Consultation on the revision of the Energy Performance of Buildings Directive 2010/31/EU

Eurelectric response paper

June 2021

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:
- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

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WG Electrification & Energy Efficiency (Lead)
WG E-mobility
WG RES & Storage
WG Customers & New Services
WG Technology

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KEY MESSAGES

June 2021

- The energy performance of buildings is a critical issue to tackle in order to reach a climate neutral economy. With 40% of the total EU energy consumption used to heat or cool buildings, improved standard and targets are essential aspects of the task. Following the Renovation Wave Strategy, Eurelectric fully supports the revision of the Energy Performance of Building Directive (EPBD).

- Enhance the energy and climate performance of all buildings (public and private, non-residential and residential) is key to reduce their carbon-footprint towards a "near-zero energy and emission building" target. Therefore, we support an increased and more stringent ambition for buildings decarbonisation at European level. Dedicated tools, schemes and supports should be developed to improve energy efficiency across the EU.

- The EPBD needs to ensure that buildings are smart and climate resilient. Alongside higher buildings renovation rates, the revision can foster synergies with other sectors, primarily the energy one. Improved energy efficiency in buildings will only be achievable by a system-wide approach to fully leverage the potential of highly efficient, smart and flexible buildings.

- The right incentives for investments should be also developed and collective charging infrastructure deployed at least in new buildings and buildings subject to major renovations. The revision should aim to give all Europeans the 'right to plug', on a level playing field, by improving and speeding up permitting procedures. At the same time, the EPBD needs to support the implementation of smart charging to foster efficient decarbonisation of both transport and energy sectors.

- The integration of electricity in buildings is essential to reduce their carbon footprint, supporting the switch from old fossil-fuel based heating systems to low-carbon energy solutions. Power-based solutions are already available to improve the energy efficiency of buildings while reduce air pollution, GHG emissions and improve living conditions.

- However, affordability and up-front costs of low-carbon solutions (EVs, PVs, batteries, high efficient and decarbonised district heating & cooling or electric heat pumps) are sometimes holding back consumers from engaging in the energy transition, especially low-income households that might benefit the most from adopting them. Energy efficiency measures can be implemented in ways to benefit low-income households by financing them via revenues coming from different sources.

- The EPBD revision should be coherently implemented within the “Fit for 55 Package” - while avoiding policy overlaps - together with the revision of other pieces of the regulatory framework, in particular the Energy Efficiency Directive (EED) and the Alternative Fuels Infrastructure Directive (AFID) as well as policy updates on GHG emission reduction in non-ETS sectors. The revision should also be articulated with the other national energy policy instruments, namely, the National Energy and Climate Plan 2030 (NECP 2030), the Long-Term Renovation Strategies (LTRS) and the Energy Poverty Strategy for each Member State.

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Introduction

As announced in the European Green Deal, the Commission adopted on 14 October 2020 a strategic Communication "Renovation Wave for Europe - greening our buildings, creating jobs, improving lives". It contains an action plan with specific regulatory, financing and enabling measures for the years to come and pursues the aim to at least double the annual energy renovation rate of buildings by 2030 and to foster deep renovations. It is expected that mobilising forces at all levels towards these goals will result in 35 million building units renovated by 2030.

The Renovation Wave confirms that the existing legislative measures on buildings will neither suffice to achieve the increased EU 2030 climate target of at least 55% emission reduction target and the planned increase in the ambition for energy efficiency, nor the 2050 climate neutrality objective. Therefore, the Renovation Wave communication announces a revision of the Energy Performance of Buildings Directive 2010/31/EU (EPBD) together with a number of areas of legislative and non-legislative reinforcement in relation to building renovation and decarbonisation of buildings. The EPBD is the cornerstone of European legislation in the area of energy performance of buildings. It aims at accelerating the transformation of the EU building stock into a highly energy efficient and decarbonised building stock by 2050.

The Renovation Wave already indicated some specific aspects which will be addressed in the revision of the EPBD, namely: the phased introduction of mandatory minimum energy performance standards for all types of buildings (public and private), an update of the framework for Energy Performance Certificates, the introduction of Building Renovation Passports and the introduction of a 'deep renovation' standard in the context of financing and building decarbonisation objectives. The requirements for new buildings and measures fostering sustainable mobility are also considered to be updated in line with the enhanced climate ambition of the European Green Deal and the Climate Target Plan 2030. This includes addressing resource efficiency and circularity principles in order to reduce whole lifecycle emissions, digitalisation in design, construction and operation of buildings, climate resilience and health and environmental requirements, as well as accessibility for persons with disabilities, and energy poverty, requires consideration. More information is provided in the Inception Impact Assessment.

