

Public Consultation on the Evaluation of the Energy Performance of Buildings Directive

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PUBLIC CONSULTATION ON THE EVALUATION OF THE ENERGY PERFORMANCE OF BUILDINGS DIRECTIVE

INFORMATION ABOUT YOU

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- Individual
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European Biomass Association (AEBIOM)

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- F. Ensuring new highly efficient buildings using a higher share of renewable energy
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A. Overall Assessment

Currently, about 35% of the EU's buildings are above 50 years old. Buildings are responsible for 40% of energy consumption and 36% of CO₂ emissions in the EU, and consume, on average, about 25 litres of heating oil per square metre per year. Some buildings even require up to 60 litres.

The Energy Performance of Buildings Directive (EPBD) aims to:

1. improve the energy performance of buildings in the EU, taking into account outdoor climatic and local conditions, as well as indoor environment requirements and cost-effectiveness.
2. require Member States to set energy performance standards for buildings,
3. require Member States to issue buildings with energy performance certificates, and
4. require Member States to ensure that, by the end of 2020, all new buildings are 'nearly zero energy' buildings

It sets out concrete ways of achieving the great untapped potential for energy savings in buildings and reducing the large differences in results that exist in energy saving outcomes between Member States.

1. How successful has the EPBD been in achieving its goals?

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EPBD has been an important tool to raise awareness in member states. It has had an effect that thinking of buildings has become more whole-oriented (ie. the calculation of life cycle energy balance of a building and hybrid systems has been debated and studied). However, it seems that the implementation of the EPBD into national legislation varies greatly among Member States. Therefore, before envisaging new and more ambitious measures for the EPBD, the focus should be first put on a more ambitious implementation of the EPBD provisions in all Member States that should, when transposing into national laws, establish well defined objectives, accompanied by strong measures and targets when necessary. The European Commission should give further guidance to correct implementation through effective monitoring and reporting.

2. Has it helped to improve energy efficiency in buildings?

2500 character(s) maximum

3. Has it helped to increase renovation (more than 25% of the surface of the building envelope) rates?

2500 character(s) maximum

4. In your view, has the EPBD sufficiently contributed to accelerating investment in improving the energy performance of the EU's building stock? Why/Why not?

2500 character(s) maximum

5. Overall, do you think that the EPBD is contributing to cost-effective improvements in energy performance? Why/Why not?

2500 character(s) maximum

6. Do you think that the aim of ensuring the same level of ambition across the EU in setting minimum energy performance requirements within the EPBD has been met? Why/Why not?

2500 character(s) maximum

7. Has the EPBD effectively addressed the challenges of existing buildings' energy performance?

2500 character(s) maximum

8. Has the EPBD set effective energy performance standards for new buildings?

2500 character(s) maximum

9. Will the 'nearly zero-energy buildings' targets be met? Why/Why not??

2500 character(s) maximum

10. How successful has the inclusion of Energy Performance Certificates in the EPBD been? Have the certificates contributed to improvements in energy performance of buildings

2500 character(s) maximum

11. What has worked well in the EPBD? What needs to be improved?

2500 character(s) maximum

12. Is the EPBD helping to contribute to the goals of EU climate and energy policy (Reduce greenhouse gas emissions by at least 40%; increasing the share of renewable energy to at least 27%; increasing energy efficiency by at least 27%; reform of the EU emission trading system)?

2500 character(s) maximum

13. Is it in line with subsidiarity? What should continue to be tackled at EU level and what could be achieved better at national level?

2500 character(s) maximum

14. Are the objectives of the EPBD delivered efficiently?

2500 character(s) maximum

15. Has the EPBD created any unnecessary administrative burdens? If so, please provide examples

2500 character(s) maximum

16. Has the EPBD created any unnecessary regulatory burdens? If so, please provide examples

2500 character(s) maximum

B. Facilitating enforcement and compliance

Compliance is recognised as being of critical importance in achieving the full energy efficiency and carbon savings potential of buildings. Strong local and regional verification of compliance with national building codes is required in order to reassure consumers of the quality of buildings.

The 2010 recast EPBD introduced targets for Near Zero-Energy Buildings (NZEBS) and more ambitious minimum energy performance requirements for new buildings. The EPBD defines NZEBs as a building that has a very high energy performance as determined in accordance to Annex I of the directive. The nearly zero or very low amount of energy required should be covered to a very significant extent by energy from renewable sources, including energy from renewable sources produced on-site or nearby. The EPBD sets the target for Member States to ensure that by 31 December 2020, all new buildings are nearly zero-energy buildings, and after 31 December 2018, new buildings occupied and owned by public authorities are nearly zero-energy buildings.

