

## Template for comments and consortium observations

Date: 17 April

Document: Interim Report Task 1 to 4

1	2	(3)	4	5	(6)	(7)
SH <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of comment <sup>2</sup>	Comment (justification for change) by the Stakeholder	Proposed change by the Stakeholder	Consortium observations on each comment submitted
ECOS	Task 1 Section 6.1 Product Group definition		ge	<p>We question the <b>exclusion of “window systems that are power operated”</b>.</p> <p>Even though a window may contain an electrical opening mechanism, solar panels or switchable glazing (see Task 4, p. 27), its purpose remains the same as all other windows.</p> <p>The justification for excluding power-operated windows is that it represents a small market share. Should this exclusion be kept, the study needs to at least provide a quantified estimation of what that share is and how it will evolve.</p> <p>As buildings move towards “smart buildings”, we expect this share to grow in the near future.</p> <p>See this article on photosensitive windows:  <a href="http://bit.ly/112keSA">http://bit.ly/112keSA</a></p>	Include “window systems that are power operated” in the study scope.	
ECOS	Task 1 Section 6.1 Product Group definition		ge	<p>The study defines windows as:  <i>“building component for closing an opening in a wall or pitched roof that will admit light and may provide ventilation and incorporates at least:</i>                      - frame;                      - transparent filling element, made out of glass;”</p> <p>The explicit <b>reduction of the filling of windows to glass</b> overlooks other possible fillings.</p> <p>Glass is often laminated with polymers and might even be replaced totally. See this example: <a href="http://bit.ly/112ArY8">http://bit.ly/112ArY8</a>.</p> <p>The switchable glazing mentioned in the report might contain layers of liquid crystals dispersed in polymers.</p>	Replace “glass” by “translucent filling” in the product group definition and thereby include windows with non-glass glazing (laminates, polymers, etc) in the scope of the study.	
ECOS	Task 1 Section 6.1 Product Group definition		ge	<p>The study definition of “window” also applies to rooflights. <b>Rooflights</b> have the same function of providing daylight and ventilating the interiors of a building as windows do. More so, this product group represents a considerable potential to reduce heat losses thanks to the latest technological advances.</p>	Include rooflights in the scope of the study.	
ECOS	Task 1		ge	The study definition of “window” also applies to <b>curtain</b>	Include curtain wallings in the scope of the study.	

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2 Type of comment: ge = general te = technical ed = editorial

NOTE Columns 1, 2, 4, 5 are compulsory.

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	Section 6.1 Product Group definition			<b>wallings.</b> Since the market share of curtain walling is growing, the potential energy savings that may be linked to these should not be neglected. We therefore encourage the study team to reconsider this exclusion and define a scope as wide as possible to reap the energy savings reduction of the window product group.		
ECOS	Task 2 4.2 Past and future projection		ge	We believe that more attention should be given to the <b>renovation market</b> in Task 2 and in particular in section 4.2. According to the Renovate Europe Campaign, new buildings are only built at a rate of ~1% a year, whereas 9 out of every 10 of the existing buildings in the EU will still be standing and occupied by 2050. Even if the renovation market is currently modest, we see it as a possible important future trend that should be given more consideration in this part of the study.	Further elaborate on the renovation market as a potential important market trend for decades to come.	
	Task 2 Data sources		ge	As a general comment for Task 2, please note that the data from the German market may give an indication of European trends but that other markets can also have very different aspects, especially when it comes to the products sold in Southern EU countries. We therefore encourage the consultants to look for a <b>broad range of data sources</b> , in order to ensure a comprehensive outlook of the windows market. Further assessment of solar protected glazing would be welcome.	Ensure a solid evidence base upon which the study can build on. Assess further the share of solar protected glazing in the European market.	
ECOS	Task 4 Sections 3.1/3.2/4.2		ge	Substantial information on <b>frames' materials</b> should be added. <u>Plastic frames:</u> Which basic polymers are commonly used? Which stabilisers are common today for the functionalisation of the basic polymers? <u>Wooden frames:</u> Which types of wood are used today (types of trees, sourcing regions, distribution)? Which forestry standard labels are common? - To be	Elaborate further on the window frames materials.	

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				<p>included in Task 1.</p> <p>Which chemical products are used for preservation, impregnation and surface coating (types of mixtures, distribution)?</p> <p><u>Metal frames:</u></p> <p>Which metal compositions (alloys) are used (variances, distribution)?</p> <p>Which surface coatings are commonly used (examples, materials shares?)</p>		
	Task 4 Sections 3.1/3.2/4.2		ge	Information on BAT alternatives to potentially harmful <b>substances</b> used in windows, to minimise impact on the environment or and human health is missing.	Include information on BAT solutions to substitute harmful substances from basic materials (e.g. heavy metal stabilisers for PVC), preservations, impregnations and coatings.	
	Task 4 Sections 3.1/3.2/4.2/ 4.6		ge	Information regarding the <b>durability and repairability</b> of the different window parts (including hardware and gaskets) is missing.	Include information on durability and repairability of the different window parts (including hardware and gaskets) as well as respective BAT in the text, when possible.	
ECOS	Task 4 Section 4.5.3		ge	More information regarding the challenges and boundaries of <b>UPVC recycling</b> should be included in the report.	<p>Analyse further barriers to high-level UPVC recycling (e.g. other polymer parts or the content of old heavy metal based stabilisers).</p> <p>This will help the discussion on the respective design options (supporting high level recycling) at a later stage of the study.</p>	

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