



## **EuroWindowor feedback on revised Criteria for Windows and Curtain Walling in the EU Taxonomy Climate Delegated Act Mitigation, amendment to Section 3.5**

### Issue:

We very much welcome the progress made by considering curtain walls as windows. However, the technical screening criteria for the energy efficiency of transparent building components remain incorrectly defined, as neither climate differentiation nor solar energy gains are considered. The energy efficiency of transparent building components requires an energy balance assessment that accounts for both heat transfer and solar gains related to the respective climatic conditions.

The current pan-European maximum U-value of 1.2 W/(m<sup>2</sup>·K) for windows and transparent curtain walls addresses only thermal insulation and does not allow for geographical and climatic differences to be factored in to optimize resource and energy use. It rather promotes highly insulated and material-intensive windows and curtain walling everywhere in the EU without securing environmental payback.

Solar energy gains are the renewable and free energy captured by the windows that should be maximised during the winter season to reduce the need for artificial heating. Solar energy gains should however be reduced to prevent over-heating during the summer season. Adaptive window solutions allow to do both (e.g. window coupled with shutter, or window with adaptive glazing).

### Solutions:

The EU Taxonomy criteria should be revised to also factor in the 'Energy balance' approach for transparent products like windows and curtain walls by replacing the present pan-European maximum U-value of 1.2 W/(m<sup>2</sup>·K) by values for Heating energy demand and/or Cooling energy demand of windows according to different climatic conditions. For more information about the 'Energy balance approach', see documents referenced below.

### More info:

- Joint call to revise criteria for windows in the EU Taxonomy Climate Delegated Act: <https://www.eurowindowor.eu/wp-content/uploads/2026/04/Joint-call-to-revise-criteria-for-windows-in-the-EU-Taxonomy-Climate-Delegated-Act-2022-10.pdf>
- How to assess the thermal performance of windows (short movie): <https://www.youtube.com/watch?v=Pavq3n0Sxmk>
- Commission Notice: Common general framework for the calculation of the energy performance of buildings (see Annex 12, Chapter 4 "Guidance on transparent building elements"): <https://eur-lex.europa.eu/eli/C/2025/6438>
- DG ENER LOT 32 study (see Task 7, Chapter 4): <https://www.vhk.nl/downloads/Reports/2015/VHK%20511%20Window%20Products%20Lot32%20TASK1-7.ZIP>



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**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 20 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.