MINUTES

MEETING OF THE CONSULTATION FORUM UNDER ARTICLE 18 OF DIRECTIVE 2009/125/EC ON ENERGY-RELATED PRODUCTS ON WINDOW PRODUCTS

Brussels, 30 September 2015 (10.00 - 17.00)

Participants: See Annex.

Documents: The Commission services circulated the relevant working documents on 2 and 9 September 2015.

1. WELCOME AND INTRODUCTION

The Chair welcomed the participants and indicated that the purpose of the meeting was to discuss the proposed draft Energy Label Delegated Regulation on 'windows'. The agenda was adopted without changes.

2. GENERAL STATEMENTS ON WORKING DOCUMENTS ON WINDOWS

The Commission services presented the rationale for an EU Energy Label for windows (frame + glazing). No ecodesign measures were suggested as they are already well covered by Member States' (MS) implementation of the energy performance of buildings Directive (EPBD).

UK expressed doubts whether there is a trans-national market for windows and whether consumers need an EU label, considering most windows are bought following advice from installers.

DK referred to the possible conflict between the setting of minimum requirements for (new/replacement) windows at MS level following the EPBD and the free movement of products in the single EU market under the energy labelling Directive, as article 8 of this Directive states that "MS shall not .. impede the placing on the market (of products covered by the act)".

AT expressed doubts as to whether a 'simple' EU energy label is sufficiently capable of addressing the needs of consumers as climate conditions and orientations differ, etc.
DE agreed with UK as regards the relevance of the installer. DE had concerns regarding the administrative burden placed upon craftsmen who will have to provide, in addition to the conformity declaration under the construction products regulation (CPR), the various labels for windows, which are not standardised products. This label scheme might also imply additional burden in the context of market surveillance.

FI expressed doubts as regards the usefulness of an EU wide label considering the range in climate conditions to be covered and the need for more details on window performance specific to its installation.

BE stated that the EU energy label should be flexible taking into account specific local conditions. BE also expressed doubts on the usefulness of the suggested label for guiding consumers and for ‘pulling’ the market towards more energy efficient window products. This would depend on the content of the label and on the way it would be calculated.

SE supported the introduction of an EU energy label for windows as there is an EU wide market for window components (frames, glazing) and only assembly is local. The label will complement the CPR declaration of performance and will be useful in the dialog between installer and consumer. SE could support the suggested labelling scheme as a first step but would encourage the development of a more advanced and flexible label.

PT supported an EU energy label for windows, to be based on the working documents presented by Commission services as it would prevent the current confusion for consumers in case of imported labelled products.

IT supported an EU energy label for windows mainly to avoid the proliferation of various voluntary label schemes at national level which might be confusing for consumers in case of imported labelled products. The EU label should however be more flexible than currently proposed and not in conflict with national requirements of MS.

NO stated that an EU label would interfere with the EPBD and the national minimum requirements, especially now that buildings have to become nearly zero energy buildings (NZEB) in 2020. NO did not support the presented EU label: most windows in Norway would be in the same energy class. Moreover, lighting (which is important in buildings) is not taken into account. Finally, an EU label would lead to considerable administrative burden for suppliers.

FR had doubts about the effectiveness of the proposed EU label which would give a negative signal to the market and would be confusing for French consumers as most windows in France would be in class range F-G.

LV supported an EU energy label for windows, but preferred a more site-specific approach, taking better into account local climate conditions. LV suggested establishing separate labels per MS following EU guidelines.

DK and DE were concerned about the possible extra burden for suppliers by requiring additional measured values for certain window characteristics. Currently suppliers can declare under the CPR estimated values to cover a standard product instead of measured data for each product. However these estimated values cannot be used for identifying the energy class as they are not representative of the performance of the actual window.
ES agreed with IT and PT on the need for a unified energy label for windows in the EU. It indicated that the voluntary window label developed by national window manufacturers associations in Spain is not supported by the government. As regards an EU label, ES stated that the climate conditions in Spain (nine different climate conditions identified at national level under EPBD implementation) require a different label than currently proposed.

