



Point of view on energy labelling scheme for windows Discussion Paper (1st Draft)

Introduction

We have been informed about the possible extension of the European Directive 92/75/EEC from 1992 on the labelling of household appliances to other "energy efficiency" products, which are not themselves energy-using, such as windows or other building components.

We assessed the relevance of an energy labelling scheme for windows from the customer's point of view as well as the practical realisation. We are convinced, the commercial drawbacks and administrative burdens outdo the benefits in several respects, not only to the sector but also to the end-user. We also studied the possible impacts and benefits to our industry, and **concluded not to support the inclusion of windows in such a labelling scheme.**

Arguments and facts

The following arguments underline our conclusion:

- The new **Energy Efficiency in Buildings Directive** 2003/1/EEC is calling for a performance based building approach (complete building approach):
 - ⇒ Considers a set of aspects, e.g. orientation, climatic zone, building type, occupant's needs, local building regulation etc., not only U-values, which was the main requirement in the past
 - ⇒ Allows the optimisation of the whole building, by playing with the different aspects
 - ⇒ The overall performance will be declared in a energy certificate of the building
 - ⇒ No need for a ranking in addition to the Energy Efficiency in Buildings Directive
 - ⇒ windows are custom-made products specifically manufactured for the buildings needs and not industrialised products, such as refrigerators, which can be bought in retail markets
- The U-value of a window will still be used for the calculation of the overall building performance, but only as one part of a complex calculation
 - ⇒ No loss of information
- Windows will be **CE Marked soon under the Construction Products Directive**. CE Marking will declare the relevant characteristics of the window, such as:
 - Thermal transmittance (U-Value according European Standard¹)
 - Radiation property (g-value)
 - Air permeability

¹ relevant European Standard: EN ISO 10077 Parts 1 and 2 "Thermal performance of windows"

- ⇒ Performance of the window is made visible to the customer and communicated in a standardised manner through CE Marking
- ⇒ We would understand any energy efficiency labelling of a product, which undoubtedly would be tested again as a construction product for obtaining the CE Marking, as a trade barrier against other design solutions and as an additional administrative burden to the sector with very little benefit to the final user.
- **Two contradicting approaches**, one based on product base and another one based on a holistic building view, would undoubtedly create a trade off and unsatisfactory situations for any involved stakeholder, including the end-user.
- Energy efficiency labelling seems only to skim the surface of some aspects
 - ⇒ The sector supports the holistic building approach on both, energy efficiency and sustainable construction
- The **present labelling scheme** aims at the improvement of energy-using products and consequently has taken up their performance profile and supply chain, which is not adaptable to windows.
 - ⇒ The majority of windows are not sold in catalogues or in large volumes, but custom-made on specific request
 - ⇒ The label will be put on the window after production! There is no comparison possible beforehand
- A window is neither a standalone solution nor an energy-using product, such as a refrigerator. A window is a component, contributing to the energy efficiency of a whole building. Therefore, it is not possible to express this contribution into a simplified formula. Too many aspects must be assessed, depending on the final application, climate, size, legal requirements, occupant's needs etc., which finally lead to a scenario similar to the holistic building approach.
- An **overflow of information** to the end-user, the CE-Marking, the Energy Certificate of the building and the Environmental Product Declaration would be topped by a Window-Labelling
 - ⇒ Unnecessary but a threat, that the end-user would ignore any information