

eu.bac key suggestions for the vote on the EPBD Review in ITRE

TOPIC	AM	VOTING RECOMMENDATION	JUSTIFICATION
Art.2 – point 3 Definition of “technical building system”	CA 1	SUPPORT	The inclusion of “solar shading” is positive, as solar shading technologies have significant saving potential for cooling energy. They should be considered systematically for optimization of energy performance of technical building systems.
Art. 2 Definition of BACS – “Building automation and control systems”	CA 4	SUPPORT	In the light of Art.14/15, a definition of “building automation and control system” is needed. The definition of CA 4 refers to the one used in the appropriate standards.
Art.2 – point 17 Definition of “effective rated output” with inclusion of “full load” and “part load” conditions	CA 5	SUPPORT	The definition of “full load” and “part load” conditions is necessary for other parts of the text (e.g. Art. 8.5, 14 and 15), to ensure the match between expected and actual energy consumption, under real-life conditions.
Art. 2a – paragraph 1 Content of National Long-Term Renovation Strategies	CA 6	SUPPORT	In this CA are included positive amendments compared to the Commission’s proposal, such as policies and actions to: (ca) policies and actions to support targeted low-cost energy efficiency measures and renovations; (d) address energy poverty and split-incentive dilemmas; (ea) accelerate technological transition towards smart and well connected buildings; (f) promote skills, training and education in construction, energy efficiency and smart technologies (...)

<p><i>Art. 8 – paragraph 1 – subparagraph 3</i></p> <p>Requirements for Hydronic Balancing in newly installed or replaced heating systems</p>	<p>AM 57 ENVI 1st part</p> <p>(originally from MEP LIESE)</p>	<p>SUPPORT</p>	<p>Hydronic balancing is a fundamental capital-light, fast-pay-back no-regret measure for optimizing the energy performance of water-based systems.</p>
<p><i>Art. 8 – paragraph 5</i></p> <p>Assessment (at full load and part load conditions) of the overall energy performance of the complete altered system after installation, replacement or upgrade of TBS</p>	<p>CA 21</p>	<p>SUPPORT</p>	<p>Optimization of Technical Building Systems is crucial both for buildings with “low” energy performance, delivering high “absolute” savings, but also for nZEBs, delivering high “relative” savings due to prevalence of part load conditions.</p>
<p><i>Art. 8 – paragraph 5</i></p> <p>Assessment only of the energy performance of the altered TBS, not of the overall system</p>	<p>AM 421</p> <p>(MEP Pieper, Niebler, Reul)</p> <p><u>(FALLS if CA 21 adopted)</u></p>	<p>OPPOSE (if CA 21 FALLS)</p>	<p>This amendment would not require assessment and documentation of the overall energy performance of the complete altered system, with a focus only on the altered part. Contrary to the intention of the Commission’s proposal, this would imply that technical building system performance would be disregarded, and the text would have little to no added value.</p>
<p><i>Art. 8, paragraph 5a (new)</i></p> <p>Requirements for individual room temperature control functionalities in newly built and</p>	<p>AM 423</p> <p>(MEP Marcellesi)</p>	<p>SUPPORT</p>	<p>Individual room temperature control is a functionality that is basic for an acceptable energy performance in any building in continuous use. It is missing in a large part of the corresponding stock, despite a pay-back time of the low-capital investment of about 2 years. It is a low-capital investment (1.5 €/m²), payback 1-3 years, returns 7 times higher than the costs.</p>

existing residential buildings			
<p><i>Art. 8, paragraph 5a (new)</i></p> <p>Requirements for individual room temperature control in new buildings; same requirements in existing buildings when heat generators are replaced</p>	AM 57 2 nd part (ENVI)	SUPPORT	Same as above. Compared to AM 423, this AM applies also to non-residential buildings, but only for new ones. These requirements applies to all the other buildings whenever the heat generators will be replaced, in order to optimize the system and achieve major energy savings.
<p><i>Art. 8, paragraph 5a (new)</i></p> <p>Requirements (by 3 years after entry into force) for individual room temperature control functionalities in newly built and existing residential buildings</p>	AM 422 (MEP Kofod, Griffin)	SUPPORT	See AM 423
<p><i>Art. 8 – paragraph 6a (new)</i></p> <p>Member States incentives for BACS in long-term renovation strategy</p>	AM 447 (MEP Nica, Molnár, Zorrinho)	SUPPORT	In order to deliver the benefits of BACS and effectively address the market and regulatory failures, and in particular the split incentives between owners and tenants, incentives from MS are necessary.
<i>Art. 14</i>	CA 24	SUPPORT	Endowing larger non-residential buildings with functionalities that continuously

