



EFIEES' Feedback to EPBD Review Roadmap

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EFIEES represents energy service companies (ESCOs) and their national associations in 12 EU Member States. They account for over 130.000 professionals engaged in the design and implementation of energy-efficiency solutions in buildings and industry. In some countries, they also operate district heating & cooling networks.

In light of the renewed climate ambition for 2030 and of the long-term climate neutrality goal, EFIEES **welcomes a possible review of the Energy Performance of Buildings Directive (EPBD), in line with the objectives and actions announced as part of the Renovation Wave.**

Moreover, as buildings are expected to play a critical role in the decarbonisation efforts which will be required in the years ahead, **it is important not only to ensure that the EPBD adequately contributes to the achievement of the EU's climate and energy objectives, but that it is fully consistent with the entire legislative framework which is going to be addressed by the "Fit for 55 Package"**, notably the EED, RED, ETD, ESR and a possibly extended EU ETS.

Finally, **a proper implementation of existing legislation remains key and should be further secured.**

Considering all these elements, as well as the options specifically outlined in the inception impact assessment for the EPBD review, we would like to highlight the following aspects and recommendations:

- **Consider dynamic energy performance and promote effective energy management**

A revision of the EPBD would represent an occasion to focus not only on improving buildings' energy performance through renovation actions, but also on the role of **solutions that allow to keep and enhance energy performance over time, through proactive energy management. These should systematically be considered as a complement to building renovations, and they should be mandatorily required, where relevant, depending on buildings' type, use and needs.**

Hence, energy management options, such as **Energy Performance Contracting (EnPCs)**, which additionally guarantees a certain level of energy performance/savings in the long-term, should be further promoted within the EPBD and be better reflected in a strengthened framework for Energy Performance Certificates and potential Building Renovation Passports. In both contexts, **primary energy gains** should remain the main indicator of energy performance.

A possible **"deep renovation" standard** should also encompass a **more dynamic approach to buildings' energy performance** and require relevant projects to include at least energy management and monitoring of energy performance. The standard should indeed not only be based on a certain number of measures/works to be implemented but focus especially on delivered energy performance in the long-term.

If mandatory Minimum Energy Performance Standards (MEPS) are going to be set for certain categories of buildings, it is also essential to ensure that these are efficiently operated over time. Both digitalisation and human expertise are key in this respect.

- **Link energy and environmental performance, possibly on a district scale**

Besides improving comfort levels and providing for additional benefits to users, increasing buildings' energy efficiency is primarily key to reduce CO2 emissions. **If energy efficiency must be the prerequisite for any other decarbonisation action (*Energy Efficiency First*), it is nevertheless essential to improve the overall environmental performance of buildings, by enhancing efficient and renewable energy supply.**

The current EPBD already allows for that in its Annex I, setting the common general framework for the calculation of buildings' energy performance. The Annex rightly refers to primary energy as the main performance indicator, based on primary energy factors to be set at national, regional or local level. Moreover, it allows to consider in the relevant calculations renewable energy supplied through the energy carrier as well as generated on-site, provided it applies on a non-discriminatory basis. **Should possible RES requirements be introduced for the building sector, it is essential to fully apply this principle and ensure a non-discriminatory treatment between on-site and nearby RES.**

Buildings should indeed be inscribed in broader decarbonisation plans addressing entire neighbourhoods and districts, necessarily linking renovations with local energy planning, in particular when it comes to decarbonising heating and cooling. In this context, the availability and feasibility of solutions such waste heat recovery should be fully considered as one of the viable options to support buildings' and districts' decarbonisation.