The EPBD also considerably reinforced the provisions for existing buildings, broadening the scope to all existing buildings (removing the 1000 m² threshold). It set and applied minimum energy performance requirements for the renovation of parts of the building envelope (roof, walls, etc.) with a view to achieving cost-optimal levels. It also set and applied minimum energy performance requirements for technical building systems (large ventilation systems, air conditioning, heating, domestic hot water system or combination of these) whenever they are installed, replaced or upgraded. It applied minimum energy performance requirements to all types of building works. The EPBD introduced a benchmarking system (the 'cost-optimal methodology' which calculates the energy performance level which leads to the lowest cost during the estimates economic lifecycle) to improve the level of ambition of the energy efficiency requirements contained in national or regional building codes while ensuring that these obtain the best value for money and that they are regularly reviewed.

A key aspect to be examined as part of the EPBD evaluation is how proper enforcement of the energy efficiency requirements in regional and national building codes is ensured.

17. Is compliance with the provisions of the EPBD adequate?

2500 character(s) maximum

It seems that the implementation of EPBD provisions into national legislation varies greatly among Member States. EPBD provisions seem in line with the energy efficiency objectives to reach but implementation at national level is lacking. Therefore, before envisaging new and more ambitious measures for the EPBD, the focus should be first put on a more ambitious implementation of the EPBD provisions in all Member States that should, when transposing into national laws, establish well defined objectives, accompanied by strong measures and targets when necessary. The European Commission should give further guidance to correct implementation through effective monitoring and reporting.

18. Is the definition of NZEBs in the EPBD sufficiently clear?

2500 character(s) maximum

19. Is the NZEB target in the EPBD sufficiently clear to be met?

2500 character(s) maximum

20. If not, what, in your view, are the missing factors that would ensure compliance with:

a. Minimum energy performance requirements in new buildings?

2500 character(s) maximum

b. Minimum energy performance in major renovations of existing buildings?

2500 character(s) maximum

c. Minimum energy performance for the replacing/retrofitting parts of the building envelope (roof, wall, window, etc.) and replacing/upgrading/installing technical building systems (heating, hot water, cooling, etc.)?

2500 character(s) maximum

d. Minimum renewable energy requirements to meet the NZEB target by 2020?

2500 character(s) maximum

e. Certification of the energy performance of buildings, including tailor-made recommendations for the improvement of the energy performance of buildings?

2500 character(s) maximum

f. Regular inspections of heating and air conditioning systems?

2500 character(s) maximum

21. Do you think the cost-optimum methodology gives sufficient evidence regarding the actual cost of renovating buildings on top of the additional cost for Near Zero-Energy Buildings?

2500 character(s) maximum

22. Are there any cost-effective measures for ensuring compliance at local and regional level that could be replicated and used to improve compliance on a larger scale?

2500 character(s) maximum

23. What do you think of the various ways of calculating building energy performance at national/regional level? Please include examples.

2500 character(s) maximum

24. What measures are missing that could simplify the implementation of building regulations to make sure that buildings meet the required high energy performance levels?

2500 character(s) maximum

C. Energy Performance Certificates (EPCs) and stimulating energy efficient renovation of the building stock

Building energy efficiency has been increasing at 1.4% per year. This relatively low rate is owed largely to low renovation rates. To reap the benefits of energy efficiency and the use of renewables in buildings, the biggest challenge is to accelerate and finance upfront investments and speed up the renovation rate of the existing stock to above 2% annually. The aim of EPCs is to transform the building sector by setting ambitious energy efficiency standards and incentivise investment in renovating buildings to improve their energy efficiency, and facilitate a single market in and the free circulation of highly specialised workers, solutions and technologies and investments in energy efficiency and renewables in buildings. These aims have been identified as drivers for investment in renovation. In addition, the Energy Efficiency Directive (2012/27/EU, 'the EED') required Member States to establish, by April 2014, a long-term strategy for mobilising investment in the renovation of the national building stock.

25. Are the available data on the national/regional building stock sufficient to give a clear picture of the energy performance of the EU's building stock, as well as the market uptake of energy efficiency technologies and the improvement of the energy performance of buildings in the EU?

