

EU.BAC FEEDBACK ON THE ROADMAP OF THE REVIEW OF THE DIRECTIVE 2012/27/EU ON ENERGY EFFICIENCY

eu.bac fully supports a revision of the EED, in combination with additional non-regulatory policy measures.

New economic and financial measures should be put in place, supporting the transition to energy efficient, smart buildings. The sector was particularly affected by the crisis that followed the Covid-19 outbreak: the new EU co-funded energy efficiency investments will be key to strengthen the European economy's resilience and sustainability. The allocation of dedicated EU funds should therefore be conditioned to: 1) the deployment of building automation and control solutions and 2) energy audits, able to properly assess and prove the real cost-effectiveness of the measures applied. Also, the funds must be strongly linked to the compliance with the implementation of the mandatory requirements set in the EU Directives.

One of the major changes set at EU level in the revised EPBD in order to make the building stock energy-efficient, future-proof and decarbonized was the introduction of mandatory requirements to optimize technical building systems (TBS), install individual room temperature controls and equip large non-residential buildings with building automation and control functionalities. Six months after the deadline for the transposition, there's still a widespread lack of ambition of the Member States in transposing these measures. Funds linked to the implementation of these measures would contribute to achieving savings corresponding to 14% of total building primary energy consumption (64 Mt CO₂ annual savings and €36 billion energy bill savings triggered – Waide study, 2018).

On the Renovation Wave: in addition to the inputs already provided (eu.bac 3-pager attached), public buildings should be at the forefront when it comes to energy efficiency, indoor environment quality, smartness and sustainability. Today, this is not the case. There should be higher ambition on public buildings, covering all the existing ones (exceptions only for the new buildings able to demonstrate state-of-the-art equipment) at all levels (central, regional, local).

The legislator should also not miss the opportunity to require the installation of BACS in all public buildings across the EU. Their deployment, continuously ensuring optimal performance of all TBS installed, can deliver savings (52% in offices, according to EN15232) and optimal indoor environmental quality even in historic buildings (as often the case for public buildings in EU), fully preserving their heritage value, unlike other solutions. Even basic measures, such as installing individual room temperature controls or hydronic balancing quickly lead to significant energy savings with a short payback time, and should be rolled-out at large scale in public buildings. Programs for staged deep renovation should be prioritized and the potential of EPCs and ESCOs should be unleashed, with further improvements to the existing EED Article 18.

On public procurement rules, the EED shall be more prescriptive on the criteria that should be used such as:

- Make BIM standards mandatory when setting minimum requirements for tenders (as in Denmark, where BIM is mandatory at all levels)
- Best certification practices from the private sector and building environmental certification (LEED, HQE, BREAM...) shall be encouraged
- Strong incentives in pushing Energy Performance Contracting practices across Europe
- Strong incentives for commissioning and maintenance of TBS

On trainings, we fully support the establishment of provisions to incentivize up- and re-skilling, technical education programs and apprenticeships. Skilled professionals are essential in order to effectively deploy (and assess) the technologies needed to achieve a fully decarbonized building stock (such as BACS).

Measures on “information dissemination and awareness-raising campaigns” would be beneficial: one of the most relevant barriers is related to the little knowledge of owners and occupants of the multiple benefits of EE solutions.