

## **PU Europe reaction to the recast of the Energy Performance of Buildings Directive (EPBD)**

**PU Europe, representing the European polyurethane insulation industry, welcomes the proposed [recast of the EPBD](#) issued on the 15<sup>th</sup> of December. This proposal contains numerous clarifications and new provisions that will foster a more energy efficient and climate friendly building stock if implemented properly by member states.**

As part of the complex yet coherent recast, linkages would be created between the EPBD, the Energy Efficiency Directive and the Energy Union governance regulation, this is to be commended for as it will put central stage the role of buildings in an energy efficient and fully decarbonised economy by 2050. As for the 2030 time horizon and the objective of the Renovation Wave Strategy to renovate 35 million building units, the Directive will create the opportunities and enabling conditions for the triggering of thermal energy renovation activities (notably thanks to the introduction of Minimum Energy Performance Standards). On the introduction of whole life-cycle GHG emissions reporting obligations for new buildings, Arnaud Duvielguerbigny, PU Europe Secretary General commented *"this addition in the recast EPBD shows the path to all economic actors and will drive necessary investments in making our excellent PUR/PIR insulation products ever more climate friendly. It is highly important for our sector that references to the CEN TC/350 work<sup>1</sup> and Level(s) are made when introducing those whole life-cycle GHG emissions provisions"*.

On the point of attention for PU Europe, the industry foresees that delivery on the Renovation Wave Strategy objective might come a bit later than foreseen, even with the clearer national building renovation plan, and will ultimately depend on the willingness of member states to boost actions on the ground.

And last but not least, while recognising the significant work of the European Commission to take a holistic view with the recast EPBD, PU Europe highlights two areas where targeted improvements would be needed:

- The Energy Efficiency 1<sup>st</sup> principle should be given a higher role throughout the EPBD, and
- The definitions of NZEB (nearly zero-energy building) and ZEB (zero-emission building) should be altered to reflect science and ensure a proper and secure decarbonisation of buildings. The term "emission" does cover far more than CO<sub>2</sub> ones arising at local level during the operation of buildings. Consumers should not be misled on the true environmental performance of buildings via oversimplification. Furthermore, the NZEB standards and the primary energy use figures indicated for ZEB in Annex III are not ambitious enough.

The European polyurethane thermal insulation industry has been contributing for decades to a more energy efficient and low carbon building stock, and is committed a climate neutral and resource efficient Europe by mid-century. PU Europe will work with European decision-makers in 2022 to help finalise this critical legislation.

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<sup>1</sup> CEN TC/350 "sustainability of construction works" is the standardisation committee responsible for the development of horizontal standardized methods for the assessment of the sustainability aspects of new and existing construction works (buildings and civil engineering works) in the context of the UN Sustainable Development Goals and of the circular economy.

#### About PU Europe:

PU Europe is the European voice of the polyurethane (PUR / PIR) insulation industry. The 110 manufacturing sites and more than 20,000 direct jobs in the PU rigid foam sector contribute to tackling the carbon footprint of the buildings stock responsible for around 36% of the CO<sub>2</sub> emissions of the European Union (more information about us via [www.pueurope.eu](http://www.pueurope.eu) and lobbying transparency register ID number 27993486325-38).