

EWFA Comments on the Development of the Ecolabel Criteria for Office Buildings

The European Window Film Association welcomes the European Commission initiative to extend the ecolabel scheme to buildings. Optimising the energy performance and sustainability of buildings constitutes a major opportunity for Europe to meet its energy savings targets.

EWFA company members are specialized in the production of glazing enhancement solutions for building and automotive applications. These enhancements play a substantial role in improving the energy efficiency especially of retrofit buildings, but of new constructions as well.

Glazing technologies such as window film help to improve the thermal insulation values of glazing, thereby reducing the need for both heating and cooling. By controlling the amount of daylight and solar energy that enters the building, window film provides a better balance of workplace temperatures, therefore enhancing the well-being of building occupants.

EWFA would like to make specific comments to the two documents presented and discussed in the 2nd AHWG Meeting on Office Building of November 2011 in Brussels.

- **Technical background study in support of the development of the EU Ecolabel and GPP criteria for office buildings**

Lighting Control Strategies and Human Behavior

In the executive summary of the report, the consultants draw conclusions on the impact of lighting:

*“Among the energy consumption shares, **lighting causes the highest environmental impacts, in particular, when no lighting control strategies are implemented.** Any lighting control systems will considerably reduce the energy consumption of office buildings and, consequently, to improve its overall environmental performance.”*

In addition to the assessment of the contribution of lighting to the overall energy consumption of a building and the need to tackle this issue, EWFA would like to point out the need to include the human behavior factor in these assessments. We believe that this study has not taken into account human behavior and how it impacts the energy consumption of buildings. Leaving the lights on and not changing the position of blinds are examples of this. The most common lighting control technologies and mechanisms available in the market are adjustable, but the reality is that hardly anyone adjusts these throughout the day. As a result lights are kept on during the day even when it is not needed which overall impacts the energy consumption of a building. For this reason we would like to see that the study includes the human factor in its assessment. This is an important factor for our industry since window film is one of the lighting control technologies available in market that allows the proper function of the window without manual management or involvement.

Cooling More Important Than Heating: Importance of G-Factor

EWFA shares the study's view that cooling is more important than heating in terms of energy consumption impact. However, we see this approach is not reflected in the report since the main emphasis is on U-value, although it is actually the G-value that impacts on cooling?

EWFA invites therefore the JRC to include the G-value assessment of glazing which would bring more precise information about the effects of the solar energy transmitted via windows.

- **Draft Commission Decision on establishing the ecological criteria for the award of the EU Ecolabel for office buildings**

Adjustable Shading Mechanisms

Criteria 11 - Visual Comfort

Item 11.3 Glare Prevention in Daylight

*“Workplace shall be provided in absence of glaring from daylight. Windows shall be equipped with a sufficiently **adjustable shading mechanism** which allows the intensity of the daylight reaching the workstation with display to be reduced.”*

As pointed out in the minutes of the second stakeholders meeting of November 2011 in Brussels the current wording of this criteria constitutes a serious limitation to the



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glare products and technologies that can be used and which are not always adjustable.

EWFA requests the Joint Research Center to remove the word adjustable and replace mechanism by technologies. Window film is a valuable and widely used glare reducing technology which is not adjustable, so the current wording is excluding window film of the options.

Windows are a very important part of a building since they serve for light, ventilation and decoration. The market nowadays provides many solutions to tackle problems resulting from the use of windows like excessive glare and sun entering the building. Window film is one of these product solutions. By using this technology, the cooling loads demanded by air conditioned buildings can be substantially decreased, hence achieving savings in energy costs whilst reducing CO₂ emissions and the overall building carbon footprint.

EWFA would therefore like to see more attention being paid to solar control technologies such as window film and others available in the market, since they do constitute an energy efficient solution to reduce the cooling and heating costs of a building. Other advantages of window film rely for instance on the installation and disposal phases. Installing window film has less of an environmental impact than creating a new window and disposing of the old one.

EWFA will continue to follow closely the development of criteria for the ecolabel and will continue to provide feedback as an active stakeholder

We remain at your disposal for any clarifications on what was exposed above.

EWFA is a registered organization on the European Commission's register of interest representatives: registration number 86497137168-71.

EWFA, European Window Film Association, represents and seeks to further the interests of the window film industry. It brings together manufacturers and distributors with the purpose of promoting window film products in the EU and highlighting their innovative performances and properties. For more information, please visit our website: www.ewfa.org