

EuroWindowor follow up on Consultation Forum 30/9 2015

After the Consultation Forum on windows that took place on 30/9 2015, EuroWindowor would like to thank the European Commission, Member States and the various stakeholders for the fruitful discussion.

The exchange of views made clear that there is wide recognition that windows are complex products having a crucial role in Europe's buildings energy efficiency and that an EU Energy Label is not "the silver bullet" and the simple solution to better exploit that potential. Many important questions were raised that need to be worked through before going ahead: link with existing legislation such as the Energy Performance of Buildings Directive and the Construction Products Regulation, costs for SMEs, customer journey, how to trigger renovation, the importance of the specific climatic and building situation and the window's orientation and location on the building etc. The Consultation Forum revealed a significant misfit between the important objective of the European Commission to drive building and window energy efficiency and the EU Energy Label as the chosen tool.

The discussions highlighted the concerns we emphasized in our two position papers ([1st July 2015](#) and [25th September 2015](#)) and strengthened EuroWindowor's conviction that an EU Energy label for windows is inappropriate from a consumer and environmental perspective. Such a label would often not guide the consumers towards the most energy- and cost optimal products across Europe and would very likely not deliver the benefits expected from its introduction. A simple "one size fits all" EU energy label is not able to integrate all the complex parameters on the basis of which consumers' choice is made. It does not make sense for façade windows, and it does definitely not make sense for roof windows, given the highly efficient energy saving level reached and their limited market share. A more effective and cost-efficient approach should be found that responds to the reality of how windows are sold and to the real context that determines individual window energy performance.

An analysis from Ecofys furthermore shows that a large part of the energy savings is already foreseen in the underlying BAU scenario presented in the preparatory study due to building regulations, market development and demand. Actually, 91% energy savings for residential windows compared to 2010 are already achieved till 2050 through the legislative and market development without introducing the EU energy label (Ecofys study, September 2015).

Some alternative solutions to the introduction of an EU energy label for windows were mentioned during the Consultation Forum. EuroWindowor and its members are committed to continuously improving energy efficiency in buildings and are therefore keen on working with the European Commission, with Member States and with the various stakeholders to discuss these alternatives and ultimately reduce dependency on fossil fuels, reduce carbon emissions and improve security of supply of fuels.

In this context, we welcome the acknowledgment that windows play a key role in the improvement of the energy efficiency of buildings and the strong support to the energy balance approach. The Energy Balance approach is already included in the Energy Performance of Buildings Directive (EPBD), where article 3 and article 4 require that Member States apply a methodology (specified in Annex I) for calculating the energy performance of buildings and building elements that form part of the building envelope, which is to include e.g. passive solar gains. As we observe this approach not yet to be strictly applied throughout Europe, we consider that the upcoming revision of EPBD will be an excellent opportunity to emphasize and stress the importance to comply with an elaborated energy balance approach. Not just for new buildings, and not just for major renovations but also for elements of the building envelope like windows. The energy balance approach has so far only been implemented for renovation and replacement in few Member States (e.g. UK and Denmark). In e.g. Denmark the energy



performance requirements is based on energy balance formulas for façade- and roof windows, and thereby taking more than just U-value in to consideration when setting energy performance requirements for windows in building regulation.

Setting cost optimal requirements expressed by the energy balance approach (U_w , g_w , air permeability and the effect of shutters) in national building legislation, and based on the specific cooling and heating context will reduce energy consumption in buildings. The introduction of NZEB by 2020 which ideally are to be cost-optimal, and Member States timely setting related energy requirements for replacement of building envelope elements based on differentiated energy balance approach will trigger continued innovation within industry in an energy efficient and sustainable way.

The differentiated Energy Balance concept for renovation and replacement should be emphasized in the reviewed EPBD, by updating article 4.1 and article 7, and by possibly developing a guidance sheet on what and how to include energy balance calculations of windows in national building legislation. Member States are to set the right balance between e.g. the heating and cooling factors in regulation, and to create the best link in the specific climatic context to other relevant regulated performances of buildings or products. In addition setting long-term requirements within Member States has proven to trigger long-term development within the sector. We therefore also suggest this to be further included in the EPBD. EuroWindoor made some more proposals for improvements of the EPBD in the [EuroWindoor reply to the EPBD Public Consultation questionnaire](#).

All of the above will be in line with the recommendations in the preparatory study and the Explanatory Memorandum prepared by the Commission. The work done so far in developing the energy balance formulas in the preparatory study can be used as a starting point combined with the work within Member States to e.g. define reference buildings in accordance with EPBD.

We would be happy to discuss our views in details.

Annex:

- Ecofys report, September 2015

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 12 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 fore front 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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