2500 character(s) maximum

26. Are the long-term national renovation strategies adopted sufficient to stimulate the renovation of national building stock? What examples of best practice could be promoted across the EU and how?

2500 character(s) maximum

27. Have EPCs played a role in increasing the rate of renovation, the extent of renovation, or both? For instance, are EPC recommendations being defined as the most effective packages of measures to move the performance of buildings and/or their envelopes to higher energy classes?

2500 character(s) maximum

28. Is setting a minimum renovation target for Member States to undertake (e.g. each year; percentage of building stock) important and requires further attention in the context of meeting the goals of the EPBD?

2500 character(s) maximum

29. Are obligations or binding targets for renovation or any other mandatory measure (e.g. mandatory minimum thermal efficiency standards for rental properties) missing from the EPBD to ensure that the directive meets its goals? If, yes, what kind of obligations and targets?

2500 character(s) maximum

30. Are EPCs designed in a way that makes it easy to compare and harmonise them across EU Member States?

2500 character(s) maximum

31. Do you think that the 'staged deep renovation' concept is clear enough in the EPBD?

2500 character(s) maximum

32. Have EPCs raised awareness among building owners and tenants of cost-efficient ways of improving the energy performance of the buildings and, as a consequence, help to increase renovation rates across the EU?

2500 character(s) maximum

33. Should EPCs have been made mandatory for all buildings (a roofed construction having walls, for which energy is used to condition the indoor climate), independent of whether they are rented out or sold or not?

2500 character(s) maximum

D. Financing energy efficiency and renewable energy in buildings and creation of markets

The EU has been supporting the improvement of the energy performance of buildings for many years with a range of financial support programmes. As almost 90% of building floor space in the EU is privately owned and more than 40% of residential buildings date from before 1960, most financing has to come from private sources. The Energy Efficiency Financial Institution Group ([EEFIG](#)), an expert group set up by the European Commission and United Nations Environment Programme Finance Initiative, published their final report in February 2015. The report identified the need to engage with multiple stakeholder groups and scale up the use of several financial instruments as part of a clear and enforced 'carrot and stick' legislative framework. The group also made a strong case for combining public funds with private sector investment to address risks and achieve the scale of financing needed.

34. What are the main reasons for the insufficient take-up of the financing available for energy efficiency in buildings?

2500 character(s) maximum

35. What non-financing barriers are there that hinder investments, and how can they be overcome?

2500 character(s) maximum

36. What are the best financing tools the EU could offer to help citizens and Member States facilitate deep renovations?

2500 character(s) maximum

Direct grant aid, tax/VAT advantages, low interest loans, carbon tax... Most importantly, trust between banks and the building sector should be enhanced. The EU should play a greater role in guaranteeing the risk when money is loaned for building renovation. Management of banks' loans and mortgages should also be reviewed to ease mortgages for building renovation (as for car loans).

The Smart Financing for Smart Buildings initiative should also foster understanding of available EU funds at local level, where projects are being developed, and ease the administrative complexity linked to their use.

37. What role do current national subsidies for fossil fuels have in supporting energy efficient buildings?

2500 character(s) maximum

38. Have energy efficiency and renewable energy projects been combined to maximise their financing? How can the EU help?

2500 character(s) maximum

The fact that important synergies exist between energy efficiency and renewable supply when it comes to new buildings/refurbishment should be understood and highlighted. Renewable sources of energy like biomass are using efficient technologies that allow an increasingly efficient use of energy and therefore a decrease of the primary energy consumed. The efficiency of biomass boilers has greatly evolved throughout the years. All biomass boilers have now an efficiency level between 90 and 100% (Source: FJ-BLT Wieselburg; Bioenergy 2020+).

Technology innovation also allows decreasing energy consumption. Bioenergy installations have gone through important innovation development since the use of wood logs in open fire. Biomass installations have innovative functions such as piloting capacity or automatization of the burning process that are offering greater opportunities for improved energy efficiency.

Renewable supply and energy efficiency should go hand in hand as they allow reducing energy demand while decarbonizing energy supply. Financing should have a more holistic approach and combine both energy efficiency and renewable supply. The EU could help in supporting and ensuring that these synergies are taken into account in policy development and financing instruments.

When it comes to the cost-optimal solution between demand reduction and decarbonisation of supply, there is no one size fits all solution. An analysis should be done on a case by case basis to evaluate the best cost-optimal option in a given situation.