BE said that, in the context of the 28 different minimum energy requirements at national level under the EPBD, the number of climate conditions to be shown on the proposed EU label are too few to guide consumers to the best performing windows. To ensure effectiveness of the label, more complicated information needs to be shown on the label, which might be contrary to its consumer understanding. BE also indicated that a more complex model would be needed if local conditions are to be taken into consideration.

NL stated that the role of the label is not the same as the minimum requirements under the EPBD, which are based on cost optimality. As regards climate conditions, more information may lead to more complexity which is not always better. The label should be complementary to other information already provided to consumers.

GfE (Glass for Europe) stated that there is a EU single market for windows. The act of purchasing a window is often taking place at a local level but this does not mean that the windows are custom-made. The manufactured, standardised frames and types of glass are cut to size, but not necessarily custom-made. If windows would be custom-made, they would not need to be CE marked but they are. This shows that behind the local purchase act there are window, frame and glass industries working on an EU wide market. Therefore, GfE is in favour of a European label to avoid the fragmentation of the EU single market. The EU label is meant to bring clarity to end-users on window energy performance. It will subsequently drive innovation in the manufacturing sector beyond minimum performance requirements, which will remain set at national level.

FIEC considered that windows are not consumer goods. Construction products are standardised, but the final assembly and the installation works are not standardised. It indicated that from the construction industry perspective, the important issue is the increase of the renovation rate. They had doubts about the impact of the label for windows on this rate. It recognised the advisory role of the installer and the label to educate consumers, but noted that discussing window performance is quite complicated as the context of the (installation/renovation) works needs to be considered as well.

EW (Eurowindow) stated that most windows manufacturers and installers in the EU are SMEs. It indicated that a generic EU label risks misleading consumers (if the information provided to consumers is not correct), in which case the installer is held responsible. Furthermore, EW made clear that the energy saving potential presented in the Working Document is over estimated, and the EU energy label is pushing towards products that are not cost effective. EW suggested to indicate cost optimality information on the label too.

CEN/UFME stated that little is known on the reactions of consumers to the label and added that in any case a low rating for most of the windows on sale would most likely not help triggering renovation and transforming the window market.

CEN/SNFA stated that certain technical comments regarding window dimensions, orientation and climate zones, and the effect of the EPBD, have not been properly considered in the
preparatory study. As a result, good products (which are used in NZEB) are not properly rated in the proposed label and would get a bad rating.

**EEB** added that the role of a label should not be confused with the role of minimum requirements. The label is not only targeting the most economic (cost optimal) option but also a market transformation based on consumer decisions to purchase products with more energy savings despite the economic costs. It also indicated that the EPBD and CPR are not consumer-facing instruments. The proposed product label is not a perfect solution and should be improved, but a labelling instrument to provide information to consumers is needed. It suggested a 'package' label that could support the installer to facilitate the choice of window products suggested to the consumer.

**EA** (European Aluminium) asked for further information on the possible 'additional testing methods' beyond CPR required by current voluntary national labelling schemes as mentioned the Working Document. The **Commission services** indicated that ‘additional testing methods’ are required by the voluntary labelling schemes set in France (solar gains), Sweden (air leakage) and UK (air leakage and thermal transmittance).

### 3. Specific Statements on the Consultation Questions

**DK** pointed out, that the comments to the specific questions raised by the working document could not be taken as an endorsement of a EU labelling scheme of windows, but could only be seen as answers to the specific questions provided that a EU labelling scheme were to be decided.

#### 3.1. Consultation Question #1 - Subject matter and scope: include/exclude roof windows?

**DK, IT and FI** were against the inclusion of roof windows, the main argument being to proceed cautiously and start with most important window products.

**FI** indicated that other possible exclusions should be explored, such as those included in Article 5.a of CPR (construction product … individually manufactured or custom-made in a non-series process in response to a specific order, and installed in a single identified construction work…) and Article 5.c of CPR (construction product … manufactured in a traditional manner or in a manner appropriate to heritage conservation and in a non-industrial process for adequately renovating construction works officially protected …). This was also supported by **FAECF**.

**LV** could accept the inclusion of roof windows.

**BE and NO** indicated no preference.

**PT** indicated a preference for the inclusion of all windows in the scope (option 1), but is open for a compromise on excluding “roof windows”, insofar this would help to reach a consensus.

