



GLASS FOR EUROPE

Europe's Manufacturers of Building, Automotive and Transport Glass

Glass for Europe's vision on the path 'Towards a new Energy Strategy for Europe 2011-2020'

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Glass for Europe is a registered organization on the European Commission's register of interest representatives under the ID number 15997912445-80.

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Glass for Europe is the trade association for Europe's manufacturers of building, automotive, and transport glass, all derived from the basic material known as flat glass. Flat glass is the material that goes into end-products that we see (and see through) every day. It is used to make windscreens and windows for automobile and transports, and windows and façades for houses and buildings. It is also used for many other applications like solar energy equipment, interior fittings and decoration, furniture, "street furniture" like bus stops for example, appliances and electronics, and others.

Glass for Europe has four members – **AGC Glass Europe**, **NSG-Pilkington**, **Saint-Gobain Glass** and **Sisecam-Trakya Cam** – and works in association with the company **Guardian**. Altogether, these five companies represent more than 90% of Europe's flat glass production.

Glass for Europe firmly believes that state-of-the-art glass can play a vital role in achieving the EU's energy saving targets and promotes ambitious policy mechanisms to support the market uptake of energy-efficient glass technologies.



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Introduction

In the context of the environmental and economic challenges Europe is currently facing, it is increasingly obvious that Europe needs a **dynamic and ambitious new energy strategy**. This is essential in order to reduce Europe's dependence on foreign energy imports whilst encouraging the transition toward clean and efficient energy generation and a more rational use of energy which are needed to achieve the EU's target of a 20% reduction in greenhouse emissions by 2020.

Europe's energy policy framework for the coming decade will have an important impact on all sectors of the economy and on society as a whole and this stock taking exercise offers an excellent opportunity to **reassess priorities and to refocus policy** in the most effective way. For this reason, Glass for Europe welcomes the opportunity to present our views on the future energy strategy for Europe.

Key Messages

- Welcome the recognition that **energy savings potential continues to be greatly underutilised**
- Urge the Commission to call for a reassessment of policy priorities as part of Europe's Energy Strategy 2011-2020, with **energy efficiency put at the top of the agenda**
- Call for the **20% energy saving target by 2020 to be made binding** and for concrete commitments to be put in place at the national level for example by way of national targets on the number of buildings to be refurbished.
- Welcome the Commission's commitment to put in place **additional measures to encourage energy efficiency in buildings**
- Urge the Commission to put in place an **energy labelling scheme for windows** as a priority and to do more to **raise awareness of energy efficiency solutions**

Efficiency at the heart of Europe's energy strategy

Glass for Europe welcomes the recognition within the text that **energy savings potential continues to be greatly underutilised** in Europe. We are concerned that the political rhetoric on the importance of energy saving has far outstripped actual commitments and progress to date has been disappointing. This is despite the considerable potential that policies in this area can offer in terms of achieving Europe's environmental, economic and energy objectives.

In many ways energy efficiency policy can be seen as a **silver bullet in addressing many of the challenges which Europe faces** today and going forward this should be one of the key pillars of Europe's future strategy. As referred to in the document, ambitious policies in this area can not only reduce the need to import energy, they can also help to ease Europe's reliance on carbon emitting fossil fuels. Moreover, energy efficiency helps to insulate the economy against fluctuating energy costs at low when not at negative cost in terms of investment needed versus savings gained.



The stock taking document also recognises the key role of energy efficiency in making the economy more competitive, creating jobs, promoting local business opportunities (especially for SMEs), and lowering people's energy bills. In light of this we feel that a **stronger commitment to improving energy efficiency should be at the heart of the Energy Strategy** for 2011-2020.

Benefits of an ambitious energy efficiency policy

Improving energy security

At present, Europe imports 50% of its energy, and forecasts indicate that this figure will rise up to 70% by 2020. This leaves the EU dependent on supplier countries with whom relations are sometimes volatile. Given that **the most secure energy is energy saved**, policies which help to reduce energy consumption can help to ease Europe's dependence on such volatile supplier relationships and thus ensure a more secure energy future.

Meeting Europe's Environmental Goals

In order to meet Europe's emission reduction targets and particularly with a view to moving towards a more ambitious climate policy, the carbon cost of energy will become increasingly important. **Improving energy efficiency offers a low cost solution to reducing CO₂ emissions**, and this should be recognised within the Commission's future Energy Strategy. It is essential and complementary to the development of the renewables sector for the decarbonisation of Europe over the long term.

Boosting EU Competitiveness

The 2010 motto for Europe is 'building an eco-efficient economy' and promoting green growth is increasingly becoming a priority. Encouraging the development and uptake of new green technologies such as efficient glazing solutions can play a key role in helping European industry to strengthen its competitiveness while meeting the climate challenge and generating more green jobs.

Addressing Energy Poverty

EU citizens with the lowest incomes are also the most vulnerable to increasing energy prices due to the poor energy performance of social housing. **Refurbishing existing buildings to meet the highest performance standards** can help to address this imbalance. Many of the technologies available, including energy efficient glazing, can be relatively low cost and simple to implement while delivering important savings on the household energy bill. In turn, energy efficiency contributes to the higher purchasing powers of citizens in need.

