

Brussels, 28<sup>th</sup> of June 2022

## EFIEES' Views on ITRE Draft-Report on the EPBD recast

EFIEES represents energy service companies (ESCOs) and their national associations in 10 EU countries. 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.

We have been closely following the work on the **Energy Performance of Building Directive (EPBD) recast**, and welcome the proposal to have stronger tools, and an ambitious timeline to decarbonise the building sector. After going through the draft-report of the ITRE committee, we are glad to see a **better recognition of the Energy Efficiency First principle and a will to enhance district approach**. Yet, we would like to remind two guiding principles, not yet well enough recognised in the discussions concerning the EPBD recast.

### **Energy management solutions are essential to support the decarbonisation of the building sector, not only as financing tools**

The revision of the EPBD must 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, such as Energy Performance Contracts (EnPCs) should thus be systematically considered**, as a complement to buildings' renovation, and not only as a financing solution.

- To ensure that **Energy Performance Certificates** are reflecting a key element of the building's energy performance, namely its functioning, their template (Annex V) should include a **Yes/No indicator on whether or not an Energy Management System/EnPC is in place** in the building. Likewise, Renovation Passports should **include a "chapter" dedicated to the dynamic energy performance of buildings**. Indeed, **energy management**, as integral to the buildings energy performance, has to be reflected by the passports.
- 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**.

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.

### **Decarbonising the heating & cooling sector requires a mix of diversified solutions at different levels**

The EPBD recast should support **Efficient District Heating and Cooling (EDHC) systems** (as defined in the EED), as they contribute to the decarbonisation of the buildings, enable sector integration, and protect citizens against energy poverty. Thus, a **building supplied by an EDHC system should meet the "zero-emission buildings" requirements** and the related **Annex III** should also be **designed in a way which ensures that EDHC systems are integral to ZEB**.