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EFIEES' Position on EPBD recast in view of the trilogue negotiations *Focus on district heating & cooling*

EFIEES is the voice of private energy service companies (ESCOs) and their national associations across Europe. Our members represent over 100.000 professionals committed to the design and implementation of energy efficiency measures in public and private buildings, industrial facilities, as well as to the efficient operation of district heating & cooling networks.

EFIEES has been closely following the discussions on the revision of the Energy Performance of Buildings Directive (EPBD) as we believe that **this recast is a crucial opportunity to ensure an efficient decarbonisation of the European building stock.** In view of the upcoming trilogue discussions on this recast, we want to remind that, in order to allow an effective decarbonisation of heating and cooling and a smart energy system integration, it is **crucial to foster an integrated energy planning at local level, in which district heating and cooling (DHC) systems play a major role.** On that topic, we see **very good elements in both the Council's and the Parliament's position on the EPBD recast, with a clear will to enhance district approach**.

More specifically, according to the European Commission's proposal on EPBD, after 2030, new and renovated buildings will have to comply with Zero-Emission Buildings (ZEB) requirements. Yet, the Commission's definition would not allow ZEB to be connected to efficient district heating and cooling systems unless they exclusively use renewable energy and waste heat sources. This would notably result in encouraging the heat customers to disconnect from already existing and operating district heating systems, while viable (technically or economically) alternative efficient, decarbonised heating solutions will not necessarily be available. This would hamper the decarbonisation of the building stock, as DHC are the main vector of renewables in this sector, harnessing both local renewable heat and sustainable excess heat in their current energy mix. Moreover, the Energy Efficiency Directive (EED) recast defines a clear decarbonisation path for efficient district heating and cooling systems, with the use of at least 50% renewable energy and waste heat by 2035, at least 75% by 2045 and only renewable and waste heat by 2050. As DHC already greatly contribute to the decarbonisation of the heating sector and will do even more in the future, the revision of the Energy Performance of Buildings Directive (EPBD) must ensure that zero emission buildings (ZEB) can be supplied with energy from efficient district heating and cooling systems.

Both the European Parliament and the Council propose amendments to the article and annex related to ZEB definition. One of the amendments (AM 67, Annex III) adopted by the Parliament in plenary goes in the right direction, as it allows for some exemptions to ZEB criteria, including the possibility to supply a Zero-Emission Building with energy coming from an Efficient District Heating and Cooling (EDHC) systems (as defined in the EED). On another hand, the Council's position is more straight forward and allows ZEB, by definition, to be fuelled with any energy coming from an efficient district heating and cooling system (Article 9b(1a)). EFIEES supports these amendments and especially the Council's position. We would like to encourage the negotiators to safeguard these elements while discussing the EPBD in trilogues. It is indeed crucial to ensure that the final text they will agree on, allows to fully harness DHC capacity to contribute to the decarbonisation of the building sector.