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Amending the Energy Performance of Buildings Directive 2010/31/EU (EPBD): A call for tangible and timely results during trilogue negotiations

Europe stands in front of a unique opportunity: creating a fresh boost to jobs and growth in Europe and a win-win for all stakeholders - the planet, EU citizens and European industry, which a forward looking and determined review of the EU Energy Performance of Buildings Directive (EPBD) can provide as part of the wider Clean Energy Package and the pending energy market reform.

Energy efficiency represents a real opportunity to move forward on implementing the Paris climate change agreement, on improving living conditions for ordinary citizens and on creating an integrated modern energy system.

As our energy system undergoes the fundamental and irreversible transformation of decarbonisation, decentralisation and digitisation, buildings are increasingly becoming part of this new energy system: they become a flexible energy source in themselves, where active prosumers self-generate, self-consume, aggregate, trade and sell surplus electricity to the grid. In this new setting, buildings will no longer be a load only (consumer of electricity) but “virtual power houses” that consume and produce electricity at the same time to the overall satisfaction of their occupants and that increase the overall energy efficiency of the grid.

For the pending trilogue negotiations of the European institutions, we particularly invite regulators to act with determination in particular in the following areas. These are essential for tapping into the multiple benefits and opportunities that this recast offers:

- Prioritising the **renovation of the existing building stock** and bringing in the innovation that **technical building systems** will bring into our building stock,
- Setting in place **determined long-term renovation strategies**, and
- Developing a **smartness indicator to assess the technological readiness** of the building.

A true step towards smart buildings should be made by encouraging the roll out of the relevant energy management infrastructure and technologies (such as automation, control and communication technologies) – in particular, non-residential buildings should be leading examples of innovation platforms.

Orgalime sees these recommendations well reflected in the EP ITRE Report of Rapporteur Bendtsen and urges the Council to commit to the same level of ambition, which in our view would strike the right balance for the final Directive in the light of the challenges and opportunities that Europe faces.

Orgalime, the European Engineering Industries Association, speaks for 41 trade federations representing the mechanical, electrical, electronic, metalworking & metal articles industries of 23 European countries. The industry employs nearly 11 million people in the EU and in 2016 accounted for some €2,000 billion of output. The industry represents over a quarter of the output of manufactured products and over a third of the manufactured exports of the European Union.

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In our view, the EP report particularly understands the benefits for all Europeans stemming from strengthening building automation and control systems in Articles 14 and 15, a forward looking long-term renovation strategy as well as proper financing provisions of Articles 2 and 10.

Articles 8, 14 and 15 are indeed essential to promote the development of buildings into future power houses.

Especially the Smartness Indicator represents a promising tool in terms of accelerating smart technologies for increased energy efficiency in buildings. In the interest of a harmonised and effective implementation throughout the EU it is important that the Smartness Indicator is of binding nature and that its methodology should be developed by European standardisation Organisations considering that the Smartness Indicator has to be reproducible to guarantee comparability and transparency.

Furthermore, its definition should include enhanced energy savings and looks at indoor air quality, full/part load conditions and renewable energy generation on-site.

In addition, it would be beneficial to insist on “smart charging infrastructure” to satisfy user needs as the number of electric vehicles increases (see Orgalime Position Paper [here](#)). Including a stakeholder consultation and test-phase would also contribute to setting in place an indicator that is fit-for-purpose.

Finally, we would appreciate a clarification about the links of the Smartness Indicator with the existing Energy Performance Certificates and newly suggested building renovation passport to consistently inform the consumer and avoid confusion.

IN CONCLUSION

A determined, forward-looking EPBD review is an unmissable opportunity, which not only supports the EU's and the Paris energy and climate goals, but would also help consumers manage their energy consumption in the digital age, accelerate the integration of renewables, contribute to the development of e-vehicle charging infrastructures and enable the emergence of a modern, flexible electricity grid that can accommodate both, centralised and decentralised production.

We therefore count on the Estonian Presidency and Member States in particular to step up their efforts in comparison the General Approach reached in June, which falls far too short in both, bringing the benefits of the Clean Energy Package to consumers and in tapping into the undisputed local jobs, growth and innovation potentials that this review offers.

European Engineering Industries represented by Orgalime remain committed to contributing to a successful implementation of the future Directive.

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