DOVISTA A/S
Position on the

CONSULTATION DOCUMENT

on the revision of the Energy Labelling Directive 92/75/EEC of 22 September 1992 on the indication by labelling and standard product information of the consumption of energy and other resources by household appliances

DOVISTA A/S is the parent company of a steadily growing DOVISTA Group, which comprises strategic business units focused on the development, manufacture and sale of windows and doors. Our nine brands, among others VELFAC, Rationel, SP Fönster and Natre, are represented in seven European countries.

The DOVISTA Group – through its sales and production companies – employs 4,000 people in Europe. DOVISTA A/S is owned by VKR Holding A/S, a company founded in 1941 by Villum Kann Rasmussen and today one of Denmark's largest and most reputable industrial groups. The DOVISTA Group builds its activities upon the solid corporate values of its owners, VKR Holding A/S. We focus as a company on our responsibilities to our employees, the environment, the wider community, and society in general.

We hereby allow ourselves to comment on the consultation paper focusing only on **windows**.

We support a new and coherent labelling of energy performance for windows that does not create trade barriers, but the following should be included in a labelling scheme:

- The **energy balance** (solar gain – heat loss air permeability) in kWh/m2
- The **dynamic performance** in KWh/m2 using external shadings during winter
- The dynamic value for **shading** (g) of the window during summer period
- The ventilation value during **natural ventilation** for summer period
- **Daylight** figures and the savings from the utilization of the daylight in kWh/m2

A proper labelling scheme that takes into consideration the above mentioned points can contribute positively to climate migration, competiveness and a sustainable and long term product policy. But if these points (energy balance approach) are not taken into consideration, also including the different climate zones for member states, it can have the opposite effect.