

EuroWindowor response to EU winter package: Don't forget buildings are for people to live in!



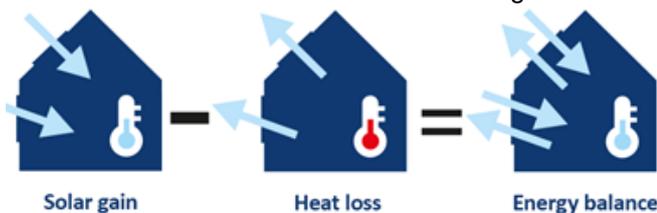
EuroWindowor as a strong supporter of the EPBD welcomes the winter package of the European Commission, but fears a sole energy efficiency focus on buildings leaving out key aspects supporting healthy and comfortable living.

EuroWindowor supports the proposal from the EU Commission of a binding 30 % energy efficiency target in 2030. The cheapest and cleanest energy is, no matter what, that unused! Buildings account for about 40 % of the total energy consumption in Europe. Hence EuroWindowor favours constructive improvements that will strengthen the EPBD's contribution to the EU's energy and climate goals.

But EuroWindowor see a clear missing link: People spend up to 90% of their time in buildings with poor daylight and indoor climate.

"The revised EPBD has included stronger focus on health aspects, and the importance of having a holistic approach to buildings, but it can still be further elaborated and key is the implementation in Member States legislation", says President Joachim Oberrauch. "Increasing energy efficiency in buildings can go hand in hand with good daylight conditions and a healthy indoor environment, but only if proper attention is paid to this when setting requirements. At the moment daylight and indoor climate aspects are not very much highlighted in the EPBD and hence implemented very weakly in most Member States in national building legislations".

EuroWindowor misses another important link: The EPBD fails to emphasize the importance of windows not only preventing heat loss, but also being providers of energy gains through the windows.



Infographics
"Energy balance"

Vasco Ferreira from the EC (DG ENER) meets EuroWindowor



Vasco Ferreira
(picture from Twitter account @ferreirav2020)

EuroWindowor welcomed **Mr. Vasco Ferreira** (Policy Officer from the European Commission DG ENER, Unit C.3 Energy Efficiency) as

guest speaker at the Directing Council Meeting in Brussels on 03/11/2016. Mr. Ferreira reported about the review of the current EPBD and the plans of the European Commission, which will be published in an "energy package" on 30/11/2016. Key issues to be included in the revised EPBD:

- 1) **Simplification**
- 2) **Modernization** (e.g. ITC for electronic inspection monitoring, charging points for e-vehicles)
- 3) **Strengthening** (e.g. aggregation of renovation projects, reducing risks and getting public funding)

EuroWindowor missed in the revision of the EPBD the **incentive for renovation, the consideration of the energy balance, indoor air quality and natural daylight**. Mr. Ferreira agreed that the building code should include also natural lighting & indoor air quality and highlighted the link to the up-coming EPBD standards.

CPR Implementation technical platforms



The CPR implementation report from the EC identified four main issues that require improvement. The EC therefore launched a series of technical platform meetings to get input from relevant stakeholders. The first meeting was held on 12th October under the heading "Standardisation under the CPR". To streamline and structure the discussion the EC had before

the meeting circulated a discussion document where they listed three specific topics for discussion; "Scope of CPR-based harmonisation", "Voluntary or mandatory hENs" and "Exhaustiveness of hENs".

EuroWindowor was present at the meeting and stressed the importance of securing that mandates are exhaustive and easily accessible for the standardisers, but that it is important to allow also voluntary parts of hENs.

This view was shared and supported by several other stakeholders present at the meeting. The next technical platform meeting is planned under the heading "Article 9(2) (simplification of CE marking)" and EuroWindowor is willing to be present again. The last two meetings will cover the topics "Simplified procedures for SME's" and "EOTA matters". Unfortunately the announced dates from October have been postponed which causes delay.

