

POSITION PAPER

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EuroACE position on the recasting of the EU Energy Performance of Buildings Directive

The EU Energy Performance of Buildings Directive (EPBD – 2002/91/EC) is the key legislative instrument to improve the energy use of new and existing buildings across the EU. However, this Directive was a starting step for action, leaving room for improving the effectiveness and extending the scope at a later date. The European institutions are currently in the process of recasting the EPBD, with a Commission proposal presented in November 2008 (COM(2008)780) and a European Parliament first reading adopted in April 2009 (T6-0278/2009).

EuroACE believes that there are **three key areas** that must be included in the final text if Europe is to reap the projected benefits of a 5-6% reduction in final energy used by 2020, a 4-5% reduction in total CO₂ emissions by 2020, a cost savings of 25 billion annually for the European economy, and the creation of 450,000 direct jobs in the construction sector. These three points are also essential for Europe to prove its leadership position at the Copenhagen climate change talks in December. These are:

1. All Building Codes must be required to include a critical path towards “**very low energy buildings**” for both new and existing buildings. Any definition adopted to facilitate this, such as zero net energy, must be explicitly underpinned by the Trias Energetica.
2. Major and minor refurbishment must be required to result in increased energy efficiency via **best rated component replacement** where appropriate and, to this end, minimum energy performance requirements for building envelope components and technical building systems (“building element”) should be mandated by the recast.
3. There must be a requirement for Member States to introduce **financial instruments**, which should be linked to the Energy Performance Certificate (EPC), within Action Plans covering financing the move to very low energy buildings to be submitted by 2011.

In addition to these points, EuroACE wishes to reaffirm its position on other important aspects that need to be included in the final text in order to ensure a strong recast:

- All the 1000m² thresholds should be completely removed.
- Provisions for a national oversight scheme in Member States must be introduced to ensure that local and regional governments monitor compliance effectively.
- The EPC system must be strengthened by harmonising the EPC format for non-residential buildings across the EU; by making the display of EPCs mandatory in all larger buildings to which the public has access, as well as in all public buildings, regardless of size; and by requiring landlords to inform tenants of the recommendations covered whenever an EPC is issued for the occupied building.

- The accreditation of inspectors of installations and of those who issue EPCs should also be harmonised, and Member States must mutually recognise training programmes for such personnel.
- The public sector should lead the way and implement the EPC recommendations for energy efficiency improvements within the lifetime of the EPC.
- Last but not least, inspections of heating and cooling installations and of ventilation systems should cover the entire system, not just certain components of a system.

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EuroACE was formed in 1998 by twenty of Europe's leading companies involved with the manufacture, distribution and installation of energy saving goods and services. EuroACE members have a total turnover of 140 billion euros and employ 328,000 people. The mission of EuroACE is to work together with the European institutions to help Europe move towards a more sustainable pattern of energy use in buildings, thereby contributing to Europe's commitments on climate change, job creation and energy security.

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