GLASS FOR EUROPE
Europe's Manufacturers of Building, Automotive and Transport Glass

Glass for Europe Position Paper on the Recasting of the EU Energy Performance of Buildings Directive

Introduction

Glass for Europe welcomes the Recast of the Energy Performance of Buildings Directive and its ambitious attempt to cut the energy use of Europe's buildings. Glass for Europe has long argued that a greater level of ambition is required in order to increase the level of energy efficiency in buildings, which are Europe's biggest users of energy. It is vital that the EU puts in place legislation that is fit for purpose to meet the energy challenges of the coming years.

The EU's Directive on the Energy Performance of Buildings (EPBD) (2002/91/EC) is the most important legislative instrument of recent years for improving the energy efficiency of Europe's buildings. However a major weakness is the limitation of some of its provisions to buildings over 1000m². Glass for Europe welcomes its proposed removal under the Recast and considers it highly important that it remains excluded.

The implementation of the current Directive EPBD at national level has been slow and insufficient, meaning that only a fraction of its potential is being achieved. The effective implementation of the EPBD is as crucial to improving the energy efficiency of Europe's building stock. Taken with other recently announced energy-efficiency measures, the proposed Recast can make progress towards making Europe's buildings more energy efficient.

1. Removal of 1000m² thresholds

- Glass for Europe welcomes the removal of the 1000m² threshold. Recent studies from Ecofys[1] have shown that an extra 45 million tonnes of CO2 per annum can be saved if the threshold were removed. Glass for Europe calls upon the European Parliament to support this approach, recalling that MEPs voted by 592 to 26 to eliminate the entire concept of a threshold restriction altogether[2].

2. Promote "very low energy buildings" national targets

- It is vital that the EU increases the numbers of buildings in which both carbon dioxide emissions and primary energy consumption are low or equal zero. Glass for Europe welcomes the requirement in the Recast for Member States to publish national action plans to increase their uptake, but isconcerned that the targets proposed will not be ambitious. Therefore we feel that the Directive should require that all new buildings be low energy or zero energy by 2020.

[1] Mitigation of CO2 emissions from building stock (2004) and Cost-effective climate change protection in the building stock of the new EU member states (2005) www.ecofys.com

[2] European Parliament Resolution of 31 January 2008 on an Action Plan for Energy Efficiency: Realising the Potential P6_TA(2008)0033

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3. Promote Energy Performance Certificates

- Energy Performance Certificates (EPCs) offer an important indication of a building's performance. Glass for Europe welcomes the recognition of their importance and elevated status in the Recast. The certificates should be made mandatory in all buildings to which the public has access, regardless of size. This measure is easy to implement, cost effective and would raise awareness amongst EU citizens and organisations concerning the importance of improving buildings' energy performance. In addition, Glass for Europe calls for the harmonisation of EPCs for non-residential buildings within and across EU Member States, facilitating their comparison in all other Member States and improving the development of the European Single Market.

4. Promote best energy efficient components

- The Recast of the EPBD requires Member States to set minimum energy performance requirements in respect of heating, cooling and air-conditioning systems. The Recast in its current form does not make any requirements with regard to energy efficient components. The EPBD Recast should maximise the energy saving potential of buildings and ensure that the best-performing components and highest-rated products, as well as passive systems to heat and cool buildings such as solar control glass[3] and low-e double glazing[4], are chosen as replacement or refurbishment solutions wherever possible. The failure to include this aspect of building legislation is a weakness of the Recast. It is hoped that the Commission will not ignore the energy-saving potential of high-performance products during the forthcoming Recast of the Energy Labelling Directive (91/565/EEC) and the strengthening of the Construction Products Regulation (89/106/EEC).

5. Promote financial incentives for energy saving

- Under Article 18 of the proposed Recast the Commission is to make proposals for "general incentives" for energy efficiency measures in buildings. Glass for Europe insists that the Commission ensures that Member States offer fiscal incentives, to implement improvements which should be linked to those recommended by the Energy Performance Certificate (EPC). Member States should also be given the ability to reduce the rate of VAT on all energy saving goods and services. It is a welcome step that no further incentives shall be provided for buildings which do not meet minimum energy performance requirements from 2014.

6. Promote coherent inspection and enforcement mechanisms

- Glass for Europe welcomes the inclusion of regular inspections for both heating and air-conditioning systems by independent experts. Glass for Europe urges that there also be provisions made for the harmonisation of EU training programmes for installations accreditation inspectors and EPC delivery inspectors should be developed across Europe. This would allow the establishment of a coherent framework of experts who could operate across national boundaries without restraint of trade. Finally, inspections of heating and cooling installations should cover the entire system, not just certain components of a system.

[3] Solar control glass reduces solar heating of air-conditioned buildings by sending the sun's heat back out and away from the building instead of letting it through. By significantly reducing the load on air-conditioning systems, it saves large amounts of energy.

[4] Thermally insulating glass for windows and façades, also known as "low-E" (for low-emissivity) glass, usually forms the inner pane of an insulating glass unit. A transparent metallic coating reflects heat back into the room. At the same time, low-E allows solar heat to pass into a building and warm the interior (this is known as "passive solar heat gain").

Conclusion

The published Recast proposes some changes which would, if implemented, allow for the EU to make real progress in significantly reducing energy use across Europe. The Recast of the EPBD is, and remains, a unique opportunity for EU policy makers to implement far-reaching actions that could benefit all EU citizens and help the EU achieve its goals to improve energy efficiency by 20% by 2020.

About Glass for Europe

Glass for Europe is the trade association for Europe's manufacturers of building, automotive, and transport glass, all derived from the base material known as flat glass. Flat glass is the basic material that goes into end-products that we see (and see through) every day: It is used to make windscreens and windows for automobiles and transport, and windows and façades for houses and buildings. It is also used, in much smaller quantities, for many other applications like interior fittings and decoration, furniture, "street furniture" (like bus stops for example), appliances and electronics, solar energy equipment, and others. Glass for Europe has currently three members (AGC, Pilkington and Saint-Gobain Glass). In total, these companies employ over 16, 000 people across the EU and have an annual production capacity of around 11.500.000 tonnes of float glass.

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