# NEWSLETTER

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EuroWindoor AISBL · Schuman Business Center · Rue Breydel 40 · 1040 Brussels / Belgium · Tel: +32 -2- 502 3396 · www.eurowindoor.eu

### **EuroWindoor AISBL founded in Brussels**

The representatives of 10 national associations and 1 company decided on March 25th, 2015 to found an international non-profit Association 'EuroWindoor AISBL' with seat in Brussels in order to represent the interests of the European window, door and facade (curtain walling) sector through close dialogue with EU and other relevant institutions. The vision is to be a valued stakeholder for EU institutions when developing legal framework with impact on the European window, door and facade sector. The founding members represent European window, door and facade manufacturers that are in direct contact with consumers, and thereby having large insights on consumers'

demands and expectations. They 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.

The founding members constituted the statute and elected as President Joachim Oberrauch (representing material division PVC) and as Vice Presidents Helle Carlsen Nielsen (representing material division wood) and Franz Hauk (representing the metal division). Frank Koos was appointed as the Secretary General.

The act of constitution of EuroWindoor AISBL was done by the authorised Executive Board at the Notary on April 28<sup>th</sup>, 2015 in Brussels.



The participants of the meeting to prepare the founding of EuroWindoor AISBL on March 25<sup>th</sup>, 2015 in Frankfurt

#### The founding members:

- Træ- og møbelindustrien The Association of Danish Woodworking and Furniture Industries Copenhagen/ Denmark
- VinduesIndustrien, Århus/ Denmark
- RT Confederation of Finnish Construction Industries Helsinki/ Finland
- UFME Union des Fabricants de Menuiseries Extérieures Paris/ France
- VFF Verband Fenster + Fassade, Frankfurt a.M./ Germany
- ANFIT Associazione nazionale per la tutela della Finestra made in Italy, Padova/ Italy
- NBvT Nederlandse Branchevereniging voor de Timmerindustrie Bussum/ Netherlands
- Norsk Trevare Oslo/ Norway
- TMF Swedish Federation of Wood and Furniture Industry Stockholm/ Sweden
- SZFF Schweizerische Zentrale Fenster und Fassaden Dietikon/ Switzerland
- Profine GmbH, Troisdorf/ Germany

#### New members since July 1<sup>st</sup>, 2015:

- VKG Vereniging Kunststof Gevelele-mentenindustrie Nieuwegein/ Netherlands
- Bundesverband Flachglas Troisdorf/ Germany

# **EuroWindoor position on RoHS2 Directive for windows and doors**

EuroWindoor AISBL agreed in the first meeting on July 1<sup>st</sup> in Copenhagen on a position regarding impacts from RoHS2 on windows and doors with electric functions. The directive for 'Restriction of Hazardous Substances' in 'electrical and electronic equipment' was extended to a new category applicable to the sector from 22 July 2019. A study for the analysis of impacts from RoHS2 confirmed the concern of the sector, but concluded in the recommendation that 4 years

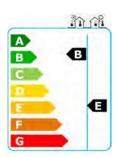
are enough for solving the problems. The conclusion is mainly based on the assumption that substances regulated by RoHS anyhow would disappear from the products due to other legislation. But even if a window or door fulfils the requirements of CPR and REACH, it does not necessarily comply with RoHS. EuroWindoor does not agree to the conclusion. The use of recycling material may exceed the limits. When providing input from big manufacturers for the study difficulties

cient chemical data from even main suppliers. For SME difficulties are expected to be many times higher. EuroWindoor suggests to exclude the window/door itself and limit the scope to the electrical part only similar to the category "Large Scale Fixed Installations". On August 18<sup>th</sup>, 2015 Euro-Windoor presented the position to the European Commission (DG ENV) in Brussels without being able to find the solution now.

became obvious in gathering suffi-



## **EuroWindoor Position on EU Energy Labeling for windows**



Copenhagen EuroWindoor did also agree on a position paper on EU Energy Labeling for windows with arguments and proposals for alternative procedures related to

the results of the Ecodesian preparatory study for Windows.

The attending EuroWindoor members made a clear and unanimous agreement against an EU Energy Labeling for windows. More negative impact than positive is expected. Although there was a negative assessment EuroWindoor AISBL is willing to support energy efficiency and the development for better energy efficient windows by using another way instead of EU Energy Labeling. Such a label will not increase the replacement rate of windows, but that is needed. EuroWindoor members see the recast

of EPBD as the right place to request from Member States stronger requirements (based on energy balance instead of only U-value) for windows in new buildings and for renovation. Key arguments against EU Energy Labeling are based on the following:

- Window products and the purchase situation of windows cannot be compared with white goods and electronic products.
- The energy savings potential depend on the specific climate, building etc. The EU Energy label can potentially misguide, and windows are more than energy performance.
- Will be against building regulations so far, which are based on national climatic conditions, and not determined at EU level.
- Double regulation (CE marking is already at place and include energy related characteristics for windows)
- No documentation of added value for customer (affordability and risk of misguidance)

- No documentation of the cost and administrative burden for industry
- No justification of an EU label compared to national labels or doing nothing.
- Better regulation is questioned.

EuroWindoor met with DG Energy regarding EU Energy Label for windows on July 15<sup>th</sup>. 2015.



From left: Joachim Oberrauch, Britta Tipsmark Hougaard, Franz Hauk and Frank Koos.

DG Energy has to present a proposal soon and if a majority at the consultation forum meeting on 30th September will be against, they will not insist on a EU Energy Labeling.

# Meeting with DG GROW regarding EN 16034

As a result of the good and constructive cooperation over the past years with the European Commission, EuroWindoor was invited to participate in a meeting at DG GROW on May 28th, 2015. The aim of the meeting was to sort out some facts enabling the Commission to take a final decision about the candidate harmonized product standard EN 16034 industrial. "Pedestrian doorsets, commercial, garage doors and openable windows - Product standard, performance characteristics - Fire resisting and/or smoke control characteristics".

Besides EuroWindoor (Britta Hougaard in the absence of Mr. Frank Koos) there were participation of CCMC (Mr Gonçalo Ascensão), Convener of CEN/TC 33/WG 8 (Mr Olaf Heptner), the Belgian association Fedustria (Mr Jan Dietvorst) and from DG GROW, Mr Georgios Katsarakis and Mr Tapani Mikkeli. EuroWindoor was able to provide important arguments. After a vivid discussion, the Commission accepted to cite EN 16034 in the next list in OJEU 10<sup>th</sup> July with start of co-existing period 1st December 2015 and end of coexisting period 1<sup>st</sup> December 2018.

Personalia



executives of EuroWindoor AISBL (from left to right): President Joachim Oberrauch (Member of the board of directors of Finstral AG), Vice Presdents Helle Carlsen Nielsen (Senior Political advisor of Velux A/S) and Franz Hauk (Shareholder of F.R. Hauk Stahl- und Leichtmetallbau GmbH) and the Secretary General Frank Koos (Vice General Manager of Verband Fenster + Fassade).

# Appointments 2015/2016

03/11/2015 EuroWindoor Directing Council Meeting, Brussels/Belgium 15/03/2016 EuroWindoor General Assembly, Nuremberg/Germany 16-19/3/16 fensterbau frontale 2016, Nuremberg/Germany 18-20/5/16 EuroWindoor Timber Study Tour 2016, Finland



#### **Imprint**

EuroWindoor AISBL Schuman Business Center 40, Rue Breydel 1040 Bruxelles / Belgium Phone: +32 (2) 502 3396 www.eurowindoor.eu President Joachim Oberrauch Secretary General Frank Koos

Images: FuroWindoor

