



Position on the draft EC Working Document on a possible Energy Label for Windows

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We would like to welcome the Commission's efforts to develop a legislative proposal on windows and invite the Commission services to build on the feedback given by Member States during the 30th September 2015 Consultation Forum, in order to present a more elaborated proposal in the months to come.

We believe that there is a strong role for the European Union to play in supporting innovation in the windows products' market. To name but a few, a European Energy label for windows would bring the following advantages:

- It would trigger substantial energy savings, estimated 7 Mtoe per year by 2030;
- It would improve the consumer's, retailer's, and installer's understanding of window energy performance;
- It would put an end to the proliferation of labelling schemes, providing an opportunity to easily introduce requirements related to window energy performance, based on energy balance equations in national building regulations.

We also understand the challenges related to setting a label for all windows across Europe, which is simple, precise, and reliable at the same time. Energy related products obviously require the Commission to explore innovative approaches in order to meaningfully tackle their environmental impact.

We would like to express our general support for a consumers' label on windows, but also encourage the Commission to develop a tool guiding installers in a EU-wide harmonised way, utilising the possibilities offered by the digital label. We believe that installers have a key role to play in guiding consumers towards more efficient products. Should this tool be an installers' label, the interaction between consumers' and installers' labels needs to be fully thought through.

Position on the main questions raised in the Draft Working Document:

- We believe that roof window should be included in the scope of the regulation. The replacement of a roof window typically takes place in the context of small-scale works, and the purchase can be done without the support of an installer. This is a situation in which the consumer label would make most sense.
- Should the inclusion of non-residential buildings be considered as too challenging at this stage, we urge the Commission to integrate it in the review clause of the draft regulation. However, determining how residential windows should be distinguished from windows for the non-residential sector needs to be clarified now: windows that can be used for both types of buildings should fall under the labelling requirements to close possible loopholes and facilitate market surveillance.

- We favour separate heating and cooling performances that will better allow consumers to select windows that fit their needs.
- We believe that the performance of the bare window should be complemented with additional information regarding the impact of adaptive glazing and shading devices on the label.
- Taking into account that an increasing share of EU citizens are living in municipal areas, noise protection properties are another important issue to be displayed on the label.

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