

Press Release: EFIEES' First Views on the Energy Performance of Buildings Directive Recast Proposal

Brussels, the 17th of December 2021

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 (DHC) networks.

EFIEES welcomes the recast of the Energy Performance of Buildings Directive (EPBD), and especially the focus on worst-performing buildings and cost-efficiency, through the introduction of Minimum Energy Performance Standards (MEPS), setting progressive dates to renovate class G and F buildings to a higher standard.

In reaction to this proposal, EFIEES would like to remind two key guiding principles when revising the EPBD:

1) Linking energy and environmental performance, especially at a district level is needed to ensure an optimised impact of EPBD's tools on the performance and carbon footprint of the buildings

First, the **Energy Efficiency First Principle** should be recognised as a **prerequisite to fuel switch on any installations, whether using renewable energy sources or not**. Second, it is of utmost importance to **fully ensure a non-discriminatory treatment between on-site and nearby renewable energy sources**. We thus welcome the respect of such a principle, in one of the key novelties of the recast: the definition of "zero emission buildings" (art. 2 and Annex III). This is indeed essential to make the best use of sustainable and efficient district heating and cooling (DHC) networks. DHC, with an increasing share of renewable energy and waste heat, will be paramount in decarbonising heating and cooling, and reaching the EU indicative objective of 49% RES for buildings sector by 2030 (art. 15a RED revision proposal), thus complementing the higher energy efficiency with a more virtuous energy mix.

2) Focusing on dynamic energy performance and further promotion of effective energy management

The revision of the EPBD should not only aim at improving buildings' energy performance through renovation actions, but should also **strengthen the role of solutions allowing to keep and enhance energy performance over time, through proactive energy management**.

Energy management solutions should be systematically considered, as a complement to buildings' renovation, where relevant, depending on buildings' type, use and needs.

- Energy Performance Certificates and notably their template (Annex V) should reflect whether an Energy Management System/Energy Performance Contract is in place in the building. Likewise, Renovation Passports should **include a "chapter" dedicated to the dynamic energy performance of buildings**.
- National Building Renovation Action Plans should also **focus more on actual energy consumption and on solutions that allow to increase and keep energy performance over time**, such as Energy Performance Contracts (EnPCs) and other solutions offered by ESCOs.

In that respect the provisions of **this EPBD recast should better recognise the role of EnPC, beyond the ability to facilitate the financing of renovation**, as the guarantee of a successful renovation action plan.