It is also worth highlighting that the cost-optimal option depends on market conditions. Current energy market conditions do not reflect a level-playing field (fossil fuels still heavily subsidized and their price regulated). In this context, the cost-optimal balance is difficult to evaluate as the existing distortions prevent calculating truly cost-optimal solutions.

39. How is investment in high-performing buildings stimulated and what is being undertaken to gradually phase out the worst performing buildings? Is it sufficient?

2500 character(s) maximum

40. What is being undertaken to solve the problem of 'split incentives' (between the owner and the tenant) that hampers deep renovations? Is it sufficient?

2500 character(s) maximum

41. Taking into account the experience and achievements to date, would

a) scaling-up of existing public funds alone be sufficient to meet the goals of the EPBD?

2500 character(s) maximum

b) aggregation of energy efficiency investments in buildings (e.g. enabled by standardisation of Energy Performance Contracts and clarification of regulatory and accounting issues) contribute to the achievement of EPBD goals

2500 character(s) maximum

E. Energy poverty and affordability of housing

Energy poverty affects living conditions and health. It has many causes, including a combination of low income and general poverty conditions, energy-inefficient homes and a housing tenure system that fails to encourage energy efficiency. For example, in Britain, 9,300 people died prematurely due to the cold during the [winters of 2012 and 2013](#).

The Energy Union has identified a combination of measures, mainly in the social field and within the competence of authorities at national, regional and local levels, as the only effective way of tackling energy poverty. When phasing out regulated prices, Member States need to propose a mechanism to protect vulnerable consumers, which could preferably be provided through the general welfare system. If provided through the energy market, it could be implemented through schemes such as a solidarity tariff or in the form of a discount on energy bills. The UK Government is preparing a programme under which doctors will be able to prescribe boilers, insulation and double glazing to fuel-poor patients suffering from health conditions exacerbated by cold homes.

42. What measures have been taken in the housing sector to address energy poverty?

2500 character(s) maximum

The two examples below, from Greece and Ireland, show that measures to address energy poverty exist in Member States but they do not have a holistic approach, combining economic benefits with environmental benefits. National energy poverty measures should go hand in hand with improvement of energy efficiency and renewable supply objectives to maximize the benefits of each measure.

- Greece: The basic measures taken so far to address energy poverty were the tax relief for low income families in the supply of heating oil or natural gas, or some small grants for the poorer social classes. It must be noted that no grants or tax relief has been eligible for the supply of biomass pellets or briquettes, even though there is tax relief for wood logs.

- Ireland: SEAI (Sustainable Energy Authority of Ireland) have run the Better Homes Scheme to grant aid for energy efficiency improvements in the home. This has been successful, however it grant aids to oil and gas boilers while not granting aid to biomass boilers.

The European Commission should encourage coherence within national energy policies and make sure all national energy policy measures are in line with the EU long term energy and climate objectives (EU 2050 Energy Roadmap 3 no regrets options - increased energy efficiency, development of renewable energy sources and smart infrastructures).

Coherence should also be fostered among the upcoming revisions of EPBD, EED and RES-D.

43. Should have further measures tackling energy poverty been included in the EPBD?

2500 character(s) maximum

44. Has tackling energy poverty been a requirements when constructing new buildings and renovating existing buildings in Member States?

2500 character(s) maximum

45. Are energy costs for heating and air conditioning being made available to interested buyers/tenants?

2500 character(s) maximum

There is still significant lack of information to the buyers-tenants about the real energy cost of heating and air-conditioning. Most cost-effective heating solutions depend on local conditions and needs. Local installers should therefore be better trained in order to propose the best economic solution according to the needs.

Biomass (pellet for individual use or woodchips for district heating) is, in several member states, cheaper than heating oil and natural gas. Promoting biomass at individual and district heating (DH) levels could be part of the solution to address the issue of energy poverty.

Information based on the same units should be available to simplify the comparison for end-consumers. This would, for example, show that electricity for direct heating is more expensive than any other energy carrier for heating.

Financial support through EU projects (ex: IEEP project FROnT) will help at the dissemination of energy costs and of the argument that biomass, among other RES solutions, can really feature as a reliable and attractive alternative to fossil fuels for building heating either on a stand-alone basis or on a complementary with other renewable energy sources basis.