This questionnaire is part of a larger stakeholder consultation which will feed into the Commission's work on the revision of the EPBD. It builds upon the results from the very extensive and in-depth public consultation for the Renovation Wave that took place between January and September 2020, whose results have been assessed in a dedicated report.

About you

* Language of my contribution

- ( ) Bulgarian
- ( ) Croatian
- ( ) Czech
- ( ) Danish
- ( ) Dutch
- (•) English
- ( ) Estonian
- ( ) Finnish
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- ( ) Italian
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- ( ) Swedish

* I am giving my contribution as

- ( ) Academic/research institution
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- (•) Company/business organisation
- ( ) Consumer organisation
- ( ) EU citizen
- ( ) Environmental organisation

- ( ) Non-EU citizen
- ( ) Non-governmental organisation (NGO)
- ( ) Public authority
- ( ) Trade union
- ( ) Other

* First name

Gilda

* Surname

Amorosi

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gamorosi@eurelectric.org

* Organisation name

255 character(s) maximum

Eurelectric

* Organisation size

- ( ) Micro (1 to 9 employees)
- (•) Small (10 to 49 employees)
- ( ) Medium (50 to 249 employees)
- ( ) Large (250 or more)

Transparency register number

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Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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* Country of origin

Please add your country of origin, or that of your organisation.

- ( ) Afghanistan
- ( ) Åland Islands
- ( ) Djibouti
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- ( ) Libya
- ( ) Liechtenstein
- ( ) Saint Martin
- ( ) Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
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- Bangladesh
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- Finland
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- French Polynesia
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- Germany
- Ghana
- Gibraltar
- Greece
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname

- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine

- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
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- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
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- Saint Lucia
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- United States
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Part A. Planning and policy instruments

Decarbonisation of buildings

Question 1. The long-term decarbonisation strategy has introduced the concept of zero emission buildings by 2050, in view of achieving carbon neutrality in the long term. Do you agree that such a novel concept should be defined in the EPBD?

- ◉ Yes
- ○ No, it is not needed in the EPBD
- ○ No opinion

If yes,

- ☐ It should include greenhouse gas emissions covering the whole life-cycle of buildings
- ☑ It should include minimum renewable energy share in buildings and city neighbourhoods
- ☑ It should refer to a timeline to gradually phase out fossil fuels, in particular for heating and cooling systems

☑ Other - please specify in comment box

* Please specify:

500 character(s) maximum

The directive should prioritize RES and low carbon technologies able to contribute to energy efficiency and climate performance of buildings while a) considering a broader scope of externalities like air quality and health impacts b) including a plan for a gradual phase-out of fossil fuels for H&C. The directive should include minimum levels of EV charging infrastructure available, as 80% of charging will take place at home or in the workplace. A LCA can be foreseen for new buildings.

Question 2. Long-Term Renovation Strategies (LTRS) set the vision, roadmap, concrete policy measures and actions, and dedicated financing mechanisms to decarbonise national building stocks by 2050. The first 13 LTRS submitted have been assessed by the Commission. Under the existing legal framework the LTRS are due every 10 years, with a possibility for updates as foreseen under the Governance Regulation.
Should the EPBD provisions on the Long Term Renovation Strategies be modified?

○ Yes
◉ No

Question 3. Should the monitoring of the objectives identified by MSs in their LTRS be strengthened?

◉ Yes
○ No

If yes,

☑ Through a specific monitoring tool to be developed by the Commission
☐ By requiring a 5-year revision of the LTRS
☑ By developing a common template and requesting specific data and indicators, in order to make the information provided by Member States more comparable
☑ By requesting more data, especially on greenhouse gas emission effects, to allow assessing the contributions to the EU climate policy targets
☑ By linking the LTRS to other policies (heating and cooling, renewables, products, etc.)
☑ Other - please specify in comment box
☐ No opinion

* Please specify:

500 character(s) maximum

LTRS should be monitored more closely. Strategies may be agreed together with the Commission based on a harmonised template and regular review can be foreseen. The current LTRS do not seem to reflect the scale of building renovation required to reach 2030 targets at the moment. The Commission should also provide technical support to Member States that would benefit from knowledge-sharing and best practices.

Question 4. Which measures would you add in the EPBD to further support district and city authorities to increase energy efficiency in buildings and to accelerate the rate of replacement of boilers by carbon free ones based on renewable energy?