<p>Inspection of heating systems (including requirements for BACS in large non-residential buildings and BACS alternative to inspections in residential buildings)</p>			<p>monitor and adapt energy use to actual part load conditions is the most cost-effective way to optimize their energy consumption. BACS can deliver multiple benefits: huge energy savings, empower consumer and businesses to cut their energy costs, improve comfort and health, boost digitalization and economic recover, tackle energy poverty. BACS are low-capital investment, with short payback times (average 2 years), that can save up to 24% EU buildings energy consumptions, with returns 9 times higher than the costs. An optimization of BACS will bring 200.000-300.000 direct jobs and 3.7 million indirect jobs by 2030.</p>
<p>Art. 14 Requirements for BACS in non-residential buildings</p>	<p>AM 502 (MEP Marcellesi) (FALLS if CA 24 adopted)</p>	<p>SUPPORT (Only if CA 24 FALLS)</p>	<p>See CA 24</p>
<p>Art. 14 Requirements for BACS in non-residential buildings</p>	<p>AM 501 (MEP Kumpula-Natri and others) (FALLS if CA 24 adopted)</p>	<p>SUPPORT (Only if CA 24 FALLS)</p>	<p>See CA 24</p>
<p>Art. 14 No requirements for BACS, only a possible alternative to physical inspections</p>	<p>AM 500 (MEP Kumpula-Natri) (FALLS if CA 24 adopted)</p>	<p>OPPOSE (If CA 24 FALLS)</p>	<p>BACS can deliver multiple benefits: huge energy savings, empower consumer and businesses to cut their energy costs, improve comfort and health, boost digitalization and economic recover, tackle energy poverty. This amendment is less ambitious than CA 24 and it will miss the huge potential of BACS, not addressing effectively the market and regulatory barriers.</p>
<p>Art. 14 Requirements for BACS in non-residential buildings (trigger: "energy renovation")</p>	<p>AM 444 (MEP Langen) (FALLS if CA 24 adopted)</p>	<p>SUPPORT WITH RESERVE (Only if CA 24 FALLS)</p>	<p>BACS can deliver multiple benefits: huge energy savings, empower consumer and businesses to cut their energy costs, improve comfort and health, boost digitalization and economic recover, tackle energy poverty. This amendment is less ambitious than CA 24 and it will achieve just a minimum part of the potential of</p>

			BACS, not addressing adequately the market and regulatory barriers.
Art. 14 Requirements for BACS in non-residential buildings (trigger: "retrofit")	AM 446 (MEP Grossetête, Sander, Morano) (FALLS if CA 24 adopted)	SUPPORT WITH RESERVE (Only if CA 24 FALLS)	See AM 444
Art. 14 "Advice to users" as an alternative to inspections of heating systems	AM 508 (MEP Martin, Beres) (FALLS if CA 24 adopted)	OPPOSE (if CA 24 FALLS)	This AM reintroduces alternative measures to inspections and BACS functionalities relying on "advice to users". Such measures cannot maintain energy performance of buildings and their technical systems effectively.
Art. 14 Requirements for BACS in residential buildings	AM 509 (MEP Marcellesi) (FALLS if CA 24 adopted)	SUPPORT (Only if CA 24 FALLS)	Endowing large residential buildings with functionalities that continuously monitor and adapt energy use to actual part load conditions is the most cost-effective way to optimize their energy consumption. BACS can deliver multiple benefits: huge energy savings, empower consumer and businesses to cut their energy costs, improve comfort and health, boost digitalization and economic recover, tackle energy poverty. BACS are low-capital investment, with short payback times (average 2 years), that can save up to 24% EU buildings energy consumptions, with returns 9 times higher than the costs. An optimization of BACS will bring 200.000-300.000 direct jobs and 3.7 million indirect jobs by 2030.
Art. 14 – paragraph 3a (new) "Adequate advice to users" as an alternative to inspections of heating systems	AM 69 ENVI (originally from MEP Liese, Florenz)	OPPOSE	As AM 508, This AM reintroduces alternative measures to inspections and BACS functionalities relying on "advice to users". Such measures cannot maintain energy performance of buildings and their technical systems effectively.

