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***Position of the Building Group of the European Aluminium Association on the
CONSULTATION DOCUMENT on the revision of the Energy Labelling Directive
92/75/EEC of 22 September 1992 on the indication by labelling and standard product
information of the consumption of energy and other resources by household
appliances***

The Building Group of the European Aluminium Association speaks on behalf of the leading aluminium building systems companies.

The European Aluminium Association is Associated Member of CEPMC, the Council of European Producers of Materials for Construction.

Please find below our answers to the questions raised in the consultation document, with a focus on windows.

**1. HOW DO YOU SUGGEST THE COMMISSION COULD BEST ENSURE
COHERENT PRODUCT POLICY?**

To ensure a coherent product policy, the Commission should make sure that any new initiative:

- a) is compatible with present and future legal requirements or standards relevant to the product under study;
- b) adds value to them;
- c) is feasible and takes past initiatives into account;
- d) takes energy losses AND ENERGY GAINS into account and can be based on standards harmonised at European level;

Having regard to a), we would like to point out the fact that window producers are presently preparing themselves to CE-marking under the Construction Products Directive (CPD), presently under revision and likely to become a Regulation. The window CE-mark will contain technical values that professional buyers and end-consumers will use to assess the performance of the product.

The window producers are also asked to supply information in the context of the Energy Performance of Buildings Directive (EPBD), which requires an optimization of energy efficiency at building level for new constructions and renovation >1000 m². Soon under revision, it is likely that its scope will be extended to all buildings and all renovations.

Last but not least, the CEN TC350 is working on developing standards to assess the sustainability of construction works and, in particular, European standards for Environmental Product Declarations (EPDs) based on life-cycle assessment. The aluminium industry will soon release a web-based software allowing aluminium window manufacturers to produce EPDs based on the already existing international and French standards...

Having regards to b), and based on the above remarks; the added value of a new energy label for windows is questionable and would easily lead to sub-optimization¹ of the energy efficiency of buildings.

Having regard to c), we must underline that European window labelling rating system has already been investigated (EWERS² under SAVE programme), but could not develop a final proposal due to the huge complexity of the topic and the number of parameters.

Having regard to d) and assuming that window labelling could make sense in some situations, i.e. gaps left open by the EPBD, harmonised standards linked to energy losses are usually existing but standards to assess ENERGY GAINS are either non-existing, under development, or existing but not harmonised across all EU countries. Among others, we can list:

- ISO CD 18292 "Energy performance of fenestration systems – Calculation procedure", presently under development by ISO/TC163/SC2, WG11
- PrEN14500 (Blinds and shutters – Thermal and visual comfort – Test and calculation methods),
- ISO/TC163/SC2/WG9 "Solar properties project"
- ISO/TC163/SC2/ Ad hoc group "Daylight project"
- THS solar factor, in France

Last but not least, the CPD identified the need to address the durability of products (in order to limit the regression of performances with the time), but related standards are not finalized at the moment.

2. DO YOU AGREE TO THE GENERAL PRINCIPLE OF REINFORCING THE USE OF ENERGY LABELLING IN ORDER TO MORE VIGOROUSLY CONTRIBUTE TO THE UNION'S OBJECTIVES ON CLIMATE MITIGATION, COMPETITIVENESS AND SUSTAINABLE PRODUCT POLICY?

Energy labels are very useful for white goods and other products that have the same energy performance all across Europe and that are not part of a bigger system.

We feel that extending labelling to windows is too early for the below-detailed reasons and when it would become feasible, we would recommend limiting window labelling scheme to cases where it really adds value to the EPBD, CPD and CEN TC350 works.

Contrary to washing machines that have the same performance all across Europe, the energy performance of the same window is depending on many external factors:

- Climatic conditions
- Orientation
- Shading device
- User behaviour
- Type of building...

¹ Sub-optimization can occur when the objectives of sub-systems (e.g. windows) are pursued to the detriment of the overall system goals (e.g. whole building).