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Many district and city authorities lack the necessary capacity to implement, aggregate and finance energy efficiency projects in buildings. Several solutions can be adopted: [1] public one-stop-shop approaches that cover the whole customer journey from information, technical assistance, structuring and provision of financial support; [2] complementary policy actions that progressively eliminate the least efficient products from the marketplace putting forward policies that prohibit the sale of energy and carbon-intensive technologies in order to fast forward the rate of replacement of boilers by carbon free ones based on renewable energy; [3] ESCO, by offering services against payment, and therefore limiting the investment risk to the customers with the main goal of facilitating improved efficiency; [4] Financial support to implement solutions towards the electrification of energy consumption for heating and cooling (eg, to finance the civil works to switch from fossil fuels).

Resource efficiency and climate resilience in buildings renovation

The European Green Deal points to energy and resource efficiency. Following this, the new Circular Economy Action Plan (CEAP) adopted in March 2020 acknowledges that reaching climate neutrality by 2050 requires highly energy and resource efficient buildings equipped with renewable energy, considering life cycle performance and a more efficient use of resources for building renovation and construction. The Renovation Wave equally sets our actions in this regard, such as the development of a 2050 whole life cycle performance roadmap to reduce carbon emissions from buildings.

Question 5. Do you think a revised EPBD should include measures to report on whole life-cycle carbon emissions from buildings (manufacturing and construction, use and end of life)?

- (●) Yes
- ( ) No, the EPBD is not the right tool for this
- ( ) I don't know/ No opinion

If yes,

- [x] For all buildings (new buildings and renovations)
- [ ] For all new buildings
- [ ] For renovations only

- [ ] For all new public buildings
- [ ] For renovations of public buildings only
- [ ] For a subset of private non-residential buildings such as shopping centres or datacenters
- [x] The opportunity should be considered in the context of the revision evaluation mandated for 2026

Comment:

500 character(s) maximum

Building life-cycle carbon emissions standards or, depending on the building, carbon emissions standards during the operational phase could help raise awareness of carbon emissions, guiding the market to evaluate carbon intensity of EU building stock. The lack of harmonised life cycle accounting tools, the compatibility with other legislation covering emissions in buildings as well as considerations on who in the supply chain would be responsible need to be addressed as well.

Question 6. Should the EPBD require that the likely impacts of climate change are taken into account in the planning of new buildings and major renovations?

- (•) Yes
- ( ) No, the EPBD is not the right tool for this
- ( ) No opinion

If yes,

- [x] For new private buildings (residential and non-residential)
- [x] For new public buildings
- [x] For private renovations
- [x] For renovations of public buildings
- [ ] In the case of private buildings, only if they are above a certain size
- [ ] In case of private buildings, only for a subset of non-residential buildings such as offices or commercial buildings
- [ ] The opportunity should be considered in the context of the revision evaluation mandated for 2026

Question 7. As announced in the Renovation Wave, the Commission will develop a 2050 whole life-cycle performance roadmap[1] to reduce carbon emissions from buildings and advancing national benchmarking with Member States. How do you think the EPBD could contribute to this roadmap?

1000 character(s) maximum

EPBD could contribute to this roadmap establishing the approaches that will be undertaken to the standards, e.g, the stages of the process and the targets that should be considered in the building life-cycle and the methodology. EPBD should set Member State wide measures to monitor GHG emissions and energy consumption from buildings. EPCs and Passport need to be implemented in all buildings in order to build up inventories that can guide present and future action plans and LTRS from Member States. Depending on the building, the energy performance certificates could be expanded to include life cycle balance parameters (e. g. recycled content) in an unbureaucratic, practical and user-oriented manner. An extension must not lead to disproportionately high expenditure in the issuing practice. Moreover, national and local technical and economic barriers for the decarbonisation of large district heating systems should be acknowledged and addressed.

[1]The Roadmap is one of the actions foreseen in the Renovation Wave Communication (COM(2020) 662 final) to make the construction ecosystem fit to deliver sustainable renovation.

Nearly zero-energy buildings (NZEB)

Question 8. The EPBD requires all new buildings from 2021 (public buildings from 2019) to be nearly zero-energy buildings (NZEB). According to Article 2 "nearly zero-energy building" means a building that has a very high energy performance, as determined in accordance with Annex I. The nearly zero or very low amount of energy required should be covered to a very significant extent from renewable sources, including sources produced on-site or nearby. Do you think that the current definitions for NZEBs are ambitious enough to contribute towards a fully decarbonised building stock?

