

EFCC's Feedback on the revision of the Energy Performance of Buildings Directive 2010/31/E (EPBD)

The European Federation for Construction Chemicals (EFCC) represents European construction chemicals companies and national member federations, representing raw materials producers and formulators of finished products, including SMEs, across the European Union. EFCC welcomes the opportunity to participate in the public consultation on the Revision of the Energy Performance of Buildings Directive.

PART A. PLANNING AND POLICY INSTRUMENTS

- **Decarbonisation of buildings**

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. EFCC does not support defining such a concept within the EPBD, as it would add complexity without clear benefits and complicate the political dialogue. This might endanger the achievement of short-term policy goals related to energy efficiency.

EFCC would like to express their support for the modification of EPBD provisions of the Long-Term Renovation Strategies (LTRS) and would like to emphasize that ensuring a high quality of these strategies submitted by Member States (MSs) is essential.

EFCC supports strengthening the monitoring of the objectives identified by MSs in their LTRS through a specific monitoring tool to be developed by the Commission. Moreover, developing a common template and requesting specific data and indicators, will make the information provided by Member States more comparable. EFCC also supports the idea of requesting more data, especially on GHG emission effects, which will allow assessment of the contribution to the EU climate policy targets.

To further support district and city authorities to increase the energy efficiency of public buildings a combined strategy could be defined that includes requirements to assess building performance, requirements to improve worst-performing buildings, financial incentives, a campaign informing local authorities about their duties and articulate the instruments to meet these.

- **Resource efficiency and climate resilience in buildings renovation**

EFCC would like to express their concern expanding the scope of the EPBD to the whole life cycle as this would lead to undesired complexity, while Level(s) could be the reference methodology. Expanding the scope would likely complicate the political discussion and could delay the initiative and therefore endanger the achievement of the short term policy goals related to energy efficiency.

Environmental Product Declarations (provided in a voluntary basis) offer the required product related information. The Construction Products Regulation should regulate and harmonise these at EU level. Regarding building assessment, the Level(s) EU methodology based on EN 15978 is available to calculate life cycle emissions and is being implemented by Member States. Life cycle emissions assessed through EN 15978, extend beyond the scope of the EPBD.

The EPBD should be **the** reference approach for assessing the energy performance of buildings and complement other policy instruments. Every policy or initiative should have

a clear scope and complement other policies to avoid conflicts and gaps.

- **Nearly Zero-Energy Buildings (NZEBS)**

The current definition of NZEBs: '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.' is ambitious enough. Achieve this goal first and review later.

Both minimum thresholds for primary energy use and renewable energy sources' share in the building's operation should be introduced in the EPBD for different climate zones.

- **Mandatory Minimum Energy Performance Standards ('MEPS')**

EFCC supports the idea of introducing mandatory minimum energy performance standards by EPBD to be applied in the EU, subject to specific conditions. A detailed planning describing the requirements, benefits for their application, as well as the time frame, should be developed and revised in a transparent way. Investors and owners need information and certainty in particular regarding the applicable rules.

In EFCC's view building-level performance standards, focusing on the overall energy efficiency of the building are the most appropriate minimum energy performance standard. Minimum energy performance standards and energy performance certificates are complementary approaches and have a positive effect on occupant and owner awareness. Reinforcing both instruments will have a positive effect.

EFCC supports the definition of mandatory minimum energy performance standards that are applied to all residential and non-residential buildings and link to specific moments in the life cycle of a building, for example a transaction. EFCC believes that these standards should be defined on the basis of a timetable for a staged approach to achieve specific energy performance levels.

EFCC believes that the presence of a stable legal framework is the most important element that could guarantee a successful roll-out of such mandatory minimum energy performance standards.

PART B. INFORMATION PROVISION AND ENERGY PERFORMANCE CERTIFICATES

- **Energy Performance Certificates (EPCs)**

EFCC strongly supports the idea of updating the framework for Energy Performance Certificates and improving their quality. EFCC believes that harmonisation of EPCs is required to accelerate the increase of building performance, which can be achieved by introducing a common template.

A harmonised, digital approach linked to building logbooks can improve the current situation. Such an approach needs to be developed according to the BIM principles for the development of data templates. This is the only way to transform it into a useful tool. Otherwise, the required inter-operability with other tools (building logbooks, consumer apps, etc.) will not be achieved. In addition, the assessment must be carried out on-site by certified professionals using the relevant standards.

In order to improve the quality and the impact of EPCs, EFCC considers the following elements of the highest importance:

- i. improvement of training of independent experts
- ii. improvement of quality control mechanisms
- iii. including further information on estimated costs, energy or cost savings, and information on non-financial benefits
- iv. tailoring the recommendations towards deep renovations
- v. increasing the inter-operability with other tools such as digital building logbooks, SRIs and renovation passports.

EFCC believes that more stringent penalties in case of non-compliance as well as making EPCs mandatory to access any financial incentive targeting buildings renovations, must play an important role in ensuring compliance with EPC requirements.

- **Smartness of buildings and wider modernisation**

EFCC strongly supports the objective of the Building Renovation Passport (BRP) 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.

Concerning the use of confidential data and the diversity of the sources of these data, EFCC would like to emphasise the difficulty of using or disseminating these data. Nevertheless, digital harmonisation, using standardised data, has the potential to improve the current situation. Information could be classified at different levels: e.g. accessible to the public, and/or the municipality and/or the owner.

PART C. ENABLING MORE ACCESSIBLE AND AFFORDABLE FINANCING

EFCC supports the identification of sensible additional investment in building renovation. In particular, EFCC supports the following forms to support additional investment:

- i. public guarantees for commercial banks to offer low-interest loans for the renovation of the worst-performing buildings
- ii. direct grants to support low-income citizens living in worst-performing buildings
- iii. one-stop shops for all types of renovation advice.

Concerning deep renovations and their low return on investment, EFCC would like to express their support for the co-financing option. This financing strategy has been shown to have a multiplier effect. However, the return on investment is linked to the deepness of the renovation. Therefore, EFCC believes that funding support to renovations should be linked to the depth of renovation. A combined approach is necessary because 60% energy savings might not be too ambitious for the worst-performing buildings, but might be difficult to achieve for the average building stock in certain climatic conditions.

EFCC believes that Technical Assistance to 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 would help to further support the renovation of public buildings.

EFCC recognises the need for further reinforcement in policy areas addressing energy poverty by:

- i. providing targeted financial support for lower and middle income households,
- ii. defining minimum energy performance standards coupled with financing that limits the monthly net expenditure of the inhabitants, and
- iii. EPC and BRP subsidies in combination with efficiency measures recommendations and financial support.

PART D. FURTHER COMMENTS

The European Federation for Construction Chemicals strongly recommends regulatory consistency. The EPB Directive should focus on development of improving the energy performance of the existing building stock, setting ambitious targets for new buildings through NZEB standards and complement other regulations or regulatory initiatives related to the Built Environment avoiding both gaps and overlaps.

On the potential extension of the scope to address embodied impacts, while the European methodology Level(s) is available, its regulatory implementation would require broad consensus among Member States. Opening this discussion might endanger a necessary, fast and efficient Revision of the EPBD.

EFCC believes that a critical challenge for the Revision of the EPBD is to define an efficient system that includes EPC, BRP, MEPS (to be implemented by Member States). Digitalisation through product data templates could be a game changer, if developed under a transparent and inclusive process.

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