**BE** asked why, if roof windows are 9% of sales, they represent only 1% in savings. The **Commission** replied that this is due to the difference in window characteristics and market (roof windows are a much more standardised product).
ES-SO emphasised that measures to avoid overheating should be considered in particular for roof windows.

EW emphasised that it does not support EU energy labelling of windows as such. It does not make sense for façade windows, and it definitely does not make sense for roof windows because of the limited market share and energy savings reported.

DK referred to the two different sizes of windows included in the harmonised standard. This needs to be taken into consideration when asking manufacturers to calculate the energy performance.

EA explained that the interaction of the window with the external environment differs based on the size of the product and therefore asked whether large reference size windows would also be covered in the calculation method, and suggested to exclude products not considered in the calculation process undertaken in the preparatory study. FAECF supported this suggestion.

The Commission explained that the proposal in the working document can also be applied to smaller and larger windows than the reference dimensions (based on the window-to-floor area ratio, set at 20% in the preparatory study).

3.2. Consultation Question #2 - Subject matter and scope: include/exclude non-residential windows?

UK, IT, NL, DK, AT, PT, SE, EA, GfE preferred a label focused on windows intended for the residential sector.

FAECF indicated that the scope should be limited to replacement applications. For windows in new buildings there is no need for a label to inform the choice of products as there is always an architect involved in the building process.

EA and CEN/SNFA supported a label for small scale renovation in the residential sector. A label for the new or large renovation market would conflict with the holistic approach for such projects required under the EPBD. As regards how one can recognise windows for the different sectors, EA indicated that 90% of the windows are made to measure, which means that the final application (i.e. residential or non-residential) is normally known. EA was of the opinion that in these cases, consumers need personalised advice.

BE disagreed with the argument that in 90% of the cases, there is no need for further information to consumers.

GfE indicated that all existing labels in (or outside) the EU are targeting the residential sector only.

NL and IT indicated that it is difficult to limit the scope to the renovation sector, as the same window may be used for both new and refurbished buildings.

DE mentioned that a limitation of scope to residential could be problematic for 'mixed' buildings. The focus should be put on product properties and not on the final application.
LV indicated that the scope should not be limited to the residential sector.

NL considered that the label is an important tool also for manufacturers and installers who will benefit from condensed information in a label to promote their window products.

NL, SE and GfE considered that the energy label would be a good tool to drive innovation.

EW, however, believed there is no need for a label to drive innovation in the window sector as the existing EPBD is already providing sufficient drivers for this.

CEN/UFME stated that the focus should be on the way the window products are sold. The need for a label should then be limited to the cases where the consumers have no professional support to guide their choice, i.e. mainly products sold in ‘do-it-yourself’ shops.

3.3. Consultation Question #3 – Performance: heating and cooling combined or separated?

AT, IT, DE, DK, FI, LV preferred separated heating and cooling performances to allow for a distinction between good windows for the heating season and good windows in summer.

NL also expressed its preference for a separate approach on heating and cooling where shading and orientation are factors that need to be taken into account.

PT referred to combined performances complemented by other indication like summer comfort.

BE stated that the summer comfort and adaptive elements would need to be considered as well.

FR stated that the cooling performance of a window is not the same as summer comfort. It could be awkward to provide both indications on the same label.

CEN/SNFA recalled that there are heating systems in each building but this is not the case for the cooling systems. For that reason they are in favour of separated performances with an indication of summer comfort to allow end-users to assess the level of performance against overheating.

ES-SO preferred separated heating and cooling performances.

GfE expressed preference for a main rating system based on combined heating and cooling performance with additional information on summer comfort (overheating prevention indicator). This approach provides the simplest information for end-users while driving innovation. It is the only rating system taking into account the real climatic differences across the different climate zones: more heating in the North, more cooling in the South and something balanced in Central climates. It provides the only classification perfectly in line with the identification of BAT in the preparatory study.  

1 i.e. very low U value and high g value in the North, a good balance between a very low U value and a range of g value in the Central zone and low U and rather low g value in South.
EA preferred separated performances with consideration of adaptive elements and a cooling performance which is climate dependent.

