

Glass for Europe's comments to

Sustainable finance – EU classification system for green investments

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 activities should be covered under the taxonomy** with adequate technical screening criteria. In this respect, Glass for Europe would like to comment on three items of annexes 1 and 2 of the draft delegated act.

1. NACE code C23.12 to be added under sections 3.4

In both Annexes, section 3.4 “*Manufacture of energy efficiency equipment for buildings*” rightly identifies the manufacturing of high-performance windows and their key components. All NACE codes covering the production of such windows and their key components are listed but one.

NACE code C23.12 “Shaping and processing and flat glass” is missing and should be added to the list. This code is essential since it covers the fabrication of insulating glass units (IGU), i.e. the required ‘double or triple glazing’. The IGU (Prodcom code 23.12.13.30) represents between 70 and 80% of the surface area of a window and is a key component affecting efficiency, **as demonstrated by the recent TNO study on CO₂ savings from glazing¹**. Both NACE codes C23.11 and C23.12 should be covered: flat glass production and application of high-performance coatings (C23.11) and cutting and fabrication of high-performance IGUs (C23.12).

2. 0.7 W/m²K U value for windows needs to be amended

In the section 3.4 of both annexes, the technical screening criteria on contribution to climate change mitigation / adaptation is defined as “*windows with U-value lower or equal to 0,7 W/m²K*”.

Glass for Europe wishes to state that it is impossible to define a unique set of energy performance specifications for windows in all buildings across Europe and that the U-value of a window is only one of several parameters that affect the energy performance of products.

¹¹ Potential impact of high-performance glazing on energy and CO₂ savings in Europe, TNO, 2019.

However, Glass for Europe recognises that a simple indicator needs to be used for the purpose of the Taxonomy.

Glass for Europe wishes to stress that while windows of a U-value lower or equal to 0,7 can be technically delivered, these are adapted to Europe's most northern and coldest climates only. They are unnecessary to reach nearly zero energy standards across most of Europe therefore they are likely to remain expensive niche products. Setting such a U value for window manufacturing in the Taxonomy could run counter-productive to the EU Renovation Wave's ambition to increase energy efficient renovations of buildings and could hinder affordability of window replacement.

Based on the above and after discussion with window manufacturers, **Glass for Europe suggests that the technical criteria is rephrased accordingly: 'U-value lower or equal to 1,0 W/m²K'.**

Such a performance level is more challenging than **minimum performance requirements set by most Member States according to the EPBD²** and requires the use of highly-thermally insulating glazing units that massively contribute to decarbonising EU buildings. Such an ambitious performance level would already send a strong signal to investors and support the industry's efforts in developing ever-better performing products adapted all European climates.

3. Manufacture of low carbon technologies for transport

Glass for Europe regrets that both flat glass NACE codes, i.e. C23.11 and C23.12, are not listed under the heading 3.3 '*manufacture of low carbon technologies for transport*' considering that the glazing specification can have a sizable impact on the efficiency and CO₂ emissions from transport vehicles. **Glass for Europe would like to engage in defining technical screening criteria for these essential components of low carbon transport in a future work on taxonomy.**

Glass for Europe is the trade association for Europe's flat glass sector. Flat glass is the material that goes into a variety of end products, primarily in windows and facades for buildings, windscreens and windows for automotive and transport as well as solar energy equipment, furniture and appliances. Glass for Europe brings together multinational firms and thousands of SMEs across Europe, to represent the entire building glass value-chain. It is composed of flat glass manufacturers, AGC Glass Europe, Guardian, NSG-Group and Saint-Gobain Glass Industry, and works in association with national partners gathering thousands of building glass processors and transformers all over Europe.

² Minimum performance requirements for window replacement in the residential sector, ECOFYS, 2017.