- ○ Yes, the current definition is ambitious enough
- ◉ No
- ○ No opinion

If no,

- ☑ The current definition should be updated to put clear limits to energy use and minimum levels of renewables and incorporate green-house gas emissions targets
- ☐ The current definition should be replaced by a definition of “zero emissions buildings”
- ☑ Other - please specify in comment box

* Please specify:

500 character(s) maximum

NZEB must take into account that availability of EV charging infrastructure is critical. Ensuring that buildings offers to charge/discharge EVs, particularly during periods of increased/reduced generation from intermittent RES.Moreover, minimum thresholds on final energy consumption, RES (on-site or not), smart readiness and DR should be added to the definition.H&C facilities incorporated should carry the highest standards in energy efficiency and climate performance such as electric heat pumps.

Question 9. Numeric thresholds or ranges for NZEBs are not defined in the EPBD. While this allows Member States to set their NZEB levels taking into account their national context, it also results in widely differing definitions from country to country. Is a more harmonised definition of NZEB necessary?

- ○ Yes
- ○ No, it is not necessary
- ◉ I don't know/ No opinion

Deeper building renovations

Question 10. Deep renovation is understood to be a renovation that should generate at least 60% energy savings, whether carried out in a single stage or in a number of staged renovations. In your view, would it be beneficial to provide a legal definition of “deep renovation” in the EPBD?

- ◉ Yes
- ○ No, a definition would add further complexity
- ○ I don't know/ No opinion

If yes,

- ☐ The definition should relate to energy savings only
- ☑ The definition should relate to energy savings also expressed in terms of greenhouse gas emissions related to the use of energy
- ☑ The definition should relate to both operational and embodied greenhouse gas emissions covering emissions from the full life-cycle of buildings
- ☑ The definition should cover broader aspects that have an impact on the quality of renovations, such as health and environmental standards, accessibility for persons with disabilities, climate resilience or others - please specify in comment box
- ☐ Other - please specify in comment box

* Other broad aspects? Please specify:

500 character(s) maximum

Contribution to outdoor/indoor air quality is a key parameter for renovations, as buildings are the biggest contributors to Particulate Matter emissions. Carbon emission reduction should be taken into account as well for consistency with the climate neutrality target.
The definition of 'renovation' should be revised to include smaller renovations and require at least the preparation of the infrastructure (cabling, ducting) to make all buildings "EV charging ready" by 2035 and EHP ready by 2030.

Mandatory minimum energy performance standards ('MEPS')

Mandatory renovation/minimum performance requirements are one of the most impactful measures for increasing the rate of building renovation and have already been explored and implemented in some Member States. Their aim is to firm up investors' expectations by setting a path for the improvement of the energy performance of different classes of buildings thus gradually increasing the average performance of the national building stock. Mandatory renovation/minimum performance requirements could be introduced progressively and target specific segments as a priority.

Question 11. In your opinion, should the EPBD introduce mandatory minimum energy performance standards to be applied in the EU, subject to specific conditions to be determined?

- (●) Yes
- ( ) No
- ( ) I don't know/ No opinion

Please explain your answer:

1000 character(s) maximum

MEPS can support a massive increase in the building renovation rate, which is essential for the EU to meet its climate targets.Apart of measures for information, labelling, financing, subsidising and incentivising energy efficiency, MEPS is a stronger approach essential to take up renovations quickly and monitor the climate performance of buildings. MEPS to be successful, efficient and not unduly burdensome need a comprehensive framework of support to address the barriers to renovation. MEPS design should vary according to local or national priorities, building stocks and targets, but based on a European holistic strategy. However, flexibility should be allowed to those Member States that already now have very low carbon emissions in their heating sector'. Moreover, the different starting points of the Member States, the characteristics of the heat market and challenges related to reducing the energy intensity of this sector should be taken into account.

Question 12. What type of minimum energy performance standards do you consider most appropriate?

- ( ) Building-level performance standards, focusing on the overall energy efficiency of the building (for example linked to an Energy Performance Certificates ('EPC') class or the energy codes, specific energy consumption, another carbon metric, etc.)

- (●) Building element-level performance standards, setting specific minimum levels of building elements (for the envelope and/or the technical building systems including heating and cooling)
- ( ) Minimum quality standards, including also other aspects beyond energy performance, such as thermal comfort - please specify in comment box
- ( ) Others - please specify in comment box
- ( ) I don't know / No opinion

Please explain your answer:

1500 character(s) maximum

The standards should be introduced gradually, allowing for the use of cost-efficient GHG mitigation options in a technology-open manner while supporting the switch to low-carbon and efficient solutions. The milestones in MEPS framework could differentiate between non-residential and residential buildings. This because MEPS for non-residential buildings can be more ambitious because these buildings have a higher potential to be early movers. MEPS should be accompanied by economic and non-economic support measures reaching these milestones.

