EU Energy Labeling for windows: Added value across Europe for consumers & business and better regulation?

EuroWindoor welcomes the publication of the final reports of the Preparatory Study in the Ecodesign/Energy Labelling process for windows (Lot 32) and welcomes the strong support to that energy performance of windows should be based on more than just heat loss (U-value), as solar gain also has a large impact on the energy performance of windows.

However, we do not agree with the recommendations of the Preparatory Study, as we question the added value of a potential EU Energy Label. We therefore call upon the European Commission to alternatively consider other instruments such as the Energy Performance of Buildings Directive (EPBD) and the Construction Product Regulation (CPR) to drive consumers to choose best performing windows respecting the local conditions and building style in order to deliver energy savings, cost efficiency and comfort in buildings while taking into account the complexity of windows.

1. The specific characteristics of windows

The preparatory study and the comments of the various stakeholders during this process have highlighted that windows are multifunctional and often customized products. Windows are energy-*related* products and their specificities, as compared to energy-*using* products such as electronic and white goods, should be acknowledged and taken into consideration. EU energy labels have indeed proven to be successful for energy consuming products like white goods and electronics, but transferring an EU Energy Label to products that interacts in a specific climate and building style in different Member States with different building regulations and traditions is not advisable.

First, several factors, such as climatic conditions, time of day, orientation of the window, time of the year, etc. influence heat loss and heat gain of a specific window and in addition, energy savings depend on the specific building the window is installed in and the climatic condition. This is also documented in the preparatory study.

Secondly, the purchase situation for windows is different from white goods and electronics and in most cases similar to B2B rather that to B2C purchase but with huge variations across the 28 member states. Installers, specifiers etc. play a key role in the consumers' purchase decisions as they provide advice on which product is the most suitable for the specific building. This is also highlighted in the preparatory study.

Thirdly, what triggers renovation and replacement is hardly ever limited to energy considerations only, but to other triggers like ensuring healthy, comfortable, better and modernized buildings. We know from several consumer surveys and by interacting with our customers, that key drivers are issues like getting more daylight, avoiding over-heating, update design (incl. the visual expression of the building), safety and burglar resistance, noise reduction and of course – last but not least - cost considerations. An EU Energy label should not suppress those other key features, but help guide consumers to the best solution both with regards to features, energy consumption, comfort and overall cost.

2. Driving energy efficiency in buildings

The EU has on a number of occasions emphasized the importance of Ecodesign and EU Energy Labelling measure to improve energy efficiency in Europe. In the preparatory study it is highlighted that the energy savings potential for windows based on different scenarios are "at best an indication of possible outcome of policy measures". We do not see documentation in the report that there is a clear well assessed link of introducing an EU Energy Labelling and the

expected savings. It is also concluded in the study that the effect "is difficult to quantify, but expected to be positive". The suggested options for EU Energy Labels in the preparatory study try to make a synthesis of contraries across Europe. Most likely, the suggested labels will be promoting more costly and material intensive products than needed in the specific climatic context in a replacement situation. That is not a sustainable development.

The EU Energy Label could furthermore go against national building regulation and existing national energy labelling schemes driving energy efficiency in buildings based on the specific heating and cooling situation. This is e.g. the case in France, as building regulations is concerned about avoiding over-heating and summer discomfort.

The Commission should ensure that consumers have access to adequate information and correct incentives for energy savings, and EuroWindoor favors alternatives to the EU energy label that would fix some key principles at EU level while allowing Member States to adopt a fine-tuned approach taking into account the various climatic conditions across Europe, building properties, variations in national building traditions and regulations etc. This approach is consistent with the way regulations for buildings and building components have been implemented at national level so far (EPBD, e.g. Nearly-Zero Energy Buildings definitions, Energy Performance Certificates for buildings, etc.).

As correctly stated in the final report, the EU energy label "*could give an incentive to Member States to base their building element requirements for windows by referring to a minimum required performance as established in accordance with the labe*l". While EuroWindoor acknowledges that the EU energy label would mainly serve information purposes, our industry is concerned that it could be a first step towards the setting of minimum requirements at EU level. Directly linking an EU energy label to national building regulations would go against the subsidiarity principle whereby Member States can take into account local specificities. Taking this example further it implies that if a MS in Central Europe will implement energy performance of windows based on energy balance, then it is e.g. to be based on climate data from Strasbourg or Helsinki, if the two measures were to correspond to each other.

Recognizing the importance of continuously increasing the energy efficiency of our buildings, EuroWindoor therefore suggests including the concept of a differentiated energy balance approach (U_w, g_w, air permeability and the effect of shutters) to be defined in the specific heating, cooling and climatic context of the Member State when revising the Energy Performance of Buildings Directive (EPBD). Member States are to set the right balance between the factors and to create the best link to other relevant regulated performances of the products. Allowing for flexibility across Europe, this Directive appears indeed to be a more suitable regulatory framework for windows than an EU energy label.

1. Better regulation principle in practice

The Commission is committed to implement the principle of better regulation whereby the EU focuses on measures that are evidence-based, well designed, deliver tangible benefits for citizens and business and take into account the impacts of those measures on the competitiveness of the industry.

The final report of the Preparatory Study concludes that there would be no negative impact on the competitiveness of the industry associated to an EU energy label. Notwithstanding the fact that this assumption is not evidenced, our industry would like to stress that the introduction of the EU energy label could create considerable administrative burden for the sector, especially for Small and Medium Enterprises (SMEs).

The customer today already receives following information for each window:

1. CE marking and unique identification code of the product-type
2. Declaration of Performance (DoP)
3. REACH-Data sheets (if applicable)
4. User manual and safety instructions

Should be supplemented now with:

5. EU Energy Label
6. Technical Fiche
7. Possibly installer Label

As a result, many values are listed multiple times in the various documents. Overall, the number of documents per window is very high.

Given the European Commission's strong political commitment to "better regulation" to ensure that EU measures deliver tangible benefits for citizens, business and the EU, EuroWindoor calls upon the Commission to re-assess the usefulness of an EU Energy Label for windows. Such a label would often not guide the consumers towards the most energy or cost optimal products across Europe and would very likely not deliver the benefits expected from its introduction.

This would be in line with the conclusions of the Exploratory Study process for another energy-related product group: thermal insulation products. It has been concluded that it was impossible to define specific energy performance targets for insulation products due to the high number of climate characteristics, different buildings and different weather conditions in the EU. In addition, the study found that action is possible at building envelope level, which is already covered by the Energy Performance of Buildings Directive (EPBD). Furthermore, CE marking already exists for insulation material and enforces information requirements. Based on the conclusions of the preparatory study for windows we find that all of this can also be said for windows. When on top of this the potential energy savings for windows have not only been downgraded during this process but is linked with huge uncertainty EuroWindoor is convinced that moving forward with implementing an EU energy label for windows will not be neither proportionate nor appropriate.

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About EuroWindoor AISBL – EuroWindoor AISBL was recently founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 12 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 fore front 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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