



Raising standards for consumers

POSITION PAPER

ANEC position on the Revision of the Energy Performance of Buildings Directive - IIA Roadmap



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INTRODUCTION

ANEC sees the Revision of the Energy Performance Directive as an opportunity within Renovation Wave strategy and the Green Recovery goals, to promote truly sustainable construction, one able to achieve reliable and sustainable performance assessment of buildings and provision of meaningful measurement indicators and information.

ANEC clearly favours 'policy option 3' among those proposed in the roadmap; it is important to amend the EPBD to address in particular the following key aspects among the measures considered.

1 | The **update of the framework for Energy Performance Certificates** is fundamental

With a view to increasing their quality and availability through greater harmonisation, the provision of energy certificates needs to be based on the calculated demand as a prerequisite to assess the energy performance of a building. It should no longer be allowed to use certificates based on energy use because they simply cannot be compared neither among each other for different buildings (due to big variations in the use pattern) nor with EPC based on calculated demand. In fact, energy certificates currently based on the consumption are generally associated with the energy bill. This poses a problem for the credibility of such certificates when consumers rent apartments and their energy bill does not meet their expectations based on the certificate. Proper information provision as well as reliability, traceability and comparability is key to enhance sustainable choices for consumers and construction professionals.

The intended flexibility for adaptation to national and local conditions of the EPBD has to be limited to a minimum to avoid further inconsistencies in the reliability and comparability of environmental information for buildings.

- o *Inclusion of **additional information in the EPCs** and more stringent provisions on availability and accessibility of databases.*

It is necessary that EPCs are comprehensible but also easy to understand. Additional information should therefore be limited to relevant information (e.g. whether a smart metering system is installed). If information is added to allow for deeper consideration of the calculation basis (e.g. for plausibility-checks), this will certainly only address a small part of interested consumers and unnecessarily expand the certificate. Easy and

free-of-charge access to (standardised) databases is considered to be more helpful to this end. Moreover, a potential buyer/tenant will have to trust the certificate (otherwise it is not worth the exercise) and a plausibility-check will be possible by the client when the certificate is being handed over by the issuer of the certificate.

2 | Phased introduction of **mandatory minimum energy performance standards for different types of buildings**

In principle, we welcome this approach. However, this minimum performance should not represent or even be below a level which is already given in different national legislation but be challenging for each climatic zone. Additionally, there should be a meaningful differentiation between building types based on use (residential versus commercial) rather than type of ownership (public versus private) because of different use patterns, the intended lifetimes of the buildings and related maintenance activities.

3 | Introduction of **Building Renovation Passports**

A building passport could give valuable information and be converted into a tool to combine energy savings and circular economy principles. This could be done by giving an overview of the energy-related renovation measures carried out and at the same time documenting where in the building which building material was installed and how (e.g. glued, dowelled). This information is important in order to easily identify the single components. This allows for their efficient return to the material cycle in case of replacement due to maintenance, conversion measures or deconstruction. Moreover, the passport may be combined with a maintenance plan that indicates when single parts (e.g. wooden frame windows) must be maintained (e.g. painted).

4 | Introduction of a **'deep renovation' standard** in the context of financing and building decarbonisation objectives

Deep renovation, i.e. the reduction of energy consumption by 60 %, highly depends on the availability of financial means and therefore needs a balanced approach. This cannot be done on a compulsory basis for private owners, but only with financial incentives. From the technical point of view, the 60% savings depend on the starting point and are basically applicable at decent costs only for low performing buildings. The question is, whether this value should be combined to an absolute target value x (in kWh per m² a). The reason being that once a deep renovation is started, the aim should be rather ambitious, yet achievable without highly costly measures. Furthermore, as for insulation material the focus needs to be shifted from thermal insulation that still contains a lot of grey energy to renewable and re-usable or recyclable insulation materials.

5 | **Resource efficiency and circularity principles**

Consumers generally focus on human health and comfort, accessibility and adaptability of the building to enable them to live independently in their familiar surrounding as long as possible. These aspects need to be addressed at the design stage.

The durability of buildings and construction materials needs to be addressed. We suggest binding producer claims with respect to the service life of a product (or even a building). We highlight the importance to consider and enhance - at the design stage of the constructions - these crucial features:

- o Accessibility and adaptability. To avoid enormous energy and mass flows in the process of building modification, the technical building systems (such as ventilation systems, heating, cooling, domestic hot water supply), ground plans and spatial structures need to be easy to access, flexible and upgradeable.
- o Deconstruction at the end of life to allow recyclability and reusability of parts and avoid waste.

It needs to be noted Life Cycle Assessment (LCA) or Environmental Footprint methodologies do not provide meaningful indicators for the assessment of buildings. Hence, a debate on alternatives is needed. ANEC believes meaningful indicators are

needed for the overall resource use at EU and Member State MS level. These indicators are needed particularly for energy, water, relevant materials, waste and change in land use. At micro-level for buildings, the use-stage indicator energy demand and indoor air emissions are considered to be appropriate but indoor emissions from all relevant emission sources should be addressed by a new legal framework.

6 | Energy poverty

Further to the [Energy poverty recommendation \(2020\) 9600](#), a political and financial framework needs to be developed to ensure **affordable energy prices for vulnerable consumers**; also legal obstacles need to be eliminated (i.e. majority decisions for owners corporations; economic advantages for building owners to improve the energy performance of their flats rented out; legal restrictions to rent increases).

7 | Sustainable mobility

The requirements for new buildings and measures fostering sustainable mobility will also need to be updated to consider E-mobility charging infrastructure. The issue of 'physical' accessibility has not been addressed in the current work (e.g. Alternative Fuels Directive) regarding charging infrastructure. This should be considered in developing a new vision for buildings.

CONCLUSIONS

The Renovation Wave initiative, and with it the revision of the EPBD needs to remain part of a democratic and unbiased process that reflects the needs of society as a whole and individual vulnerable consumers. Diverse interests of all different parties involved have to be balanced, tackling the increasingly widespread problem of Energy poverty.



ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and the use of standards, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 34 countries.

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