<p><i>Art. 15</i></p> <p>Inspection of air-conditioning systems (including requirements for BACS in large non-residential buildings and BACS alternative to inspections in residential buildings)</p>	<p>CA 25</p>	<p>SUPPORT</p>	<p>As CA 24, endowing larger non-residential buildings with functionalities that continuously monitor and adapt energy use to actual part load conditions is the most cost-effective way to optimize their energy consumption.</p> <p>BACS can deliver multiple benefits: huge energy savings, empower consumer and businesses to cut their energy costs, improve comfort and health, boost digitalization and economic recover, tackle energy poverty.</p> <p>BACS are low-capital investment, with short payback times (average 2 years), that can save up to 24% EU buildings energy consumptions, with returns 9 times higher than the costs.</p> <p>An optimization of BACS will bring 200.000-300.000 direct jobs and 3.7 million indirect jobs by 2030.</p>
<p><i>Art. 15</i></p> <p>“Advice to users” as an alternative to inspections of air-conditioning systems</p>	<p>AM 538 (MEP Martin, Beres) <u>(FALLS if CA 25 adopted)</u></p>	<p>OPPOSE (If CA 24 FALLS)</p>	<p>As AM 508, this AM reintroduces alternative measures to inspections and BACS functionalities relying on “advice to users”. Such measures cannot maintain energy performance of buildings and their technical systems effectively.</p>
<p><i>Art. 15</i></p> <p>Requirements for BACS in non-residential buildings</p>	<p>AM 544 (MEP Kumpula-Natri and others) <u>(FALLS if CA 25 adopted)</u></p>	<p>SUPPORT (Only if CA 25 falls)</p>	<p>See CA25</p>
<p><i>Art. 15</i></p> <p>Requirements for BACS in residential buildings</p>	<p>AM 549 (MEP Marcellesi) <u>(FALLS if CA 25 adopted)</u></p>	<p>SUPPORT (Only if CA 25 falls)</p>	<p>Endowing large residential buildings with functionalities that continuously monitor and adapt energy use to actual part load conditions is the most cost-effective way to optimize their energy consumption.</p> <p>BACS can deliver multiple benefits: huge energy savings, empower consumer and businesses to cut their energy costs, improve comfort and health, boost digitalization and economic recover, tackle energy poverty.</p>

			<p>BACS are low-capital investment, with short payback times (average 2 years), that can save up to 24% EU buildings energy consumptions, with returns 9 times higher than the costs.</p> <p>An optimization of BACS will bring 200.000-300.000 direct jobs and 3.7 million indirect jobs by 2030.</p>
<p><i>Art. 15</i></p> <p>Improved wording for BACS as alternative to inspections in residential buildings</p>	<p>AM 554 (MEPs Kofod and Griffin)</p> <p><u>(FALLS if CA 25 adopted)</u></p>	SUPPORT (Only if CA 25 falls)	<p>This amendment clarify that Member States should give the opportunity to choose between physical inspections or BACS functionalities as defined in the text.</p>
<p><i>Article 15 – paragraph 3 a (new)</i></p> <p>“Adequate advice to users” as an alternative to inspections of air-conditioning systems</p>	<p>AM 74 ENVI (originally from MEP Liese, Florenz)</p>	OPPOSE	<p>As AM 508, 69 ENVI and others, this AM reintroduces alternative measures to inspections and BACS functionalities relying on “advice to users”. Such measures cannot maintain energy performance of buildings and their technical systems effectively.</p>
<p><i>Art. 18 – paragraph 1</i></p> <p>Documentation of technical building system performance</p>	<p>AM 563 (Petersen and others)</p>	SUPPORT	<p>Independent control of documentation needs to be ensured, to guarantee added value for owners. The documentation on conformity with system requirements should be an integral part of the Independent control system.</p>
<p><i>Art. 8 – paragraph 6</i></p> <p>Smartness Indicator</p>	<p>CA 26</p>	SUPPORT	<p>The smartness indicator is a key tool. This amendment is important is it specifies that, beyond flexibility and demand response, the smartness indicator should cover intelligent connected features with enhanced energy saving capabilities. Furthermore, it highlights the importance to match expected with actual energy performance by adapting energy use to actual part load conditions and individual needs.</p>