An Ambitious Framework

The Commission has recognised that there is considerable room for improvement in the national and EU Action Plans on energy efficiency and there is a need to step up the level



of ambition in this area. Key to this will be a robust approach to the **forthcoming Energy Efficiency Action Plan**.

Given the lack of progress under the current voluntary framework, Glass for Europe believes there is a **need to put in place binding targets** as part of the new Action Plan in order to achieve the goals of a 20% energy saving by 2020. The new Action Plan should also be sufficiently ambitious to reflect the key role of the energy efficiency industries in reaching Europe's climate targets.

At national level, Member States should also be encouraged to put in place binding targets and to commit to go further in energy efficiency in the next round of national action plans. **Specific targets could be set in the building sector** such as targets on the number of buildings to be refurbished or targets on Giga Joules to be saved annually in the building sector.

A focus on Europe's Buildings

It is a well known fact that over **40% of energy consumption is used in Europe's buildings** and the building sector thus offers considerable energy saving and CO₂ reduction potential. The revised Energy Performance of Buildings Directive (EPBD) provides a good framework to make important energy savings in the building sector. However, in the past, legislation in this area has been poorly implemented thus wasting the opportunity to make important energy savings. Glass for Europe therefore agrees with the Commission's assessment that **better implementation and enforcement will be key to achieving real results**. This must also go hand in hand with an ambitious application of the legislation at Member State level.

We welcome the Commission's recognition that the EPBD will need to be accompanied by other measures **in order to fully realise the important energy saving potential of Europe's buildings**. There are a wide range of measures that should be taken into account, ranging from simple things such as raising awareness of energy saving measures and technologies, promoting a faster uptake of energy efficient technologies and innovation and putting in place financial and other incentives.

For new buildings, insulation and efficiency standards are improving, but they still fall well behind best practice. The **2020 target for ensuring that all new buildings are nearly zero energy, can be a real driver of efficiency improvements** and it is important that this commitment is taken seriously.

The real challenge however, lies with existing buildings, which make up the overwhelming majority of all buildings in Europe and which are often highly inefficient. This is particularly true when one considers that new constructions account annually for only 1.4% of Europe's building stock and that a substantial share of Europe's buildings are still single-glazed only¹. **Encouraging energy efficiency upgrades in existing buildings can deliver huge savings** in terms of energy consumption and the EU needs to look more closely at the policies and incentives that can be put in place to increase the rate of refurbishment. For example, independent studies² show that **savings of**

¹ TNO is currently undertaking a study on glazing type distribution in the building stock across the EU. According to partial preliminary findings, in a country like Belgium 35% of buildings are still single-glazed.

² TNO Report 2008-DR1240/B by TNO Built Environment and Geosciences, Delft, The Netherlands.



more than 100mn tonnes of CO₂ could be achieved annually if all Europe's buildings were fitted with advanced energy saving glazing.

Information and Incentives

More needs to be done at EU level to **raise awareness** about the simple and low cost solutions available to citizens and to businesses to improve the energy performance of their buildings. For example, for a relatively small incremental cost, high performance double-glazing can significantly reduce the amount of heat lost via the window while allowing free solar gain and this leads to considerable savings in the energy needed to heat the building. The **return on investment for such products in terms of energy saved is considerable** and the use of such cost-effective energy efficient materials and components should be encouraged.

Trends show that consumer empowerment and information brings about market change. An **EU energy labelling scheme for windows** will send a clear signal for consumers and encourage them to use the most efficient products and should thus be introduced as a priority. In addition, **fiscal incentives** – such as low-interest loans to incentivise renovations – will certainly contribute to the uptake of energy efficient technology and products. Despite the reticence of some Member States to build new low emission buildings, the general public is far more inclined towards energy-efficient buildings, but more needs to be done to effectively change consumer behaviour.

Challenges ahead

To ensure that real progress is made in the coming years, the EU and national policy makers need to **prioritise energy efficiency** within the overall EU Energy Strategy and commit to concrete actions to **promote the uptake of energy saving technologies**, including energy efficient glazing products. These actions should include:

- An ambitious approach to the revision of the EU's **Energy Efficiency Action Plan**, with a focus on buildings.
- Proper implementation of the recast **Energy Performance of Buildings Directive**, including ambitious national standards
- Introduction of an **energy labelling scheme for windows** to provide a signal for consumers and encourage the uptake of the most efficient products and to create a vehicle on which governments can base incentive schemes.
- **Encouraging and require the use of energy efficient glazing** for new construction and for the retrofitting of existing buildings. Public authorities should act as a role model with regards to public buildings and social housing.
- **Economic and fiscal incentives** to promote better uptake of energy efficient glass and create growth and jobs as part of the European Economic Recovery Plan.
- **Information and communication campaigns** to raise citizens' awareness on the benefits of energy saving solutions.