National implementation of EPBD measures regarding information (article 20) should be enhanced.

F. Ensuring new highly efficient buildings using a higher share of renewable energy

Directive 2009/28/EC on the promotion of the use of energy from renewable sources ('the RES Directive') requires Member States to introduce in their building regulations and codes appropriate measures to increase the share of all types of renewable energy in buildings. One possible measure is Demand Response, which is a set of time-dependent programme activities and tariffs that seek to reduce electricity usage and provide control systems that encourage load shedding or load shifting at times when the electricity grid is near capacity or electricity prices are high. Demand Response helps to manage building electricity costs and to improve the reliability of the electricity grid.

By December 2014, Member States must, in their building regulations and codes, require the use of minimum levels of energy from renewable sources in new buildings and in existing buildings that are subject to major renovation. These provisions are complementary to the Near Zero-Energy Building (NZEB) requirements in the EPBD, which set clear obligations to reduce the primary energy consumption of buildings and recommend that the resulting nearly-zero or very low amount of energy needed should be covered to a very significant extent by energy from renewable sources. The Roadmap to a Resource-Efficient Europe (COM (2011) 571) proposed that buildings should be renovated and constructed with greater resource efficiency. While the Energy Efficiency Directive ('the EED') and the EPBD have an impact on building and construction activities they are not designed to provide an overall life-cycle approach. For newly-built NZEBs, from a life cycle perspective, the share of embedded energy is almost as great as the share of energy consumed in the building's use phase.

46. What are the best policies at district and city level to increase energy efficiency in buildings? Have specific targets on renewable energies in buildings been included?

2500 character(s) maximum

Two examples:

- Greece: Mandatory inspection of buildings' heating systems by certified engineers, especially for older installations (i.e. before 2000). Then, in order to improve the energy efficiency of buildings, various measures like off-grid solar photovoltaic (through net-metering scheme), biomass heating, building thermal insulation or small district heating networks can be adopted.

There is no specific target on renewable energy applications in buildings.

- Sweden: Some municipalities have set higher efficiency requirements than the international and national requirements and build according to the passive house standard and Nearly zero-energy buildings (NZEB). Several of the major property developers set higher standards than the national requirements and build according to Green Building and LEED standard.

In order to increase energy efficiency (EE) and RES in existing buildings, measures such as tax relief for the consumption of certain types of RES and investment support to a switch to RES heating system would be useful. More combined heat and power and district heating installations using biomass and waste fuels would also increase EE and RES. These types of measures could be taken by Member States under Article 7 of the EPBD.

When it comes to new buildings, building regulations (EPBD and EED) are key to ensuring that all new buildings are constructed according to the best energy efficient standards. A more ambitious national approach when it comes to the implementation of article 6 (1) of the EPBD should be fostered.

The European Commission should push for a correct and ambitious implementation of the EPBD articles 6 and 7.

47. On the basis of existing experience, are provisions on targets or specific requirements for new buildings, beyond the current NZEB targets, missing in the EPBD which could help achieve the energy efficiency 2030 target? If so, in what types of targets or requirements?

2500 character(s) maximum

48. Which building sectors have been addressed as a priority (public/private, residential/non-residential, industry, heating & cooling)?

2500 character(s) maximum

Examples:

- Greece: Greek Energy Policy put priorities on the private sector, mainly residential buildings for heating purposes.
- In Ireland the only current support schemes are for residential housing
- Sweden: Heating and cooling to public and private residential/non residential buildings.

National policies regarding buildings seem to give more attention to residential buildings. The approach taken in the EPBD not to differentiate residential and non-residential buildings is positive in order to enhance energy performance of all buildings. This approach should be supported in Member States legislation.

The exemplary role of public buildings is very important and measures linked to public buildings should be further implemented at national level.

This could be pushed at EU level by extending the exemplary role obligation in EED articles 5 and 6 to all public buildings (currently targeting only central government buildings).

49. Has having no EU set targets (indicative or binding) for the sustainable public procurement of NZEB buildings by public authorities affected the development of NZEBs?

2500 character(s) maximum

50. Has the EPBD framework improved the self-consumption of electricity in buildings?

2500 character(s) maximum

51. Does the EPBD address the issue of embedded energy? If so, in what way?

2500 character(s) maximum

52. Is demand response being stimulated at the individual building level and if so, how?

2500 character(s) maximum

53. What obligations are missing at EU level and national level, and at regional and local level to meet the goals of the EPBD?