3.4. Consultation Question #4 – Performance: adaptive elements to be considered or not?

AT and NL supported the indication of window (system) performances with consideration of integrated adaptive elements (i.e. being part of the window delivered).

IT stated that it prefers a system approach where the 'bare' window would receive an EU label, and a package label could take into account site specific and adaptive elements.

BE indicated that a package label could allow manufacturers of adaptive elements and of bare windows to combine their products to provide more complete information of the window system.

PT supported the option of not including adaptive elements, since adaptive elements performance is depending on consumer/end user behaviour which entails a dynamic element difficult to predict and evaluate. To consider only the window as a sole product (frame and glass) is the best option, it is more conservative and ensures that consumers will have a better and predictable energy performance.

DE was not in favour of considering adaptive elements in window performance rating. In some cases, the adaptive elements may not result in any difference in performance (e.g. in case of existing external shading). This may steer the market towards better labelled windows with integrated adaptive elements, at the expense of elements sold separately.

ES-SO, CEN/SNFA, FAECF and EA agreed on the indication of window performance including consideration of integrated adaptive elements, as these windows offer the best possible performances.

ES-SO was also in favour of extending the scope to ‘non-integrated’ adaptive elements (i.e. existing or separately delivered elements).

GfE opposed presenting window performances with consideration of adaptive elements, as this may risk consumers to select windows on assumed behaviour that will not be met in real life. Subsequently, it will incite consumers in southern Europe to opt for windows generating massive over-heating problems (which would then be supposedly countered by keeping shutters closed permanently) while their need is the complete opposite. GfE noted that adaptive elements do not represent the lowest least life cycle cost option in most conditions, unlike what was previously stated.

EA further indicated that shading devices (adaptive elements) can almost eliminate the need for cooling in Central climatic conditions and reduce it by 50% in Southern climatic conditions. An installer label could take into account site specific (orientation, climate, existing external shading devices, etc.) and additional adaptive elements.

ANEC/BEUC expressed reservations about the inclusion of adaptive elements in the calculation of window performances.
3.5. Consultation Questions #5 and #6 - Consideration of summer and winter comfort?

DK and FI expressed their preference for a separate approach and therefore disagreed with the indication of summer and winter comfort.

NL indicated that the replies to these questions are subordinated to the previous questions on the main parameters, where shading and orientation need to be taken into account.

GfE was in favour of a 'combined' approach with consideration of summer comfort (which could be based on the solar factor). They do not see an added value for a winter comfort indicator (which is adequately covered by combined approach).

CEN/SNFA supported the indication of summer and winter comfort in the label.

ES-SO preferred separated rating for heating and cooling performances in the label. Additionally they suggested that the empty A-B energy classes could be used for performances of windows with ‘automated’ adaptive elements.

EA, not being supportive of a combined value for Question #3, did not consider these questions as relevant.

3.6. Consultation Questions #7 and #8 - Other information on label, inclusion of EU map?

DK could accept to have ‘thermal transmittance’ (UW) and ‘daylight potential’ in the label but would prefer to have the suggested additional information in the ‘product information sheet’. Concerning the inclusion of a map on the label, they prefer to have the situation where heating and cooling zones are presented separately.

LV would agree with the inclusion of the UW value on the label but warned of the danger to overloading the label with information. The suggested maps are not the best options for manufacturers.

AT did not support the inclusion of the suggested map which would not give any support to installers and end-users as it is not representative of the real conditions. They supported the inclusion of daylight potential on the label. Quality of transmitted daylight could also be an issue. The information on sound insulation could also be interesting.

SE supported the inclusion of daylight potential on the label (in relation to the primary function of a window which consists in getting daylight in the room). They did not see any problem in complementing the CPR. They underlined the importance of the label in providing richer information that installers can use when communicating with customers.

IT stated that the required information (in particular noise performance) should either be mandatory or not required at all. They supported the inclusion of daylight potential on the label.

