

23th February 2022

EU Green Deal – ‘Fit for 55’ package

Recast of Directive (EU) 2010/31 on the Energy performance of buildings

Introduction

The German electrical and digital industry association (ZVEI) welcomes the recast of the Energy Performance of Buildings Directive (EPBD). It presents a crucial opportunity to create a futureproof framework in all member states for new buildings and the renovation of the building stock. A climate neutral building sector is only feasible through a significant increase of the renovation rate and depth.

Technologies to achieve this goal already exist and are continuously being improved. The growth of the renovation rate and depth needs to encompass a wider distribution of such advancements. In case of heating systems, the renovation rate needs to be at least six percent, five percent on case of lighting. Hence, plans of the EPBD regarding deep renovations – meaning extensive, deep, and futureproof renovation measures - are justified and important. In the short-term, Member states need to expand on their financial support schemes accordingly while guaranteeing them in the long term. A fast realisation of energy savings through renovations should be encouraged financially just as a particularly high reduction of emissions.

Let us work together to achieve climate neutrality by 2050 – this document provides an overview of key ZVEI recommendations for a revision of the EPBD.

Article 5: Setting of minimum energy performance requirements

- ✓ We support the setting of minimum energy performance requirements, especially regarding requirements relating to specific technologies, as long as these are economically feasible. To avoid straining building owners too much, requirements should be coupled with an event like a sale or a new lease. Existing minimum requirements should be respected by the EPBD.

Article 7: New Buildings

- ✓ We welcome the additional calculation of the Global Warming Potential (GWP) next to the final and primary energy demand. This includes the energy usage during the operational phase in the life cycle as well as aspects of efficiency, durability, and the compatibility with the circular economy. Assessing such factors requires a clear process to avoid administrative burdens which could hamper the speed and depth of renovations. We support the increase of the share of renewable energy in all buildings alongside the introduction of minimum requirements in article 15a of the renewable energy directive (RED).

Article 9: Minimum energy performance standards

- ✓ We agree with the introduction of minimum energy performance standards in every member state. To make these comparable between member states, exact specifications

for the energy performance classes need to be established. Additionally, it is important to calculate the amount of work attached to the introduction of minimum standards, so that member states can increase their capacities accordingly.

Article 11: Technical building systems

- ✓ To ensure the efficient usage of technical building systems over their entire lifespan, paragraph 1 should include a mandatory regular check and optimisation of the electrical installation in buildings.
- ✓ The wording should be changed from Indoor-Air-Quality to the monitoring and regulation of the Room-Climate-Quality to include all factors that contribute to a high level of comfort within buildings.

Article 12: Infrastructure for sustainable mobility

- ✓ We welcome lower thresholds requiring pre-cabling and installation of charging infrastructure. The obligation for Member States to reduce administrative burdens for tenants and owners regarding the installation of charging points creates legal certainty and planning security.
- ✓ Mandating the availability of technical assistance by Member States for retrofitting charging points in existing buildings is an important measure.
- ✓ In new buildings charging infrastructure should generally be planned for every parking spot, given that the building has parking. A general obligation for intelligent grid integration as well as the preparation of bidirectional charging is consistent with the general intention of the directive and highly welcome.
- ✓ In existing buildings, a more consequent expansion of the charging infrastructure is necessary. The Electrotechnical installation of existing buildings in the Union is often outdated for this use case and requires specific attention.

Article 13: Smart Readiness of buildings

- ✓ The Smart Readiness Indicator (SRI) is an important factor for the effective deployment of intelligent technologies in futureproof buildings. Therefore, the mandatory introduction of the SRI is to be welcomed. It must be noted that this should apply to all kinds of buildings with a respective minimum usage of electricity.

Article 14: Data Exchange

- ✓ We support the aim of more data transparency and think that data plays an essential role in the optimisation of buildings energy efficiency. Hence, the employment of data for the life cycle assessment as well as the use and improvement of Building Information Modelling (BIM) should be advanced by the EPBD.
- ✓ The collection of some data, like the energy usage of devices and systems, comes with additional costs. Access to such data should be cost-neutral for all groups.

Article 16: Energy performance certificates

- ✓ Extended energy performance certificates are a suitable means to increase the transparency of the energy efficiency and the electrotechnical condition of a given building in the future. To increase popular acceptance of this tool, the administrative burden related to it should be as low as possible. Moreover, the certificate should be integrated with other documentation attached to buildings. Lastly, it should be comparable amongst member states and represent how future proof a building is, for example with the SRI.

Article 20: Inspections

- ✓ Mandatory regular inspections are to be welcomed. But they can only contribute to more energy efficiency in tandem with mandatory optimisations leading to energy savings. Further, this inspection duty should be expanded to other electrical systems (e.g. lighting),

the electrical installation should. Further, the obligation should be applicable for all types of buildings with a minimum energy usage of 70kW.

(NEW) Article 21: Energy management systems and Energy monitoring

- ✓ To strengthen the usage of energy management systems and the future readiness of electrical installations in existing buildings, we propose a new article for the EPBD. This article should regulate the deployment of energy management systems in all building types as well as regular inspections for them. It should also lay down requirements for the optimisation of the electrical installation as well as the components based on the provisions in article 20 paragraph 8.