



Position Paper

20th of December 2012

The European Aluminium Association (EAA) expresses its scepticism about the relevance of Ecodesign measures for windows. In case Energy Labelling measures would be decided, the EAA underlines the importance of accurate window energy balance calculations based on location, climatic conditions, orientation and building type.

On the 7th of December 2012, the European Commission finalised its Ecodesign Working Plan for 2012-2014. Window products were included in the indicative list of priority product groups to be considered for the adoption of implementing measures, following a preparatory study that will recommend the best policy mix to be deployed, i.e. ecodesign and/or labelling and/or self-regulation measures.

The European Aluminium Association expresses its scepticism about the relevance of Ecodesign measures for windows for the following reasons:

Firstly, adding such measures would not fulfil the basic conditions set by the Ecodesign Directive itself, which states that Ecodesign measures can only be developed in "absence of other relevant Community legislation or failure of market forces to address the issue properly".

Windows being already submitted to a complex sector-specific legislation, including the Construction Products Regulation and the Energy Performance of Buildings Directive, through which energy and environmental issues can be addressed, they should not have been included in the "priority list".

Because they are covered by the same sector-specific legislation, windows should have been treated equally with thermal insulation products for buildings and be part of the "conditional list" where launching a preparatory study is dependent on the outcome of on-going regulatory processes and/or reviews.

Also, EAA would like to remind that, like insulation products, windows are intermediate products and form a part of complete buildings. A holistic approach towards buildings is more beneficial in terms of energy and environmental savings than a component-by-component approach.

EAA calls for a clarification of the different roles and areas of application, possible synergies or overlaps, of the different EU instruments that aim to reduce energy consumption and enhance environmental protection, as also recommended in the recent Evaluation¹ of the Eco-Design Directive.

In case Energy Labelling measures would be decided for windows, their scope should be limited to the cases where a holistic optimization of the whole building does not occur. The European Aluminium Association further recommends an energy rating system were installer's labels would be given a higher importance than standard energy labels as we know them today.

¹ http://cses.co.uk/ecodesign_evaluation

We need to remind that a true comparison of products only happens for standard windows sold in Do-It-Yourself outlets which represent less than 10% of window sales in the EU. In more than 90% of cases, windows will be made to measure and consumers will make their choice based on quotations received for their specific case. An accurate energy calculation (e.g. leading to precise energy rating) could be done and would be preferable to a label calculated based on standard window size, standard building, standard orientations and standard climate. An accurate energy calculation corresponding to the specific case of the consumer (precise energy rating) should be attached to quotations to allow him to choose the best products for its specific case (location, orientations, building type etc...). It should be underlined that a too simplified window energy labelling scheme not differentiated per climatic conditions and orientations, could lead towards uniform products across the EU that would not correspond to local needs, would not be the most cost efficient for consumers and would not be the most sustainable.

About the European Aluminium Association:

The European Aluminium Association, founded in 1981, represents the European aluminium industry from alumina and primary production to semi-finished and end-use products, through to recycling. The European aluminium industry directly employs about 255,000 people.

The Building Group of the European Aluminium Association is specialized on aluminium fenestration systems and flat aluminium products for cladding and roofing.

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