

From: [REDACTED]
Subject: FW: Taxonomy - Comments and proposals from Glass for Europe and the flat glass and glazing sector
Date: mercredi 16 décembre 2020 09:44:46
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[GfE-Comments-Taxonomy-14122020.pdf](#)
Importance: High

From: [REDACTED] Glass for Europe
December 15, 2020 4:46 PM
To: [REDACTED]
Subject: Taxonomy - Comments and proposals from Glass for Europe and the flat glass and glazing sector
Importance: High

Dear [REDACTED],

With this e-mail, I would like to bring to your attention the below and enclosed [Glass for Europe contribution to the consultation on the draft delegated acts on taxonomy](#).

I though you may find it interesting and may want to relay it inside the Commission. As you both know, the flat glass sector is all about enabling massive CO2 savings in many sectors so it would be awkward that it is not adequately covered under the taxonomy...

Glass for Europe is the trade association of Europe's flat glass sector. The European flat glass sector takes it as its role to produce the materials essential for conducting energy-efficient renovations of buildings, for supporting clean mobility with lighter and thermally efficient automotive glazing and for increasing the share of renewable solar energy in Europe. Considering that these above usages represent over 99% of flat glass production, [Glass for Europe considers that its manufacturing and processing activities should be covered under the taxonomy](#) to support the industry in its journey towards realising climate neutrality in Europe: [link to Glass for Europe 2050 vision](#)

With this e-mail I want to [raise your attention on two items](#) of prime importance in relation to the latest draft under consultation

- 1 The flat glass transformation and processing [NACE code C23.12 needs to be added under items 3.4 of both annexes](#). This code covers the production of double and triple glazing, which are indispensable to the CO2 savings properties of windows hence the importance of this code to be covered
- 2 Alongside other window partners, we strongly suggest that [the performance standard to be achieved for window manufacturing needs to be revisited and we would like to propose a U-value of 1.0 W/m2K](#) instead of 0,7. Windows of a U-value lower or equal to 0,7 are niche products adapted to Europe's most northern and coldest climates only. We fear that setting such a U value for window manufacturing in the Taxonomy could thus run counter-productive to the EU Renovation Wave's ambition and could hinder affordability of window replacement across most of Europe. The proposed level of 1,0 W/m2K remains an extremely high performance standard that would deliver massive CO2 savings – [link to TNO study on CO2 savings from glazing](#). It is in fact much stricter than most national requirements – [link to Ecofys study on minimum performance requirements or windows across Member States](#) – and current market structures

The enclosed contribution will provide you more information on the rationale for these asks

Considering our sector's interest and willingness to maximise our contribution to climate neutrality, the flat glass sector is really looking forward a successful taxonomy scheme. We therefore thank you in advance for considering the enclosed input, which was also formally submitted as a response to the consultation

I remain at your disposal to discuss these issues further and look forward a revised and successful taxonomy scheme

Kind Regards,

Glass for Europe is teleworking. Please, call me on my mobile [REDACTED]

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