² Project reports are available for download from http://www.bfrc.org/save/Project_Task_Reports.htm

Once the external factors are fixed, the energy performance still depends on many product performance characteristics:

- Window type
- Window thermal transmittance
- Window solar energy transmittance
- Window visible light transmittance
- Window tightness
- Properties of shading device...

As explained under question 1, standardization work is ongoing on these aspects, but not advanced enough to support a good window energy labelling system at the moment.

3. FOR ENERGY USING PRODUCTS, WOULD YOU FAVOUR THE USE OF AN ENERGY LABEL FOCUSING ON THE ENERGY CONSUMPTION AT USE OR OF AN 'ECO-DESIGN LABEL', (NEAR TO THE ECO-LABEL SHOWING THE 'BEST') GIVING THE GLOBAL ENVIRONMENTAL PERFORMANCE OF THE PRODUCT THROUGHOUT ITS LIFE-CYCLE?

Windows are not energy using products. However, as the same question is often raised for construction materials, we would like to take this opportunity to remind that the CEPMC (Council of European Producers of Materials for Construction) is clearly against Eco-labels for the reasons detailed in the attached position paper.



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Document

4. ARE YOU IN FAVOUR OF ADDING CO2 ON THE ENERGY LABEL? HOW COULD RELIABLE INFORMATION BE ASSURED IN THE LIGHT OF DIFFERENT ENERGY MIXES IN THE 27 MEMBER STATES?

No, it would only confuse consumers and could even be detrimental for the environment, as CO₂ is only one environmental indicator out of a long list of others.

If energy labelling would be judged as not sufficient, Environmental Product Declarations would be the right complement, as they contain the most relevant environmental impact categories.

5. ARE YOU IN FAVOUR OF ADDING ANNUAL RUNNING COSTS ON THE ENERGY LABEL? HOW COULD RELIABLE INFORMATION BE ASSURED IN THE LIGHT OF DIFFERENT ENERGY PRICES IN THE 27 MEMBER STATES?

No, we do not support this idea.

6. WOULD YOU LIKE TO ADD OTHER PRODUCTS TO THE SCOPE OF THE LABELLING DIRECTIVE THAN THOSE COVERED AT PRESENT (HOUSEHOLD APPLIANCES ONLY)? IF YES, WHICH PRODUCTS WOULD YOU SUGGEST (NON-HOUSEHOLD OR NON ENERGY-USING PRODUCTS, 'ENERGY-RELEVANT' PRODUCT, SERVICES SUCH AS HOLIDAY PACKAGES OR OTHER)?

We think that the scope of the Energy Labelling Directive should only be extended to new products when the three following criteria are simultaneously satisfied:

- a) The end-consumer is making purchasing decisions without the assistance of professional experts (e.g. without architect, without contractor etc...);
- b) No or not sufficient legal requirements or standards related to energy efficiency do exist for the sector the product belongs to (i.e. if gaps remain after revision of the EPBD, CPD, and the development of standards under CEN TC350);
- c) Where the number of parameters relevant to make an acceptable energy efficiency assessment is not so high that complexity would kill the labelling scheme.

7. IN VIEW OF DYNAMIC LABELLING, WHICH APPROACH WOULD YOU SUGGEST FOR THE TRANSITION FROM AN EXISTING LABELLING SCHEME TO A NEW LABELLING CLASSIFICATION IN ORDER TO CAUSE MINIMUM DISTORTIONS?

No opinion.

8. DO YOU WANT TO PROPOSE AN ALTERNATIVE ROUTE BEYOND THE CONSIDERATIONS IN THIS DOCUMENT?

In our opinion, what would be the most valuable initiative to improve the energy performance of buildings today would be to stimulate the renovation of existing building stock through appropriate incentives.

We thank the Commission Services in advance for considering our inputs.
We would be happy to supply any further information you may require.

Truly yours,



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