



EuroWindoor feedback on the ESPR consultation

EuroWindoor appreciates the opportunity to give feedback to the proposal on *Ecodesign for Sustainable Product Regulation (ESPR)* from the European Commission.

EuroWindoor supports the aim of making sustainable products the norm while at the same time strengthening a level playing field with a fair and smooth functioning internal market. These are essential elements in achieving the EU's objectives of climate neutrality and creating a circular economy. EuroWindoor also welcomes the changed focus of the scope to now include resource efficiency in a life cycle perspective alongside energy related aspects.

EuroWindoor would however like to stress the importance of ensuring a close coordination and alignment between the ESPR and those other legislative initiatives under development/revision all affecting the building sector. That being e.g. the Construction Product Regulation (CPR), the Energy Efficiency Directive (EED), the Energy Performance of Building Directive (EPBD) as well as the work on the Roadmap on whole life carbon emissions of buildings. A successful outcome will depend on the specific interaction between the legislations and on their ability to support and supplement each other whereas overlapping's should be avoided. For example, should information requirements related to the Digital Product Passport (DPP) be connected to and aligned with other databases, e.g. the SCIP database to avoid uploading the same information in different ways.

It is very positive that requirements will continue to be set on a product-by-product basis taking into account individual specificities and characteristics of the different products. EuroWindoor would like to underline the importance of involving all relevant actors – including industry and Member States in the development and implementation of such product specific regulations so no deviations on methods to assess and verify product performance or how to deliver product information will appear. This to ensure that potential costs and burdens associated with requirements on products and their value chain, such as information requirements via a DPP will be proportional to the value a given information provides in relation to reducing negative environmental and climate impact. Close cooperation between the relevant actors will also help ensuring that conflicting requirements are not introduced. For example, some requirements may impact the safety or durability of products, or longer lasting designs may be more difficult to repair. Another example is that higher energy efficiency levels in some applications may lead to an increased need for materials, which means more resources and a larger environmental footprint. Furthermore the use of different materials in similar products (e.g. window framing made of PVC, metal or wood) will need different relevant Ecodesign requirements in the same product group.

It is fundamental that requirements will be based on scientific assessment methods through recognised European and International standards that are reliable and verifiable. For construction products this means specifically that it is essential to have continued focus on the assessment of the performance of construction products at building level due to the different construction traditions and climate conditions across EU, which implies a modular approach in the assessment of environmental performance from cradle to grave, as in EN 15804, and that performance requirements are based on national regulation.

For the same reason EuroWindoor does not support classes of performance labels (traffic light) on construction products as a product itself may be environmentally superior but at the same time it may in the operation and building context be inferior – both in terms of environmental and technical performance. Such a label could therefore easily be misleading. Introducing benchmarking on simple environmental aspects such as recycled content or best technical properties is also not recommendable as it does not provide a comprehensive sustainability performance. Only a single CE marking should be required for products giving the information on the performance of construction products.

About EuroWindowor AISBL – EuroWindowor AISBL was founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 19 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 forefront 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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