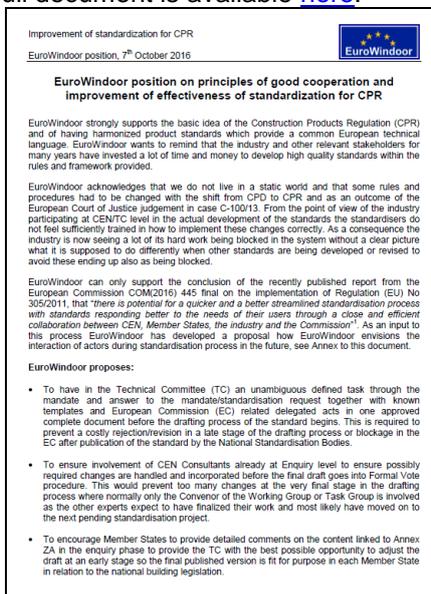


EuroWindow position on principles of good cooperation and improvement of effectiveness of standardization for CPR



As also concluded by the European Commission in their evaluation report on the CPR implementation "COM(2016) 445final" there is room for improvement in the process of developing harmonized product standards under the CPR. Members of EuroWindow participate actively in the standardization work and have through this work experienced the difficulties of having candidate harmonized standards finally approved and listed in OJEU. EuroWindow is therefore pleased to read in the report that EC is encouraging a closer and more efficient collaboration between all the stakeholders involved in the process. As an input to this EuroWindow has developed a position paper with specific proposals as to how the European window, door and façade industry envisions the interaction of actors

during standardization process in the future. The proposal will be used as basis for further dialogue with the EC and other relevant stakeholders. The full document is available [here](#).



RoHS exemption for profiles containing recovered PVC



EuroWindow filed in cooperation with EPPA the RoHS application for exemption of use of recycled PVC for profiles of windows and doors with electric and/or electronic devices. Subject of the request is to grand derogation from the directive for cadmium and lead in recovered PVC used for profiles of windows and doors with electrical function. However, the information and data included in the application form is mostly related to recycled PVC window profiles in general. The Commission contracted BiPRO in Munich to run the process in collaboration with EuroWindow and EPPA. Recently the European Stakeholder Consultation ran from October 28th to December 9th, 2016. EuroWindow expects a positive assessment by the stakeholders.

Strong cooperation in the joint position to the revision of the EPBD: "Tapping the potential of windows"

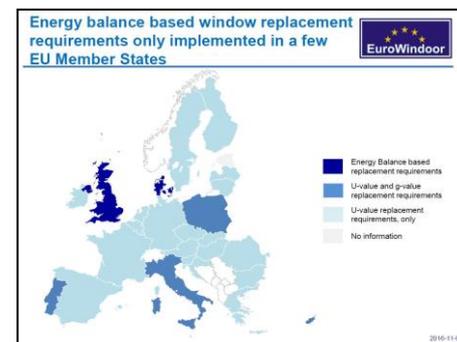


EuroWindow joins strong industry position supporting to call for a modernised EPBD to unleash the energy savings potential of high performing windows. In a strong cooperation with European Aluminium, ES-SO and Glas for Europe the Joint Position Paper "Tapping the potential of windows" was published on November 9th, 2016. Windows and glazed areas in buildings are essential to the overall energy performance of buildings, but

also to the general comfort and well-being of people living and working in these buildings. In the joint position paper issued the signatories call on the European Commission to consider three priorities ahead of its review of the EPBD:

1. Increasing the renovation rate of European buildings to obtain larger energy use reductions
2. Using the energy balance approach to assess the energy performance of windows. Only GB and DK have implemented the energy balance for replacement in their national requirements.

3. Recognising the benefits of daylight, natural ventilation and solar management



(Infographics "energy balance map" [click here](#))

Appointments 2017

- 16-21/1/2017: Fair BAU 2017, Munich / Germany
 15/03/2017: EuroWindow Directing Council and General Assembly, Frankfurt / Germany
 06-07/07/2017: EuroWindow Directing Council, Stockholm / Sweden
 14/11/2017: EuroWindow Directing Council, Brussels / Belgium



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