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European Commission  
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**EuroWindoors 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**

EuroWindoor is an umbrella organization of the European associations of fenestration and door sector FAECF, FEMIB, EPW and UEMV for the three frame materials metal, wood and plastic and the infill material glass. On a European scale EuroWindoor represents more than 50.000 companies and more than one million employees. The European window industry is mostly an industry which consists of small and medium sized companies, with local employees. In view of the construction supply chain, the window industry supplies local construction companies with building components and is thereby a part of a local supply chain with local employment.

The fenestration industry feels responsible for giving good answers and good solutions to the different urgent questions that our European community is confronted with, such as safety, health, environment and of course energy.

Therefore EuroWindoor and its member organisations take the opportunity to react from this responsibility and are willing to contribute and cooperate to find good and sustainable solutions to the mentioned problems.

As written above the scope of your questions concerns *“labelling and standard product information of the consumption of energy and other resources by household appliances”*.

Our products are completely different from your scope because they are part of the energy system of a building and are gaining energy, transporting energy and storing energy as well. A simple label is not appropriate to describe the capacities and characteristics of our products, but in spite of this fact we will of course answer your questions.

EPW: European Plastic Window Association  
 FAECF: Federation of European Window and Curtain Wall Manufacturers' Association  
 FEMIB: Federation of the European Building Joinery Associations  
 UEMV: European Glaziers Association

The following answers to the consultation paper are focusing on windows only.

### **1 How do you suggest the Commission could best ensure coherent product policy?**

To ensure a coherent product policy, the commission needs to coordinate its activities between the most important directorates. There is a need for a coordination of the different requirements in the different directives. At the moment window manufacturers are preparing themselves for CE-labelling under the CPD as well as they are preparing themselves to supply the construction sector with information needed from the EPBD. At the moment both the CDP and the EPBD are undergoing revisions that will affect the window industry asking for more information and communication.

A coherent product policy from the commission must take into consideration the many different pieces of information the industry is asked to give.

A coherent product policy must at the same time make sure that the technical basis is equal in the member states in order to secure an open internal market for construction products.

On the long term it will be valuable that the product policy is stable and focused on both short and long terms. With this in mind a long term program from now until 2020 could be valuable.

### **2 Do you agree to the general principle of reinforcing the use of energy labelling in order to more vigorously contribute to the Union's objectives on climate mitigation, competitiveness and sustainable product policy?**

Energy labelling has been extremely valuable for white goods and other products that have the same energy performance all over Europe. However it is useful to consider that these goods and products are standing alone and are not part of a building or of other complicated systems.

As the climate in Northern Europe, Central Europe and Southern Europe is very different it can be difficult to develop one labelling scheme for all Europe. A research project EWERS under the SAVE programme identified the problem, but never developed a final proposal for an energy label.

EuroWindow considers a label as a communication tool. It is an instrument at the end of a chain of activities and it is not a reason or a starting point for those activities. But we feel responsible and like to concentrate on practical solutions from our industry and so finally we may choose a tool for communication such as a label.

An important focus area is that a window has different energy performances depending on climate and season. A window is related to energy transport and there are for example solar gains through it which reduces the need for heating, a window is used for natural ventilation reducing the need for air-conditioning, as well as a window can have integrated shadings which also reduce the need for air-conditioning and finally a window supplies daylight and save energy for lighting.

In the end a labelling scheme for windows should for example include information on

- the energy balance (energy transport – solar gain) in kWh/m<sup>2</sup>,
- the shading and ventilation of the window during the summer period,
- daylight figures and the savings from the utilization of daylight in kWh/m<sup>2</sup>
- and other important aspects related to performances that are relevant during the lifecycle of a building

A proper labelling scheme that takes into consideration all the above items can contribute to climate migrations, energy gain and energy saving, competitiveness and a sustainable product policy. But if it does not take into consideration all the above and if it does not consider different climate conditions, it can have the opposite effect.

A proper energy label shall focus on end users and those areas where the end users can make a difference when buying. For new windows in new buildings, the decision is often taken by the professionals and in that case the technical values from the CE-label are sufficient.

Regarding competitiveness it is also important to keep in mind the internal market. An energy or other labelling scheme must not create trade barriers between countries and the costs should also be kept as low as possible.

**3 For energy-using products, would you favour the use of an energy label focusing on the energy consumption at use or of an 'eco-design label', (near to the Eco-label showing the 'best') giving the global environmental performance of the product throughout its life-cycle?**

A window is not an energy consuming product. But when we look at the performances and characteristics it might be helpful for communication purposes to have a tool. For windows the most important period is time in use. Different studies show that the energy used for production and removal of a window is negligible compared with its energy behaviour during its "lifetime". Therefore the objective to have the customer choose the most efficient product, can and will only be reached by giving the correct and complete information about all the characteristics available during the life-cycle.

The windows environmental requirements to materials etc. will be regulated through the new revision of the CPD.

**4 Are you in favour of adding CO<sub>2</sub> on the energy label? How could reliable information be assured in the light of different energy mixes in the 27 Member States?**

No. See above.

**5 Are you in favour of adding annual running costs on the energy label? How could reliable information be assured in the light of different energy prices in the 27 Member States?**

No, we aren't in favour for adding commercial information.

**6 Would you like to add other products to the scope of the labelling Directive than those covered at present (household appliances only)? If yes, which products would you suggest (non-household or non energy-using products, 'energy-relevant' product, services such as holiday packages or other)?**

No, and we have no further suggestions.

**7 In view of dynamic labelling, which approach would you suggest for the transition from an existing labelling scheme to a new labelling classification in order to cause minimum distortions?**

We are in favour of one, to average consumers comprehensible, general information tool instead of many different labels. At this moment we think that the CE marking tool is the most important tool for European communication about our products.

**8 Do you want to propose an alternative route beyond the considerations in this document?**

As the energy performance of windows depends on the climate situation where they are installed, it could be valuable to develop an European system that is not influenced by the local conditions.

Here the CE-labelling and the CPD values could be used. It is required that the manufacturer informs about U-values, g-value and daylight factor and other relevant factors.

We would greatly appreciate if the Commission would consider our inputs for the further drafting of the revision and we would of course be pleased to discuss our concerns further with you when appropriate.

Yours sincerely

EuroWindowor  
The Chairman

A handwritten signature in black ink, appearing to read 'Franz Hauk', written in a cursive style.

Franz Hauk