Question 13. In your view, for which category of buildings should mandatory minimum energy performance standards be applied?

at most 2 choice(s)

- [x] All residential and non-residential buildings
- [ ] All residential buildings being sold and/or rented out
- [ ] All residential buildings
- [ ] A subset of residential buildings to be defined (please specify in comment box)
- [ ] All non-residential buildings
- [ ] All non-residential buildings being sold and/or rented out
- [ ] A subset of non-residential buildings to be defined (please specify in comment box)
- [ ] All public buildings (with a total floor area of more than 250 m2)
- [ ] Only to worst-performing buildings irrespective of their ownership and use profile
- [x] Other (please specify in comment box)
- [ ] I don't know / No opinion

* Other? Please specify:

500 character(s) maximum

For all residential and non-residential buildings. Especially for existing buildings, the premises of social compatibility, economic efficiency and attractive, technology-open funding are essential. When implementing minimum standards, solutions for tenant/landlord relationships should be offered.

Question 14. Do you think that mandatory minimum energy performance standards should be introduced:

- (●) Yes
- ( ) No, I don't believe that mandatory minimum standards are appropriate
- ( ) I don't know / No opinion

If yes,

- [x] Linked to specific moments in the life cycle of a building, for example a transaction (e.g. the sale, rental or lease of a building)
- [x] On the basis of a timetable for a staged approach to achieve specific energy performance levels
- [x] Other - please specify in the comment box

* Please specify:

500 character(s) maximum

There should be a complementary approach for MEPS introduction schemes, by taking into account different segments of buildings. Linking the MEPS to transactions may fit better residential buildings, while public and non-residential buildings may benefit from a staged approach based on milestones complementing the transactions. Relaying just on one of the two schemes risks of leaving behind certain typologies of buildings or owners.

Question 15. In your view, what is the most important element that could guarantee a successful roll-out of mandatory minimum energy performance standards?

- ( ) The availability of financial support to buildings owners
- ( ) The correct identification of the worst-performing buildings
- ( ) The presence of a stable legal framework
- ( ) The availability of adequate workforce capacity to do renovations
- ( ) The availability of emerging technologies facilitating rapid renovation works
- (●) Other - please specify in comment box
- ( ) I don't know / No opinion

* Please specify:

500 character(s) maximum

The availability of financial support to buildings owners and the correct identification of the worst-performing buildings are the most important ones. However the presence of a stable legal framework and the availability of adequate workforce capacity fo do renovations are also very relevant.

Public buildings

Question 16. In your view, which of the following regulatory measures should be envisaged to increase the rate and depth of renovation of public buildings in a sustainable manner?

- Introduction of more stringent minimum energy performance requirements for renovation of public buildings
- Introduction of minimum energy performance standards in public buildings, with an obligation to achieve progressively more ambitious levels
- Introduction of life cycle aspects in the design, construction and operation of refurbished public buildings (e.g. circular approaches like extension of service life, adaptability and flexibility, reuse and recycling of materials)
- Introduction of climate resilience aspects in the design and operation of new and refurbished public buildings
- Other - please specify in comment box
- I don’t know / No opinion

Electromobility

Question 17. The provisions on electromobility in Article 8 of the EPBD targeting the installation of recharging points in car parks adjacent to buildings were recently introduced. With the strengthened climate ambition and the increased incentives towards the uptake of electric cars but also with the strong increase in (electric) bike /cargo-bike use, do you think there is a need to strengthen the requirements?

	Yes	No	I don't know/ No opinion
For new residential buildings	●	○	○
For refurbished buildings	●	○	○
For new non-residential buildings	●	○	○
For refurbished non-residential buildings	●	○	○

Question 18. In your view, what kind of requirement would be needed?

	Yes	No	I don't know/ No opinion
The installation of recharging points to support smart charging, allowing to monitor, control and optimise energy usage when recharging electric vehicles	◉	○	○
The inclusion of provisions for recharging points for vehicles other than cars (e. g. e-bikes)	◉	○	○
To give owners of an apartment in multi-dwelling buildings the right to install a recharging point for their parking spot in the shared parking garage (right to plug)	◉	○	○

Other measures? Please specify:

500 character(s) maximum

Citizens should have a right to plug but current procedures for owners and tenants for installing EV charging infrastructure in buildings are insufficient. Installing a charging point in multi-dwelling residential buildings should be as simple as any other utility service. The EPBD needs to support the implementation of smart chargingThe installation of at least 1 smart charging station for every 10 parking spaces should be required for all new and renovated building.

