



The Coalition for
ENERGY SAVINGS



**Coalition for Energy Savings:
Feedback to EPBD recast proposal**

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The Coalition for Energy Savings welcomes the EPBD recast proposal. It strengthens some existing provisions but fails to fully leverage the Energy Efficiency First Principle. The proposal does not accelerate actions at the pace needed to achieve the EU's 2030 energy and climate targets and improve its energy security. The points below summarise our initial reaction to the proposal:

Minimum Energy Performance Standards (MEPS): We support the provision to set up MEPS, but this article should be further strengthened. As energy renovations require long-term planning and predictability for market actors and citizens, the limited scope and timeframe of the proposed MEPS risk missing out on the multiple benefits of ambitious energy renovations and creating lock-in effects. To ensure the achievement of the 2030 and 2040 milestones for the EU building stock and the transformation of all existing buildings into Zero-Emission Buildings (ZEBs) by 2050, MEPS should not be limited to G and F buildings only. An effective MEPS scheme shall be designed to ensure that all buildings are renovated to achieve higher levels of performance over time, with more modern technical building systems and new, efficient and renewable-based heating and cooling technologies. This will ensure deep renovations (whether in one go or staged) are accelerated and deliver their multiple benefits, including greenhouse gas emission cuts and mitigation of energy poverty.

ZEBs: We welcome the new ZEB definition. However, as it only addresses operational carbon emissions, its name should better reflect this aspect. We believe that using only primary energy consumption (PEC) indicators to define ZEBs might deprioritize end-use energy savings measures in buildings. To promote quality design of ZEB buildings that respects the Energy Efficiency First Principle, we believe that the EPBD Annex III should establish thresholds for both final and primary energy use. The PEC thresholds used for new constructions should also be lowered. For new buildings, given the need to urgently stop climate change and improve the EU energy security, the 2030 date should be advanced. Specific attention should also be put on maintaining high operational energy performance over time in new buildings.

Deep renovation: We welcome the introduction of a legally binding definition for staged-deep and deep energy renovation but regret that it is not being used in the Directive as the underlying guiding principle for the ambition of all energy renovations or financing programmes. All national renovation programmes should provide proportionately greater financial incentives for deep renovations (which should consider all solutions available in the market).

Building Renovation Plans (BRPs): We support that BRPs are proposed to become more operational roadmaps than Long-term Renovation Strategies. BRPs are important planning (and reporting) tools for Member States, thus they shall provide precise trajectories for the reduction of energy use and full decarbonisation of all building segments. MEPS should be instrumental in achieving the latter. Also, BRPs should be better linked with other EU planning tools to grasp the positive synergies with other Directives (for instance EED Art.23) and local heat planning. When



drafting BRPs, cooperation with stakeholders, including energy communities, is crucial to ensure that renovation efforts are tailored to citizens' needs.

Energy Performance Certificates (EPCs): Considering the many provisions in the proposal that rely on the soundness of the EPC framework, EPCs coverage should be further boosted by, for instance, introducing an obligation for all buildings to have an EPC in place well before 2030. Without a comprehensive coverage, all the positive changes suggested (ensuring more harmonisation, comparability, and reliability of EPCs) might end up having little to no impact on boosting renovations and improving information on the energy performance of buildings.