2500 character(s) maximum

EPBD measures are not properly translated into clear objectives in most Member States. Indeed, obligations are rather missing at national level. Stricter national measures (i.e. quantified targets) for the obligation of buildings to improve their energy performance through energy efficiency and cover specific percentage of their energy consumption with RES will facilitate improvement in energy efficiencies and minimize the carbon footprint of the residential sector. That obligation should be even stricter for public buildings (i.e. schools, swimming pools, universities, etc.).

Implementation of EPBD measures relating to minimum requirements of RES in new buildings (articles 6(1)) and NZEB (article 9(1) and (2)) should be fostered so that they are clearly transposed into national legislation. Member States should be incentivized to have clearer definitions and objectives/targets in their national building obligations.

When it comes to buildings in general, the European Commission should focus on addressing the existing stock of buildings. This should be done by a better implementation of article 7 of the EPBD but most importantly through the revision of the EED and RES-D.

In fact, further and strengthened measures to address the existing stock of buildings should take place under the EED and RES-D, while the scope of the EPBD remains focused and addresses well new buildings and buildings going under major renovation.

G. Links between the EPBD and district and city levels, smart cities, and heating and cooling networks

The EPBD focuses on reducing energy demand and increasing energy efficiency and the share of renewable energy consumption in buildings (mainly on-site or nearby).

Alongside this, reducing transport needs, promoting active mobility, public transport and e-mobility in cities are important policy levers for achieving long-term European policy objectives in the field of climate change, energy and transport. Targeted use of information and communications technology will enable smart solutions that bring together different physical infrastructures and operational technologies. This would facilitate a better quality of services at lower cost, enabling better maintenance planning, for example, and approaches to investment that are focused on real needs.

When examining energy efficiency and renewable energy supply, the considerations at district and city level are different from those at building level. Heating and cooling networks can play an important role in improving the energy performance of buildings, but are also dependent on advance planning and adequate implementation (both at city and district level). Solutions for local renewables, co-generation and storage have in many cases proven to be more cost-effective at district level than at the level of individual buildings.

The EPBD is an instrument that could be used to address the differences at district and city level, and help Member States to develop a comprehensive strategy

54. What are the best policies at district and city level for increasing energy efficiency and use of renewable energy in buildings?

2500 character(s) maximum

55. Are there any separate (new) obligations set at city and district level missing from the EPBD which would help increase energy efficiency and use of renewable energy in buildings?

2500 character(s) maximum

56. How has the information exchange on smart technologies which contribute to compliance of the EPBD, been promoted in cities?

2500 character(s) maximum

57. Are smart meters and their functionalities contributing to meeting energy efficiency targets and the proper implementation of the EPBD? Are other targeted meters for heat, gas and water such as those for electric meters needed?

2500 character(s) maximum

58. Has the promotion of smart cities, smart buildings, sustainable transport solutions, smart mobility, and similar initiatives been linked with the EPBD and its aims? If so, how?

2500 character(s) maximum

59. Have obligations been set at a national/regional level in relation to buildings and district heating and cooling, or in relation to buildings and storage? Why/Why not?

2500 character(s) maximum

The use of RES in district heating should be promoted at EU level. Rather than introducing a new measure in the EPBD, a possible way could be by reinforcing article 14 of the Energy Efficiency Directive (Promotion of efficiency in heating and cooling) and setting minimum requirements at national/regional level for the use of RES in district heating and non-industrial CHP.

60. What incentives are missing, that would help promote efficient district heating and cooling or meeting the goals of the EPBD?

2500 character(s) maximum

The vast majority of district heating (DH) is supplied by fossil fuels. Minimum requirements of renewables should be established for existing DH systems, notably those under refurbishment /upgrading. This could be done by reinforcing article 14 of the Energy Efficiency Directive (Promotion of efficiency in heating and cooling). Also, facilitation of local micro grid initiatives should be reinforced.

61. Have cost-optimal policies been devised that improve the performance of buildings so that they use less heating and cooling, while ensuring a decarbonised energy supply?

2500 character(s) maximum

62. Does the EPBD and its definition of NZEB reflect the requirements that could derive from the energy systems of nearly zero-emissions districts and cities?