Question 19. Are you aware of administrative barriers preventing the deployment of charging points in buildings in your country?

- ◉ Yes
- ○ No

* If yes, please elaborate:

1000 character(s) maximum

In Portugal, a request to install an EV charging points in a multi-dwelling residential building can take up to 120 days to be approved as it depends from condominium administration body approvals. Nonetheless, the request may be denied if a shared-use charging point is already available in that parking area, or made available within 90 days from the request.
In Germany, the Building Electric Mobility Infrastructure Act (implementing Art. 8 EPBD) provides a good basis but could consider even more flexibility in the implementation. Especially by opening up the possibility to bundle the power of charging points, e.g. to install 11 kW charging points at one or more locations instead of five. It should also be possible to fulfil any obligations by setting up fewer and more powerful charging points with a filling station-like function.
Rules that simplify the principles of charging (for example up to 7,2 kW) for cooperatives / communities and individuals could also be considered.

Part B. Information provision and energy performance certificates

Energy performance certificates (EPCs)

Energy performance certificates (EPCs) is an instrument aimed at informing building owners, tenants and users about the cost of heating and cooling, savings that investments would bring and offer benchmarks to compare similar buildings. EPCs are also needed to link preferential financing conditions to quality renovations. Under the existing EU regulatory framework, EPCs are compulsory for buildings being built, sold or rented and the energy class of the EPC must also be shown in advertisement media. They are also compulsory for buildings over 250 m2 occupied by a public authority and frequently visited by the public. EPCs can also be used to plan policy or to monitor the performance of measures when these are implemented. However, the coverage of such certificates strongly differs across Member States.

Question 20. Do you agree that the framework for Energy Performance Certificates should be updated and their quality improved?

- (●) Yes
- ( ) No, it's not necessary
- ( ) Other - please specify in the comment box
- ( ) I don't know / No opinion

Question 21. Is harmonization of EPCs needed to accelerate the increase of building performance and how can it be achieved?

- ( ) Yes, it is needed and can be achieved by introducing a common template
- (●) Yes, it is needed and can be achieved by other means - please specify in comment box
- ( ) Yes, it is needed but some national specification should be retained - please specify in comment box
- ( ) No, harmonisation is not needed
- ( ) I don't know / No opinion

* Other means? Please specify:

1500 character(s) maximum

Enhance the energy and climate performance of all buildings (public and private, non-residential and residential) is key to reduce their carbon-footprint towards a “near-zero energy and emission building” target. EPC is one of the EU’s main tools to facilitate the long-term decarbonisation of the building stock, however, to exploit its full potential, is needed to overcome some hurdles, such as inadequate data gathering, lack of compliance, low reliability, different definitions and calculation methods. EPCs must become more transparent and reliable in order to build trust. The current EPCs have not been tailored to the needs of the end-user. Displaying only the energy performance of the building brings limited benefits to most people, especially when the content is conveyed in technical terms. New EPC indicators could enhance the usefulness and attractiveness of the instrument, i.e. translating energy savings in euros. A dynamic EPC database is also needed in order to make links to 3rd parties (such as financial institutions, real estate agencies and contractors) and by doing so enable better renovation packages for end-users. A well-functioning EPC regime, accompanied by an EPC database, provides a ready-to-use source of information on the building stock. A more harmonised European calculation methodology for the EPC could increase comparability between regions, confidence and market uptake. A common standard or guidance document would create synergies across the EU.

Please explain your choice:

500 character(s) maximum

Question 22. How would you rate the following elements in order to improve the quality and impact of EPC requirements?

