

FAECF Position

- **Get Europe renovating!**

- We see the urgent need for domestic energy efficiency and the currently low renovation rates of homes across Europe to be addressed – but we question whether the generic European window energy label as proposed is the answer.
- Financial incentives such as reductions in VAT could provide a much greater incentive for homeowners to renovate their property and should also be part of an integrated whole-house approach, Member State by Member State.
- Windows are typically fabricated and installed within the same Member State, which means that there is insufficient cross-border trade to justify this European-wide action.
- We welcome that the Preparatory Study has clearly demonstrated that the energy balance for windows should be properly reflected in national building regulations, particularly when currently in some Member States consideration is given to U-value in isolation.

- **Where to start?**

- The questions put before the Consultation Forum on 30 September 2015 were largely framed on the basis that the generic energy label featured was the right approach to adopt. It was clear from the Forum meeting discussions that more work is needed to first test this assumption and the market impact in all Member States.
- New building work in all market sectors and renovation work in the non-residential sector are already covered by existing EU and national legislation dealing with energy efficiency. For new buildings and major renovations, the Energy Performance of Buildings Directive (EPBD) requires a holistic optimisation of the complete building, including the windows.
- As a result, any measure here should focus on domestic refurbishment projects that are not considered to be in the scope of the EPBD and where a whole-house approach might not occur.

- **Where next?**

- We are against the Commission's proposal for the generic window energy label across Europe.
- The EPBD should be developed in each Member State to reflect the local conditions, including the climate and building styles, allowing for more personalised advice that takes into account the many factors that need to be considered when replacing windows, such as daylighting, overheating, ventilation, security and amenity.

- Priority should be given to the views of our section of the industry in particular, representing manufacturers and installers, as we interact with the end customers on a daily basis and ultimately are responsible for installing the completed products.
- Thousands of manufacturers are producing made-to-measure windows across Europe every day, which is very different compared with the supply chain for white goods, for example, and the implementation of any labelling scheme should recognise this. The responsibility and cost of preparing the label ultimately will be the window manufacturer's.

FAECF Principles

- **Cost-optimal**

- The impact of windows on energy usage depends on many factors and is a very different consideration from that for the energy usage of white goods, where a generic or average approach may be appropriate and the energy label in the context of white goods is generally understood.
- A generic energy label for a window, based on the smaller size from the window product standard and average climate and orientation conditions that would be used for B2C marketing could mislead the consumer, who needs to know that energy use actually depends on the actual installation, including the size, specific orientation and the local climate, as well as taking into account seasonal affects.
- This is especially the case for products such as door-height windows, where performance cannot be properly assessed using the small window sample size from the product standard of 1.23m x 1.48m.
- The proposed EU-wide generic energy label for windows is not suitable for product specification and it will result in unintended consequences, including the over-specification of windows due to the bandings proposed. This could result in a loss of consumer trust and increased confusion in the market. One generic A to G rating scheme does not fit all.

- **Consumers**

- As approximately 90% of windows in Europe are made-to-measure, the customer journey is very different compared to that for white goods. Typically, the domestic customer will first contact a local, professional installer, of which there are many thousands across Europe
- As stated, we are against the proposal for the generic window energy label across Europe. If a European energy label should be implemented, an installer label, tailored to the consumer's specific situation and requirements will, compared to a generic label, improve the payback and avoid the purchase of superfluous components when consumers are replacing windows.
- An installer label, by improving the specification and payback for windows, will increase consumer trust and as a result increase and re-energise residential renovation rates.
- Allowing for greater consumer choice is an important driver for house renovation and Europe benefits from a wide diversity of window products to suit the different climates, construction styles, cultures and consumer tastes. This diversity should also be encouraged by allowing each Member State to decide on the best approach to promote renovation, recognising that renovation is driven by more than consideration of energy efficiency alone.

- **Compliance**

- An installer label that takes into account relevant site-specific conditions in each Member State, including the exact size, orientation and climate, will allow for the installer to provide more personalised advice to the consumer and to better optimise the window selection in the domestic refurbishment market, and in the absence of any holistic approach.
- The development of a user-friendly web-based tool for the installer label is a critical requirement, given the important role of the installer in the supply chain. This will help the installer to demonstrate in a transparent manner to the consumer that their advice is customised to their specific circumstances and requirements, based on the calculation of the energy balance
- The tool should be developed such that it also minimises the administrative burden on the installer, integrating with the requirements of the Construction Products Regulation (CPR) and CE marking in particular, so that where possible the information contained in the Declaration of Performance could be used as the basis for specification in refurbishment projects
- Such a tool should also assist the market surveillance authorities with their work, as well as provide supporting data to assess the impact of the measure.