BE endorsed inclusion of daylight potential on the label (in relation to the expected change of the energy balance in the room due to the probable re-sizing of the window to maintain the daylight comfort).
NL supported the inclusion of additional performance parameters in the ‘product information sheet’ as support for more local conditions calculation. Including these in the label is superfluous and would overload the label.

NO, FIEC stated that overlap with other available technical information (i.e. declaration of performance and CE marking under CPR) should be avoided.

CEN/SNFA indicated that the European standard for window products is under revision and some new energy characteristics are being developed such as radiation properties (solar factor, light transmittance) for the whole window (including frame).

EA stated that if the window is made to measure and chosen with the help of an installer label/calculator, an EU map is not necessary. The inclusion of daylight potential is useful, in relation to the electricity consumption for lighting. The inclusion of sound insulation is not supported: it is a wrong message to consumers, as windows do not emit noise themselves and can only aid to reduce/suppress noise from other sources; it is also considered burdensome as additional tests would be needed. The mandatory ‘Declaration of performance’ of particular essential characteristics of the windows can be required through delegated acts under Article 3(3) of the CPR. QR codes could be helpful to guide consumers to more information on the product (e.g. declaration of performance, product information sheet), avoiding the need to include such information on the label itself.

EW recalled that they are not in favour of the EU label. They made a plea to conduct a consumer survey to investigate the effects of possible misguiding elements in the label. They were not in favour of the inclusion of climate conditions in an EU map. They instead suggested dealing with windows under the EPBD following the energy balance approach as presented in the working documents.

3.7. Consultation Question #9 - Installer label?

IT presented an approach based on an EU label or fiche for the 'bare' window combined with a separate 'package' (or installer) label or fiche with energy performance classes or ratings based on the ‘payback period’ for window (and any adaptive elements) that uses software and inputs reflecting local conditions for calculating a more site-specific performance. The Commission Services would be responsible for the development and maintenance of this ‘optimisation installation’ software. Another software tool might be useful for SMEs to link the two 'labels'. Additionally, IT indicated that QR codes should not be the tool to give additional information, but only a tool to obtain the label in digitalised form to avoid discrimination between those customers who know how to use a QR code and those who are electronically illiterate.

DE indicated that providing more tools and more details would result in a shift from an informative label concept to a formalised advice or an energy budgeting tool. It would be the only way to cover adaptive elements without creating market distortion when they are not provided by the same supplier. The tool however needs to be easy to use for any single manufacturer or installer and there should be a clear distribution of responsibilities for accuracy of the inputs and results.

DK expressed reluctance and mentioned that there is no experience yet in the application of installer labels as the one for space and water heaters applies only as of September 2015. It
added that there may be no need for an energy label for consumers, but a need for a calculation tool to assist installers in their communication towards consumers.

**BE** supported the idea of a label calculator simplifying the tasks of SMEs. Such a tool would have to be simple to use by every kind of manufacturing and installing company. It would also be helpful to have this label calculator connected to a comprehensive database fed by private companies.

**NL** encouraged the Commission services, in reference to the suggestion from IT, to look at the possibility to establish an EU installer label based on software and digital information (through QR code, website, etc.). NL agreed with IT as regards the use of the QR code.

**SE** supported the suggestion from IT as there are no simple products anymore. It is necessary to explore new routes such as the installer label. However, a rating will remain problematic, especially if the top two classes are to remain empty.

**UK** partly supported the IT suggestion but also the DK comments that a calculation tool would be more helpful than a label, provided it can be used also by SMEs.

**PT** could support the concept of EU installer label, but the Commission Services would have to be responsible for the publication and maintenance of any software solution (including helpdesk facilities).

**LV** supported the ‘installer label’ suggestion.

**AT** supported the idea to further develop the approach of a tool for installers.

**FIEC** supported the idea of employing a software tool to calculate more site specific window performances but this tool should not be used for determining a label. Such a label would place a tremendous burden on SMEs.

**EW** was not directly opposed to a more site-specific guidance tool approach, but emphasised that it needs to be more elaborated. Furthermore EW stated that it might make more sense to look at e.g. Article 4.1 of EPBD, to include energy balance and to strengthen it.

**ANEC/BEUC** supported the concept of a labelling scheme for windows, but in reference to the difficulty of this specific product they indicated the need for a consumer survey.

