahmen im Umgang mit dem Artikel erforderlich, da der Stoff fest im Kunststoff eingebunden ist und bei bestimmungsgemäßem Gebrauch nicht freigesetzt wird.

Sehr geehrte Kunden!

auf den Lieferpapieren Ihrer Profile oder Fenster wurde Ihnen mitgeteilt, dass Ihre neu erworbenen Kunststoffprofile Bleiverbindungen enthalten können, die zu den besorgniserregenden Stoffen, den sog. SVHC-Substanzen (Substances of Very High Concern) gehören. Wir sind gemäß der Chemikalienverordnung REACH verpflichtet, dies mitzuteilen, möchten Ihnen aber gerne den technischen Hintergrund erläutern.

Die zu deklarierenden Stoffe gelangen über rezykliertes Altfenstermaterial in die neuen Produkte. Sie waren lange Jahre entsprechend dem damaligen Stand der Technik in Bleistabilisatoren für PVC eingesetzt. In ihrer Reinform sind sie gesundheitsschädlich, während der Extrusion zu Fensterprofilen werden diese Stoffe jedoch fest und unlöslich in den Kunststoff eingebunden. Damit ist der Umgang mit den Profilen und auch dem Werkstoff unbedenklich und sicher.

Dies gilt sowohl für die Lebenszeit des Fensters als auch für den Recyclingprozess von Altfenstern, der zunehmend an Bedeutung gewinnt. Über das Programm Vinylplus werden bis 2020 europaweit

240.000 to PVC aus Altfenstern einer ökologisch sinnvollen Wiederverwendung in neuen, hochwärmedämmenden Fensterprofilen zugeführt.

Hierbei kommen modernste Verarbeitungstechnologien zum Einsatz, die den sicheren Umgang gewährleisten und höchste Produktqualität sicherstellen.

Die Informationspflicht gem. Art 33 REACH bezieht sich auf eine Reihe von Bleiverbindungen, die auf der Kandidatenliste (URL) benannt sind. Im Kunststoff lässt sich nicht mehr nachweisen, welche Verbindungen im Einzelnen verwendet wurden. Wir informieren Sie daher präventiv über das mögliche Vorhandensein informationspflichtiger Stoffe.

Gemäß REACH sind Sie verpflichtet, ihre gewerblichen Kunden entsprechend zu informieren. Nachfragen von Endverbrauchern müssen gemäß Artikel 33, Abs. 2 binnen 45 Tagen beantwortet werden.

Heutzutage werden Stabilisatoren auf Basis von Calcium- und Zink-Verbindungen eingesetzt. Für Profile ohne Altfenster-Anteil entfällt daher die Deklaration gem. REACH Art. 33.

Gerne können Sie auf die vorliegende Information zurückgreifen.



Gentile cliente!

sulla bolla di consegna dei vostri profili o finestre è stato indicato che il vostro profilo sintetico quale avete appena acquistato può contenere del composto di piombo, quale possono contenere delle sostanze preoccupanti, come la cosiddetta sostanza SVHC (Substances of Very High Concern).

Secondo il regolamento Chemicals REACH siamo in conformità di notificare però vogliamo spiegare il background tecnico.

Le sostanze da dichiarare nel prodotto nuovo subentrano tramite il materiale delle finestre vecchie riciclato. Queste sostanze sono stati inseriti per diversi anni secondo il livello tecnico di quei tempi nei stabilizzatori del piombo per PVC. Queste sostanze nella loro forma naturale sono nocivi per la salute, mentre nella estrusione queste sostanze vengono saldamente e insolubilmente in sintetico. In questo modo l'uso dei profili e anche il materiale è innocuo e sicuro.

Questo vale sia per il tempo di vita della finestra che per il processo di riciclo di finestre vecchie, con cui cresce l'importanza nel passare del tempo. Con il programma Vinylplus entro il 2020 in tutta Europa saranno inseriti 240.000 tonnellate di PVC di finestre vecchie ecologicamente in un nuovo profilo di finestra con isolamento termico elevato.

A questo proposito vengono utilizzati le più recenti tecnologie di lavorazione per garantire una gestione sicura e assicurare la qualità massima del prodotto.

L'obbligo di segnalazione secondo l'articolo 33 REACH si riferisce ad una serie di composti di piombo elencati nella lista dei candidati (URL). Nella plastica non è più possibile indicare in dettaglio quali



composto sono stati utilizzati. Quindi informiamo preventivamente la possibile presenza di sostanze di materie che sono obbligate ad essere indicate.

In base a REACH, di conseguenza siete tenuti a informare i vostri clienti. Richieste degli consumatori finali devono essere risolte in conformità dell'articolo 33, paragrafo 2 entro 45 giorni.

Oggi vengono utilizzati stabilizzanti sulla base di composti di calcio e zinco. Pertanto, per i profili quali non abbiano una componente di finestre vecchie viene annullato la dichiarazione secondo REACH articolo 33.

Naturalmente si può attingere su queste informazioni.

Gerald Feigenbutz

Brussels, May 16th 2013