

Reference: Revision of the Energy Performance of Buildings Directive (EPBD) –European Commission Roadmap consultation

PU Europe, representing the European polyurethane insulation industry welcomes the opportunity to provide input to the European Commission's Inception Impact Assessment (IAS) on the review of the Energy Performance of Buildings Directive, and take the opportunity of this input to restate its commitment to a climate neutral and resource efficient Europe by mid-century.

As properly described in the IAS, the EPBD review shall indeed be seen in the broader context of our fight against climate change which cannot be won in the absence of a strong focus on cutting energy consumption in the building sector. That is why in order to fulfill our 2030 & 2050 objectives, a review of the EPBD is needed even if the actual legislation, amended in 2018, is not yet fully and properly implemented.

Out of the options presented in the IAS, PU Europe strongly supports a review of the EPBD flanked by non regulatory measures, therefore the options 3 and 2 together.

Review of the EPBD:

- **Mutually reinforcing EED and EPBD legislations for cutting more effectively energy consumptions:**

The EPBD lastly amended in 2018 recognizes, via article 2a, the key role of building renovation in the transition to a carbon neutral future via the establishment of national long-term renovation strategies (LTRS). In that article, Member States shall support the renovation of the national stock of residential and non-residential buildings into a highly energy efficient and decarbonised building stock by 2050. Because of the new political context with the 2019 European Green Deal and the 2020 Renovation Wave Strategy, we believe the time is ripe to formalize the building sector contribution to an EU level energy savings target by 2030. While significant provisions shall be changed under the Energy Efficiency Directive (EED) (i.e. building sector's contribution to the energy savings target by 2030 - and moving forward to 2040 & 2050- could be set under article 3), the review of the EPBD shall ensure consistency, facilitate the reporting exercise from member states and maximise the impact of both directives. With bold and high level political visibility in the EED and EPBD, no doubt that measures (from regulatory, technical, financial to more soft ones) at national level would be unleashed and that energy and CO₂ savings in the building sector would be achieved at a greater pace. We are also calling for both the EED and the EPBD to feature well the Energy Efficiency First principle, with a focus on decreasing the energy consumption of the building envelope, therefore targeting heating & cooling demand.

- **Improving the quality and consistency of Energy Performance Certificates (EPC)**

For many of the measures needed under the revised EPBD, data will be essential. Therefore the EPC framework shall ensure that data is of high quality and accessible to various stakeholders. As part of the actors that should be able to access it, further to the owners/tenants of the buildings, we can think of decision-makers, urban planning authorities, and financial institutions.

- **Building logbook featuring information on energy renovation (BRP)**

Based on the EPC framework, information about the energy renovation steps and potential for energy savings shall be logged into either a dedicated Building Renovation Passport (BRP) or featured into a more generic building logbook (common repository for all relevant building data). In addition to the technical measures that could be implemented (and their timeline), sources of technical support and funding shall be highlighted. When implementing MEPS, there shall be a duty from building owners to look and act on the recommendations for improvements featured in the building logbook/BRP.

- **Phased/staged introduction of Minimum Energy Performance Standards (MEPS) for existing buildings**

We support the European Commission's plan to gradually mandate MEPS for different types of buildings. In our views the focus shall be on the worst energy performing buildings and not only in the residential segment but also for public and industrial/commercial buildings as well. EPCs per building typology should guide decision-makers interventions in their quest for energy savings. It would give LTRS a lot more predictability for market actors if MEPS were used and communicated well in advance. In connection to EPC implementation, building owners and tenants shall look at their building logbooks/BRPs, and act on the recommendations they contain (unless they can demonstrate their costs outweigh their benefits).

- **Setting up deep energy renovation standard(s)**

Such standard(s) can increase visibility and bankability of renovation programme for financing institutions, however we warn that the best metric for policy makers will most probably be the amount of kwh saved per m². In that spirit, any deep energy renovation standard shall take account the energy demand of the building before its renovation and then look at what can be achieved in a cost effective way (bearing in mind the energy & climate objectives and the multiple benefits of energy renovation). Therefore the desire to communicate a simple -XX % energy saving figure shall be resisted because if the building before renovation has a rather low energy demand, the costs to bring this demand down by say 60% could be high - on the contrary if it is a leaky building, even a 60% energy cut could be far away from its energy saving potential. With regards to the discussion on the doubling and even tripling of the renovation rate, we believe that what matters the most is the quality of the deep energy renovation works and the amount energy savings they delivered.

Non-regulatory measures:

The EPBD needs to be supported by other instruments to truly deliver on its promises:

- Support measures like technical assistance, project development assistance and financing are essential to help authorities in designing, developing and triggering renovation plans and LTRS (also for the implementation of MEPS, notably for the most vulnerable groups).
- Accompanying the skills and the knowledge of the building and construction sector workforce will be key to make sure quality renovations are delivered and that no bottleneck stands in our way to a decarbonized and climate resilient building stock.

At a time when renovating our dwellings, public buildings but also our commercial and industrial premises makes a lot of sense from a climate but also an economic perspective we believe that the review of the EPBD together with the implementation of the national Recovery and Resilience Plan represent a unique opportunity for Europe to grasp the multiple benefits linked to energy renovation: improved health and comfort, reduced energy poverty and the creation of jobs and economic growth.

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 CO₂ emissions of the European Union (more information about us via www.pueurope.eu and lobbying transparency register ID number 27993486325-38).