



EuroWindowdoor - 4, Rue Jaques De Lalaing - 1040 Bruxelles / Belgium

European Commission
 DG Environment - G2
 Mrs. Jill Michielssen
 1049 Brussels / Belgium

By email: Jill.Michielssen@ec.europa.eu
 CC: James Cadman, AEAT (James.Cadman@aeat.co.uk)

The General Secretariat
 c/o UEAPME
 4, Rue Jaques De Lalaing
 1040 Bruxelles / Belgium
 Phone: (+32) 2 502 3396
 Email: eurowindowdoor-gs@eurowindowdoor.org
 Internet: www.eurowindowdoor.org

Direct access
 Walter-Kolb-Str. 1-7
 60594 Frankfurt am Main / Germany
 Phone: (+49) 69 95 50 54-0
 Fax: (+49) 69 95 50 54-11

Frankfurt, 28/10/08

EuroWindowdoors position on the Green Public Procurement Product Sheet - Windows, Glazed Doors and Skylights (Ver. 1.1)

EuroWindowdoor 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 EuroWindowdoor 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 EuroWindowdoor 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.

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

However we are very concerned that much of the data and examples used in this Window Product Sheet were taken from North American and other non-European sources. Moreover we are concerned that such a document may contain technical specifications that are already covered by the European Performance of Buildings Directive and the activities of CEN/TC 350.

We have a number of detailed concerns that are outlined below:

1. Criterion for energy efficiency of windows. The GPP restricts this to U value alone whereas solar gains, daylight transmission, air penetration and ventilation are all relevant criteria when considering the selection of fenestration products.
2. Verification of product related characteristics. Compliance with regulatory requirements is demonstrated through the CE marking system. For construction products Directive 89/106/EEC applies and for windows and doors the harmonized technical specification is

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

EN 14351-1. U-value and air tightness class are part of the information accompanying the CE marking symbol.

3. Demonstration of compliance using the Nordic Swan scheme is not relevant for European products as it only uses for example U value targets applicable to Scandinavian climatic conditions. The Nordic Swan label has no relevance for windows at all and is already not accepted by the big majority of Scandinavian manufacturers. Therefore reference to it has to be deleted. 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.
4. 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.
5. The ISO standards allow either recycled content or recyclability to be used in LCA calculations. By restricting the GPP to the former denies metals and to a lesser extent other framing materials an equal opportunity to benefit from the products' physical properties.
6. The cost considerations for triple glazed windows are not up to date. The additional cost of between 20-40% more is for the glazing itself and not for the window. As glass is only a part of the window the total additional cost for triple glazed windows is less than 20-40%. Not only Scandinavian countries have energy saving regulations which require triple glazing, also countries with moderate climates like Germany and Austria are preparing tighter rules which will make triple glazed windows as a standard product in the near future. Whether this is economic depends highly on the climatic situation and the consideration of all the characteristics mentioned in comment No 1.

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



Franz Hauk