0 – No opinion
1 – Not important
2 – Of little importance
3 – Moderately important
4 – Important
5 – Very important

	0	1	2	3	4	5
Improve training for independent experts	○	○	○	◉	○	○
Develop professional qualification schemes or labels for installers of technical buildings systems	○	○	○	○	◉	○
Improve quality control mechanisms	○	○	○	○	◉	○
Include further information on estimated costs, energy savings or cost savings	○	○	○	○	◉	○
Include information on non-financial benefits such as increased comfort and climate resilience	○	○	○	○	◉	○
Tailor the recommendations towards deep renovations	○	○	○	○	◉	○

Develop an accessible EPC database with further information on the EPC, explanation of the different terms, benchmarks and comparison with similar buildings	○	○	○	◉	○	○
Increase the number of mandatory indicators to include: greenhouse gas emissions, generation of renewable energy, breakdown of different energy uses (e.g. heating, ventilation, lighting, etc.) or type of systems installed	○	○	○	○	◉	○
Increase the interoperability with other tools such as digital building logbooks, SRIs and renovation passports.	○	○	○	◉	○	○

Comment:

500 character(s) maximum

Question 23. Which elements are the most important to ensure compliance with EPC requirements?

at most 3 choice(s)

- ☐ Provision of detailed guidelines for EPC (including use of visual identity, common logo, recommended indicators)
- ☐ More stringent penalties in case of non-compliance, for instance in relation to the advertisement of sales or rent of buildings
- ☑ Extend liability to all the market actors involved in the selling/renting of properties
- ☑ Making EPCs mandatory to access any financial incentive targeting buildings renovations
- ☑ Accessible EPC database with benchmarks allowing comparison with similar buildings
- ☐ Introduce information flow and cross-checks between EPC databases and other databases containing information on buildings or products (e.g. national building registry or cadastre, energy labelling database for products, digital building logbooks, other national statistics, etc.)
- ☐ Other measures - please specify in comment box

Smartness of buildings and wider modernisation

Question 24. The objective of the Building Renovation Passport (BRP) is to provide a long-term, step-by-step renovation roadmap for a specific building based on quality criteria, following an energy audit, and outlining relevant measures and renovations that could improve the energy performance and the quality of the

building. The BRP schemes and initiatives in the EU are diverse and most of them have not reached their full potential, while some are still at the research phase. Which measures do you think could best support the uptake of a building renovation passport?

at most 3 choice(s)

- [x] Guidelines and best practice exchange on how the BRP can support the objectives of the Long Term Renovation Strategy
- [x] National/regional communication campaigns to increase awareness of the BRPs
- [ ] Training of energy experts
- [x] Making funds, such as the European Energy Efficiency Fund or ELENA, available to the Member States for BRP development and implementation
- [ ] Guidelines on how to support and enable banks to offer a favourable interest rate on loans/mortgages which are linked to a BRP
- [ ] Legal requirement to be introduced in the EPBD review for the Commission to develop a common template for BRPs
- [ ] Legal requirement to be introduced in the EPBD review for the Commission to develop a voluntary BRP scheme
- [ ] Legal requirement to be introduced in the EPBD review stating that BRP becomes mandatory for certain building types (replicating the EPC regulations, buildings for sale, etc.) after 2030.
- [ ] No measure is necessary
- [ ] Other - please specify in comment box
- [ ] I don’t know / No opinion

Question 25. The Commission has created a uniform scheme for Smart Readiness Indicators in the EU. The scheme is currently voluntary, and has the potential to promote the digitalisation of buildings and the role that buildings can play in smart sector integration.

What would you consider to be the best ways in which the Smart Readiness Indicator could support the role of buildings in smart sector integration?

- ( ) Continue with the current framework and focus on its implementation on a voluntary basis
- ( ) Introduce SRI as mandatory requirement for non-residential buildings
- ( ) Introduce SRI as mandatory requirement for all new buildings

- ○ Introduce SRI as mandatory requirement for all buildings
- ◉ Support the development of links between the SRI and other schemes (e.g. EPCs, building renovation passports, building logbooks, etc.)
- ○ Other - please specify in comment box
- ○ I don’t know / No opinion

Question 26. Do you think that the EPBD can contribute in making a wider range of building-related data on the energy performance of a building and its related construction and renovation works, across its life cycle, available and accessible? (note: building related data can come from a variety of sources: SRI, logbook and EPCs, Level(s), grant schemes, building permits, digital models)

- ◉ Yes
- ○ No
- ○ No opinion

Please explain your answer:

1000 character(s) maximum

/

Part 3. Enabling more accessible and affordable financing for building renovation

Question 27. The Renovation Wave Communication identify the need of sensible additional investments in building renovation in order to double the yearly renovation rate across Europe, decarbonise the building stock and achieve 2030 energy efficiency targets. Public financing alone will not be enough to achieve these objectives; it will be seminal to enable more accessible and affordable private financing options for building renovation. How would you rate the following possible forms of support to renovations?

