

## Mechanical installer's perspective on the implementation of the Smart Readiness Indicator

The revised Energy Performance of Buildings Directive 2018/844 (EPBD) introduced the establishment of a new Smart Readiness Indicator (SRI). This indicator has the potential of raising awareness on the availability and range of smart services readily available for buildings and to promote their uptake. This could result in significant improvements to the energy consumption of buildings and decarbonisation of the European building stock.

The association representing European installers of building technologies, GCP Europe, would like to express our support for the implementation of the SRI.

We are happy to see that some of our comments to the European Commission's public consultation have been taken into consideration. We strongly support the respect for technological neutrality in the calculation methodology, and the promotion of assessments made by third-party experts as the ones to contain legal value. We believe these two principles are essential for ensuring an effective SRI implementation. Furthermore, within this paper we seek to further expand on a series of questions we believe are necessary to ensure the SRI is a success.

### 1. Broad acceptance in Member States

The revised EPBD makes it optional for Member States to implement the SRI. We believe that in order for it to bring about the most benefits to European society it should be employed in most Member States. Should the SRI only be taken-up in a minority of Member States this would undermine the credibility of the scheme. We believe that the more widespread the implementation is, the more effective the scheme will be for European consumers, as there would be more confidence in the scheme as an information tool conveying meaningful comparable information.

We find at this moment that the SRI is difficult to communicate to building owners given the high number of parameters and sub-indicators to be measured. Therefore, we believe it is important to provide standardised information on the presence of smart services in buildings that is easy to understand. A special emphasis should be added on the benefits these services provide (lower energy bills, improvement to indoor environmental quality, etc).

## 2. Links to the Building Renovation Strategies

The long-term renovation strategies under the EPBD offer a unique opportunity to improve the smart readiness of the EU's building stock. We strongly encourage Member states to adopt ambitious renovation plans, which promote the uptake of building technologies that help optimise the energy consumption of buildings while improving the indoor air quality and comfort conditions.

In our view, the role of the SRI is to provide comprehensive information to building owners and occupants about the potential of buildings to optimise energy use and meet the needs of the occupants. When issuing the SRI score of a building, we further believe that it should be accompanied by recommendations on cost-effective measures to improve the smart-readiness and energy efficiency of the building.

We therefore strongly support the proposal of the study team to offer in addition to the overall score information regarding the smart-readiness of individual domains assessed. In order to improve the communication of these parameters to consumers, we strongly urge them to be communicated in a simple and standardised way. During the on-site inspections for issuing the SRI, these should be accompanied by recommendations on how to improve the smart-readiness of buildings. We suggest integrating these recommendations in a building renovation passport. This information would allow building owners to make informed choices on the investment needs of the building.

Furthermore, we believe that in order to promote the uptake of smart building services, Member States should develop a series of comprehensive policy tools, such as preferred access to financing or tax incentives, to nudge investments towards deep building renovations that help decarbonise the European building stock.

## 3. Practical considerations on issuing the building scores

Considerable resources have been used to refine the calculation methodology in order for it to be future-proof and to proportionately weigh the importance of different criteria in the final building score. However, questions remain as to who the main actors are who will be responsible for issuing these building scores.

Installers are responsible for designing and maintaining the technical building systems that make possible the different services assessed by the SRI. We therefore believe that we are best positioned to issue this rating as the main link between the manufacturers of building technologies and occupants.

We look forward to cooperating with the European Commission and the study team on helping improve the methodology and evolution overtime through the Topical Group C.

**About:**

GCP Europe is the voice of the efficient building engineering services. The association represents the interests of the Building Services Engineering Sector: plumbing and HVAC at the European Union level.

People spend about 90% of a day in buildings. Indoor climate and water supply therefore belong to the main features determining indoor comfort. On the other hand, more than 40% of the final energy consumption in Europe is used for heating needs of buildings and for domestic hot water production. Hence, technical building systems have become a priority area to reduce the use of traditional energy sources.

For further information please visit [www.gcpeurope.eu](http://www.gcpeurope.eu) or contact us at [info@gcpeurope.org](mailto:info@gcpeurope.org).