2500 character(s) maximum

H. Awareness, information and building data

Public information and awareness play a key role in improving energy efficiency in privately-owned buildings. There is a need for clear and accessible information for citizens, professionals and authorities to enable them to evaluate the energy performance of buildings. If this information is provided in similar formats it would make it easier to compare energy performance and, in particular, help identify best practice solutions, as almost 90% of building floor space in the EU is privately owned (and over 40% of residential buildings were built before 1960). The following questions focus on your experience of the information provided and your suggestions for improving the information flow.

63. What do you think of the quantity and quality of information on the importance of energy efficiency provided to consumers by:

1. the European Commission?

2500 character(s) maximum

EPBD has been an important tool to raise awareness in member states. It has had an effect that thinking of buildings has become more whole-oriented (ie. the calculation of life cycle energy balance of a building and hybrid systems has been debated and studied). The quantity and quality of information from EU is good but dissemination should not only target MS but also different level (region, local, cities, etc) and all relevant stakeholders. The European Commission should give further guidance for correct implementation of EPBD article 20.

The European Commission could provide Member States with a sort of "energy for dummies" guide explain basics about energy such as the amount of energy consumed by our appliances (kwh) or the fuel quantity and price needed to attain certain level of temperature in a house, ... It should also list the possible solutions to decrease energy consumption and carbon footprint.

2. national authorities?

2500 character(s) maximum

3. regional authorities?

2500 character(s) maximum

This level is very important as it touches a wide variety of consumers, especially those in rural areas. EPBD should have a greater focus on implementation at regional/local levels.

4. local authorities?

2500 character(s) maximum

This level is very important as it touches a wide variety of consumers, especially those in rural areas. EPBD should have a greater focus on implementation at regional/local levels.

5. local companies?

2500 character(s) maximum

64. Has the directive promoted information on opportunities for consumer-friendly smart meters and interoperable energy efficient appliances?

2500 character(s) maximum

65. What relevant building data has been collected at EU and Member State level, and city and district level? Who has access to this data?

2500 character(s) maximum

66. How can data on the energy performance of a building and its related renovation work, across its life cycle, best be managed and made available?

2500 character(s) maximum

67. Has building data harmonisation been achieved?

2500 character(s) maximum

68. Is there a need for a central EU database of EPCs and qualified experts?

2500 character(s) maximum

I. Sustainability, competitiveness and skills in the construction sector

The construction sector plays an important role in the European economy, generating almost 10% of GDP and providing 20 million jobs, mainly in micro- and small businesses. Designers, architects, builders, inspectors and certifiers, financiers, and national and regional supervisory authorities need to have the necessary skills and qualifications to ensure buildings are built effectively and using renewable energies. The sector is still largely craft-based, and there is huge scope for efficiency gains and more user-friendly retrofitting services as part of more industrial approaches, and through financial/planning/construction/maintenance package solutions based on strategic partnerships between SMEs and financing providers.

Through the EU's BUILD UP Skills initiative, between 2011 and 2013, energy efficiency skills needs and gaps for blue collar workers in the construction sector were identified in 30 countries (EU, Norway and the Former Yugoslav Republic of Macedonia). Each of these countries has produced a detailed status quo analysis with the participation of all main public and private stakeholders. From 2013 the BUILD UP Skills initiative has focused on the implementation of the national status quo analysis by setting up national training and qualification programmes for blue collar workers. These programmes have been put in place in 21 EU countries. With the launch of Horizon 2020, a new topic (EE4) on construction skills is now targeting training needs for both blue and white collar workers. Five projects focusing on skills in the construction sector will run until 2018.

The competitiveness of construction companies is an important issue, not only for growth and employment, but also to ensure the sustainability of the sector. The sector could contribute significantly to job creation by increasing its activity in promising areas such as the renovation of buildings. Construction and use of buildings in the EU account for about half of all extracted materials and energy consumption. 5—10% of total energy consumption across the EU is related to the production of construction products. The goal of the European Commission is to help the sector become more competitive, resource-efficient and sustainable. The EPBD is an instrument that could help work towards this goal.

69. How does the construction sector cost-effectively demonstrate and check compliance with the EPBD while also upgrading the skill and knowledge of tradespeople and professionals?

2500 character(s) maximum

70. Would it have been useful to extend Eurocodes to include energy performance in buildings and other relevant aspects? If so, why?