0 – No opinion
1 – Not important
2 – Of little importance
3 – Moderately important
4 – Important
5 – Very important

	0	1	2	3	4	5
Public guarantee for commercial banks to offer low-interest loans for renovation of worst performing buildings	○	○	○	○	◉	○
Direct grants support to low-income citizens living on worst performing buildings	○	○	○	○	○	◉
ESCOs financing of low-interest loans payback through on-bill recovery	○	○	○	○	◉	○
Tax incentives during a period of time to provide additional economic support	○	○	○	○	○	◉
One stop shops for all types of renovation advice	○	○	○	○	○	◉
Support the development of energy efficiency mortgages and other innovative financing options that will enable private financing institutions to offer low-interest loans based on the improvements of energy performance of buildings or on building renovation passports	○	○	○	○	◉	○
Technical assistance facilities supporting the development of building renovation project for the building stock of local and regional authorities	○	○	○	○	◉	○

Other kind of support? Please specify:

500 character(s) maximum

/

Question 28. Deep renovations do not always result in a rapid return on investment. In your opinion, how public financial incentives can be used to stimulate deeper renovations across the EU?

1000 character(s) maximum

To encourage investment in EE technologies with higher paybacks, it is essential: [1] regulation that established minimum efficiency standards for equipment and insulations; [2] information, that enable citizens and companies to make the most appropriate decisions; [3] regulatory stability; [4] review of energy taxation, to reflect an uniform carbon price across all fuels and to remove taxes from cleaner energy sources (such as financing renewables throught the electricity tariff); (5) Remove restrictions in State Aid Law. Support for renovation measures should not be classified as competition relevant. Financial benefits from renovation measures should be more easily transferable to subsequent users (buyers, inheritors), e.g. by making them more related to the building and not to the user'. Energy performance contracting combined with an ambitious objective of GHG emission reduction implemented by the public sector could be used to further support deeper renovation in Europe.

Question 29. Do you think that funding support to renovations should be linked to the depth of renovation?

○ Yes

- ○ No, it is not necessary
- ◉ I don’t know / No opinion

Question 30. In your view, which of the following measures would help to further support the renovation of public buildings?

- ☑ Technical assistance for public authorities (national, regional, local) to design and implement comprehensive renovation programmes (ELENA model), including linkages other related climate-resilience policies in urban and rural areas
- ☑ Enhanced deployment and capacity building for energy performance contracting in the public sector (including accounting rules)
- ☑ Financial incentives to support companies providing energy performance contracting
- ☑ Public-private partnerships to inform and assist efforts of public authorities for building renovation and ease access to financing
- ☑ Framework contracts at national, regional or local level with the specific objective of renovating public buildings
- ☐ Other measures - please specify in comment box
- ☐ I don't know/ No opinion

Question 31. As part of their Long-Term Renovation Strategies (LTRS), Member States must outline relevant national measures to reduce energy poverty. The Renovation Wave Communication indicates a number of measures to tackle energy poverty and renovate worst-performing buildings, including social housing. It also states that vulnerable households must be shielded from rent increases that may follow renovations. What do you think are the most important policy areas addressing energy poverty to be further reinforced?

at most 3 choice(s)

- ☑ Targeted financial support for lower and middle income households
- ☑ Minimum energy performance standards coupled with financing that limits the monthly net expenditure of the inhabitants
- ☐ Other additional legislative measures (please specify in the comment box)
- ☐ The Affordable Housing Initiative
- ☐ The Energy Poverty Observatory
- ☑ Other measures (please specify in the comment box)
- ☐ I don’t know / No opinion

Other measures? Please specify:

500 character(s) maximum

Additional measures to support low income households can be addressed via national social policy measures.

Further comments

Question 32. Do you have any further comments on policy aspects relevant for the decarbonisation of building which are not covered above?

1000 character(s) maximum

Energy communities should be clearly mentioned and developed in the EBPD action, because of their high potential to achieve the objectives proposed, by being able to integrate the production of renewable electric and thermal energy, the "intelligence" in load management and in particular with regard to electric mobility, and the implementation of measures involving the building in a more efficient way for housing blocks, not to mention the fact that those consumers are more aware on these topics and are more likely to adopt more efficient behaviors.
The regulations of EED, EPBD, RED, ETS, Energy Taxation and the Governance Regulation should be closely coordinated and not contradict each other. As a result, no duplicate or contradictory regulations should be implemented. The implementation deadlines of the regulations should also be synchronised in a logical way. In the long term, the EPBD should use CO2 as a measure for the decarbonisation of the building sector.

Contact

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Eurelectric pursues in all its activities the application of the following sustainable development values:

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- Commitment, innovation, pro-activeness

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