**FAECF** was not in favour of an EU energy label, but added that a tool for installers could be useful, taking into account possible concerns on implementation, administrative burden and need for consumers survey.

**EA** were not in favour of a generic label which would apply only to around 10% of the windows placed on the market. However they fully supported the installer label concept as a web tool which would take into account inter alia shading device effects (including existing ones), the more specific local climate conditions, and the orientation and the right window size. This option would allow for the optimisation of products based on site specific aspects, beyond the generic definition of BATs. The overall energy impact of the package of the different installed windows (sliding, tilt and turn, opaque, etc.) could also be taken into account. They stated that 90% of the windows are made to measure (knowing their final destination) for which more site-specific information on energy performance would further
support the dialog between installer and consumer. This personalised optimisation tool will allow the best payback for consumers and will stimulate higher renovation rates.

**ES-SO** supported the comments from EA. They were in favour of developing such a software tool to take into account more site specific performances (e.g. location, orientation). This tool will have to be based on an improved methodology to deal with the 90% of windows made to measure. The software could also be used as a guidance tool.

**ORGALIME** stated that any future label on windows should not promote more costly and material-intensive products than needed. They were not in favour of a generic label suitable for less than 10% of the market which would result in increased administrative burdens. They suggested using other instruments such as the EPBD and CPR to guide consumers towards the best energy-performing windows.

**GfE** expressed concerns about this installer label (or design optimisation) as it is currently unknown what it actually means or does. GfE stated that the target of the instrument should remain the end-consumer who is in need of a label to help inform his purchase decision and should not be the installer, who should be already skilled to make recommendations.

4. **SPECIFIC STATEMENTS ON THE DRAFT IMPLEMENTING MEASURE DOCUMENT**

**DE** commented on the ‘product compliance verification procedure by market surveillance authorities’; testing a window in a laboratory implies producing a standard size window to put on the test stand. As normally an actual window does not have this standardised shape and size, the results of such testing will be different from the results expected from real windows on the market. The results of the ‘1 + 3’ samples might be less meaningful, not only because they are imprecise compared to reality (different sizes and tolerances), but also because of the so-called ‘golden sample’ effect. They also referred to point 2(a) in Annex IX of the draft implementing measure document to indicate the need to further clarify the meaning of ‘more favourable’ in the context of windows, as certain characteristics may be both more or less favourable depending on conditions.

**BE** was concerned by the possible need for additional tests (to cover for instance shading elements) beyond those currently performed under the CPR.

**ES-SO** indicated that the shading elements are covered by the CE marking under the CPR.

**DK** stated that an EU energy label for windows has no future if the authorities cannot enforce the regulation. They stated that the performance of windows in the Danish market has improved radically with the support of the voluntary private Danish labelling scheme – which is aligned with national legislation on building components – while cost-effectiveness has been rising. Consequently there is very little added value for an EU label.

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2 See Annex IX of the draft implementing measure document

3 This refers to the situation where samples are not representative of products placed on the market because they are made as good as possible for verification purposes by MSAs but not necessarily as cheaply as possible to compete in the real market
IT indicated that technical information related to both energy labelling and the CPR could be merged. However MSAs should have the possibility to check all parameters linked to a possible future EU label, beyond the CPR-related enforcement measures.

The Chair summarised the discussion and requested further written comments from stakeholders by 30 October 2015 at the latest.

The Chair indicated that a new discussion with the Consultation Forum might be needed for this product group based on further analysis of the 'installer' label option, also taking into account the outcome of the ongoing discussions on a revised Energy labelling framework regulation.

5. AOB

The Chair indicated that the date for the review of the energy labelling regulation for air-conditioning (due by 24 May 2016) should be combined with the date for the review of the ecodesign regulation for air-conditioning due on 26 March 2017, also in the context of the ongoing revision of the energy labelling framework legislation. The Consultation Forum did not object to this approach.

The Chair mentioned the forthcoming meetings in the context of Energy labelling and Ecodesign and replied to further questions on ongoing work.

The Chair thanked the participants and closed the meeting.
ANNEX – ATTENDANCE LIST

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