2500 character(s) maximum

71. Are energy, materials, waste and water use addressed in the EPBD?

2500 character(s) maximum

J. Buildings systems requirements

The EPBD requires Member States to set minimum energy performance requirements for technical building systems (means technical equipment for the heating, cooling, ventilation, hot water, and lightning or for a combination thereof, of a building or building unit) in existing buildings. National provisions should not target specific products only (e.g. boilers) but should instead address building systems while also taking into consideration the building as a whole. Whilst the [Ecodesign Directive](#) governs the placing on the market of individual products, the EPBD sets requirements for their energy-efficient performance as part of the technical systems serving a building. The EPBD also requires regular inspections of heating and air conditioning systems. While the Directive does not specify what would be regarded as a 'regular inspection', it is the view of the European Commission services that inspections carried out at least every 7–8 years would be considered acceptable, whereas anything less frequent than every 10 years is likely to be problematic.

72. Based on existing experience, do you think the setting of minimum requirements in the EPBD for technical building systems is missing? Would have technical building systems minimum requirements contributed to the improvement of buildings' energy performances?

2500 character(s) maximum

73. Based on existing experience, do you think in the EPBD minimum requirements for technical buildings systems focussing on other factors than heating, air condition, large ventilation systems and domestic hot water e.g. certain building categories, building size, etc., is missing?

2500 character(s) maximum

74. Based on existing experience, do you think in the EPBD requirements is missing for regular inspections of the technical building systems to ensure:

a. that systems' performance is maintained during their lifetime?

2500 character(s) maximum

b. that owners/occupiers are properly informed about the potential improvements to the efficiency of their systems?

2500 character(s) maximum

c. that replacement/upgrading of the technical building systems is triggered?

2500 character(s) maximum

75. Have inspections required by the EPBD, been incorporated into or more tightly linked to other inspection/certification/energy auditing activities and schemes under other EU or national directives?

2500 character(s) maximum

76. Are the requirements for building elements set by Member States optimised to avoid market barriers limiting the installation of building products complying with EU requirements/standards e.g., under eco-design requirements?

2500 character(s) maximum

K. Operational management and maintenance

After the completion of development and/or renovation works, buildings still use energy in a way that impacts building occupants and operators (e.g. via energy costs). Ongoing operation is a key part of a building's life cycle and is related to the goal of building NZEBs by 2020.

77. Based on existing experience, does the EPBD promote the key ways to ensure that buildings meet stringent efficiency targets in their operation?

2500 character(s) maximum

78. Based on existing experience, does the EPBD promote the best way to close the gap between designed and actual energy performance of buildings?

2500 character(s) maximum

79. Based on existing experience, are the provisions provided by the EPBD to stimulate a proactive, innovative maintenance market effective?

2500 character(s) maximum

L. Further Comments

Please include any further comments that have not been covered in the consultation

5000 character(s) maximum

The European Biomass Association (AEBIOM) welcomes the improvements made in the building energy performance in the EU as a whole since the entry into force of the Energy Performance of Buildings Directive (EPBD). However, it seems that the implementation of the EPBD into national legislation varies greatly among Member States. Therefore, before envisaging new and more ambitious measures for the EPBD, the focus should be first put on a more ambitious implementation of the EPBD provisions in all Member States that should, when transposing into national laws, establish well defined objectives, accompanied by strong measures and targets when necessary. The European Commission should give further guidance to correct implementation through effective monitoring and reporting.

When implementing the Directive, Member States should also define clear objectives when it comes to the supply of energy from renewable sources that should be seen as a tool to achieve energy efficiency objectives. In fact, renewable sources of energy like biomass are using increasingly efficient and innovative technologies that allow a reduction of the primary energy consumed. Renewable supply and energy efficiency should go hand in hand as they allow reducing energy demand while decarbonizing energy supply.

This would also allow Member States to align their energy performance of buildings objectives with EU's long term energy and climate objectives (EU 2050 Energy Roadmap 3 no regrets options - increased energy efficiency, development of renewable energy sources and smart infrastructures) and increase policy coherence.

In addition, in order to improve the energy performance of the existing stocks of buildings, further information and data should be collected at national and local levels, especially on the residential sector, in order for Member States to take the most appropriate and well-defined measures to improve the refurbishment rate and the energy performance of these existing buildings, starting with the least efficient ones. Further measures to address the existing stock of buildings should take place under the EED and RES-D, while the scope of the EPBD remains focused and addresses well new buildings and buildings going under major renovation.

AEBIOM reply to this consultation reflects the views of the European bioenergy sector.

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