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EuroWindoor position on stakeholder consultation for the second set of Green Public Procurement (GPP) criteria - Product Sheet - Windows, Glazed Doors and Skylights

EuroWindoor is an umbrella organization of the European associations of fenestration and door sector FAECF, FEMIB, EPW and UEMV for the three frame materials metal, wood and plastic and the infill material glass. On a European scale EuroWindoor represents more than 50.000 companies and more than one million employees. The European window industry is mostly an industry which consists of small and medium sized companies, with local employees. In view of the construction supply chain, the window industry supplies local construction companies with building components and is thereby a part of a local supply chain with local employment.

The fenestration industry feels responsible for giving good answers and good solutions to the different urgent questions that our European community is confronted with, such as safety, health, energy and of course environment. Therefore EuroWindoor and its member organisations take the opportunity to react from this responsibility and are willing to contribute and cooperate to find good and sustainable solutions to the matter.

EuroWindoor support green procurement initiatives to improve the sustainability of public sourced buildings as its members are directly affected by such measures.

In our position on 28 August 2008 we outlined a number of detailed concerns to the first consultation on GPP Product Sheet - Windows, Glazed Doors and Skylights (Ver. 1.1). We learned from Louise Evans, AEA End of April that to our comments mainly “no changes were proposed” and only some “additional text” was added. Therefore our concerns are not solved and we stay nearly to the same comments. We have to reject the revised GPP Product Sheet - Windows, Glazed Doors and Skylights, because it is

- based on inappropriate data and assumptions,
- does not take care of all different conditions and situations in Europe,
- does not consider available GPP solutions from member states,
- is too simple for setting environmental product requirements,
- overemphasizing the need of Ecolabels ignoring legal requirements for verification
- introducing new barriers to trade by forcing national labels and
- leading to a suboptimal even wrong improvement for GPP.

EPW: European Plastic Window Association
 FAECF: Federation of European Window and Curtain Wall Manufacturers' Association
 FEMIB: Federation of the European Building Joinery Associations
 UEMV: European Glaziers Association

We feel confident that it is better to have no GPP Product Sheet for Windows instead such a bad one and would highly appreciate to get the possibility for a meeting to discuss the arguments to give the EC the opportunity to verify the conclusion of AEA and to modify the draft in an appropriate way.

Our detailed concerns are summarized as follows:

- Data and examples used in this Window Product Sheet from North American and other non-European sources are inappropriate, because the markets and the products are not comparable.
- Technical specifications that are already covered by the European Performance of Buildings Directive and the activities of CEN/TC 350 are to be used.
- Energy efficiency of windows cannot be restricted to U value alone. All relevant criteria must be taken into account, even sun shading with regard to southern Europe (not mentioned at all).
- A single value for whole Europe cannot be correct, because the climatic conditions are too different and therefore different requirements must occur.
- Verification of product related characteristics and compliance with regulatory requirements is demonstrated through the CE marking system and not by eco-labels.
- National eco-labels do not guarantee to fulfil the GPP request. They cannot fulfil more requirements than these defined from the program operator. To believe in the thesis that "Products holding a relevant Type 1 Ecolabel or that demonstrate compliance with relevant Type 1 Ecolabel criteria will be deemed to comply." is naive.
- Reference to national eco-labels has to be deleted, because it builds up barriers to trade. Moreover the eco-label and criteria list at 5.2 is weighted towards non-European sources giving the wrong impression of European products which are some of the most environmentally friendly yet produced.
- The expected 'average' lifetime figures are completely wrong for European products. We would expect IGUs to have a service life of 20 years or more. Windows have a service life which is at least the double of the IGU. ISO 15686 gives methods for assessing service life and the data and experience held in many Member States is far more relevant than any American studies. Life expectancy is not a question of materials, it is a question of appropriate maintenance.
- We would be happy, if we have such typical replacement periods. The marked would increase four times immediately. But in fact more than 1.000 Million windows need to be renovated. This is mentioned by the TNO study which is referenced with footnote 13 in the background report and footnote 18 in the product sheet.

We would be grateful if you would take note of our concerns which we would be happy to discuss further at the appropriate time.

Yours sincerely

EuroWindow
The Chairman



Kurt Emil Eriksen