



GLASS FOR EUROPE

Europe's Manufacturers of Building, Automotive and Transport Glass

Glass for Europe submission to the European Commission 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

Glass for Europe is the trade association for Europe's manufacturers of building, automotive, and transport glass.

Energy issues are key to the building glass industry as our products can make an important contribution to combating climate change and attaining the ambitious goal set by the EU's heads of state and government to reduce CO₂ emissions by at least 20% by 2020.

Low-emissivity, or "Low-E", glass helps prevent unwanted heat loss from buildings and houses, while solar-control glass helps reduce solar heating where it is undesirable and thus reduces energy spent on air-conditioning. These technologies, separately and in combination with each other as well as with double- and triple-glazing technologies, represent a significant contribution from the glass industry to our common fight against climate change. Every policy measure that encourages the adoption of these technologies by both consumers and the construction sector is welcome. A labelling scheme that clearly encourages the use of more energy-conserving glazing technologies would be such a policy.

Energy labelling of windows has been introduced in, for example, Denmark, Finland, and the UK with considerable success. There is every reason to believe that, if designed appropriately and taking into account the greater variation of climates and construction practices across Europe, an EU-wide scheme could be highly beneficial to the environment.

Glass for Europe therefore supports, in principle, extending energy labelling to windows, as long as it is simple yet dynamic, provides an easy and effective decision-making aid for consumers, architects and other specifiers, enables Member States to harness it for their own incentive and promotion programmes to speed uptake of the most efficient products and, overall, represents a tangible and cost-effective benefit to the environment.



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(1) How do you suggest the Commission could best ensure coherent product policy?

It is essential that the Commission take account of three elements as it proceeds to expand the use of the energy labelling scheme to windows:

- The need to ensure that the labelling scheme:
 - Is coherent with technical performance requirements (e.g. appropriate information linked with CE marking the International Standard currently being prepared on the Energy Rating of Windows (draft ISO 18292 “Energy Performance of Fenestration Systems – Calculation Procedure)).
 - Informs consumers simply, clearly and effectively across the EU.
 - Is dynamic and forward looking and will not need to be revised for some time.
 - Takes into account the fact that climates and building practices differ considerably between one part of Europe and another.
 - A product that, in terms of energy conservation, may be very favourable in Scandinavia may not be optimum in the Mediterranean, and vice versa. Nevertheless it is necessary to have a system that provides the same information in a consistent manner.
 - Thus, the requirement for localisation of the ratings will need to be planned for.
- The need to promote effective market surveillance by Member State authorities to ensure that the products carrying a label in the market actually meet the performance claims made by the label. We are aware that this is an issue in other product sectors. Clearly, product policy is only coherent when the requirements are met and respected by all the market players. There can be zero tolerance for free-riders who gain a cost advantage in the market in an unfair, fraudulent way.
- The need to ensure that there is real market uptake (for both new and replacement applications) of the top performing products. It is of no use to promote development of more efficient products or for top performing products to be “available” – they must be purchased and installed for there to be progress. Member States must play a greater role in promoting uptake of top performing products.

The layout and design, the display rules, and other aspects of the label should be mandatory and consistent across the EU.

(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?

Glass for Europe strongly believes that extending the EU energy labelling scheme to windows, if done appropriately, will contribute to the achievement of the Union’s objectives on climate mitigation, competitiveness, and sustainable product policy by catalysing a shift in the market for windows towards more energy-conserving models and technologies. This will not only directly reduce the energy consumption of houses and buildings; it will also motivate, stimulate, and help finance ongoing research and development, keeping Europe ahead of the game technologically and creating jobs and other opportunities.



(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?

Glass For Europe favours simplicity and clarity of information, as this is the route to the most effective label. Therefore, we support labelling based on direct energy performance during use. A more general "eco-label" or a more complex approach involving life-cycle considerations would be extremely difficult to manage in practice; would potentially confuse those for whom the information is intended, and would ultimately not be the most effective way of using labelling to stimulate a move towards greater use of the most energy-efficient products. Furthermore, in the case of windows, the energy performance during use is by such a large factor the most important aspect of the life-cycle that there is no convincing argument for including other information of only marginal impact/interest/relevance which will introduce complexity and inevitably result in delays to getting any EU-wide label into operation.

(4) Are you in favour of adding CO₂ on the energy label? How could reliable information be assured in the light of different energy mixes in the 27 Member States?

Similarly to our answer to question (3), if the energy label is extended to windows, Glass for Europe believes that the most efficient option would be to focus on the energy saving performance of a window. Trying to extrapolate the carbon footprint would be complex, particularly in the light of the differing energy mixes across Europe. It would also reduce clarity: the clearest message is the simplest, and we believe that simple energy performance is what needs to be communicated in the foreseeable future to achieve the goals which the EU has set for itself.

(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?

Similarly to our answers to (3) and (4), we believe that simpler is better, and that, furthermore, trying to add this type of information would be very difficult – if not misleading – in practice. As heating and cooling systems and energy prices are different across the free energy market of EU member states, including running costs on the energy label is unrealistic. It could also prove to be unreliable, as it is difficult to reflect the individual circumstances of different consumers across Europe. Glass for Europe believes that the EU energy label needs to primarily remain a marketing tool that should offer simple and accurate 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)?

Glass for Europe supports the extension of the EU energy labelling scheme, appropriately adapted, to windows. Different types of glass we have developed over the years, particularly low-emissivity glass and solar-control glass, as well as double and triple glazing technologies, can significantly reduce the need for heating and cooling in buildings, thereby reducing energy consumption and associated CO₂ emissions.



As part of a coherent product policy, a dynamic energy efficiency label could contribute significantly to the uptake of top performing products and thereby enhance the EU's effort to improve energy efficiency, reduce energy dependence and help tackle climate change.

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

Glass for Europe recognises the advantages of a dynamic labelling system to promote the uptake of the top performing products. We further recognise the additional advantage of, if possible, introducing a system that will not seem entirely unfamiliar to users. Accordingly, the familiar layout of the existing labels should be a starting point. These goals are not incompatible and the open-ended system proposed by the household appliances industry offers an example of how these challenges could be met. It is too early to say whether the approach advocated by CECED would be appropriate for our products/sector but nothing suggests that it would fundamentally not be.

Glass for Europe particularly encourages the use of an energy labelling system that would enhance Member State promotion efforts (e.g. use of economic or fiscal instruments) to get the top performing technologies into use in practice.