

Inception Impact Assessment on the review of the Energy Performance of Buildings Directive

GCP Europe Position

GCP Europe members welcome the proposal for a revision of the Energy Performance of Buildings Directive (EPBD) to foster deep renovations and deliver on the Renovation Wave targets for 2030. The decarbonisation of the buildings sector is indeed vital to deliver on the EU's climate and energy objectives, given that buildings are responsible for 40% of total energy consumption.

In this context, our members that include European installers and building professionals for building technologies, plumbing, ventilation, air conditioning, refrigeration and heat pump equipment, will play a vital role in implementing many of the building renovations that will take place under this initiative.

The crucial role of installers

Delivering the deep renovations needed will depend on the knowledge and expertise of building professionals, who have the most in-depth knowledge on the design of systems, proper maintenance and operation and who can provide tailor-made solutions to maximise energy efficiency gains and indoor environmental comfort and quality.

The deployment of renewable energy technologies, which involves the use of new technologies and a combination of different heat generators, requests a deep technical knowledge. Installers also have a crucial role to play in ensuring the uptake of these new technologies. Being in direct contact with the consumers, they can present these new solutions and provide the customers with tailor-made solutions based on users' specific needs.

In addition, energy efficient buildings with airtight envelopes need mechanical ventilation systems with heat recovery to ensure a correct airing. These systems can only be installed by professionals.

The increasing need for cooling in both residential and non-residential buildings should also be taken into consideration when revising the EPBD. In this context, contractors have an important role to play in achieving the EU energy efficiency targets.

Supporting the increasing demand for skills

Supporting skills and employment strategies will be key elements to meet the climate targets as well as essential to the recovery of the European economy. To create new jobs and to address existing shortages of qualified staff, investments in skills will be necessary. In particular, specific skills are needed for sustainable energy renovation.

Delivering the deep renovations needed will depend on the knowledge and expertise of building professionals. However, even though the services of our industries are vital for achieving the objectives of the Energy Performance of Buildings Directive, our sectors face challenges in attracting and retaining talent in the industry.

One of the key challenges is raising the profile of the industry and its societal purpose. Social Media campaigns can be a good way to promote these trades.

Creating the right conditions for career change will be another crucial element to meet the need for installers and building professionals.

In addition, apprenticeships in the building services sector will ensure better and more energy efficient solutions and installations.

Given the quick pace of technological progress there is a need for promoting life-long learning opportunities and supporting the curricula for vocational education training programmes to address the digital transition. In this context, making companies aware of the need for continuous training will also be key.

Smart Readiness Indicator: a binding and harmonised scheme is needed

As building professionals installing smart building technologies, we believe this common European Union scheme for rating the smart readiness of buildings will be an essential tool in helping raise awareness amongst consumers about the availability and importance of smart building services.

This indicator will help provide consumers with information on the readiness of the building to adapt to the needs of the occupant, to the grid and information to facilitate the maintenance and operation of the building.

While we believe this tool will provide a great benefit for consumers, we regret the missed opportunity of developing a binding and harmonised scheme for the entire European Union. In its current form, the SRI implementation format provides too much flexibility to adapt the calculation methodology to the national conditions. While a certain degree of flexibility is necessary and desirable, **GCP Europe advocates for a harmonised tool in order to support its acceptance amongst consumers and minimise market uncertainties.**

Mandatory minimum energy performance standards

GCP Europe supports the Commission's intention to propose mandatory minimum energy performance standards as part of the revision of the Energy Performance of Buildings Directive (EPBD). However, it will be very important to present these standards as a minimum benchmark that should be exceeded and not as a level to merely meet. In addition, while these minimum requirements should be set at National level, Member States should report on the measures taken in the national energy and climate plans.

Moreover, **performing energy audits should be mandatory for the public sector**. These audits should be accompanied by a timeline to implement the proposed measures as well as a defined energy performance level to be achieved.

Improvements in indoor environmental quality (IEQ) through mandatory minimum requirements

We spend on average 90% of our time indoors and the recent confinement and safety measures have increased this to approximately 98%, further emphasizing the importance of having good indoor environmental quality. Renovation can also improve comfort and sanitary conditions, making buildings healthier and improving wellbeing.

In addition to improving the energy efficiency of the buildings stock, the Energy Performance of Buildings Directive should also target improvements in indoor environmental quality (IEQ) through mandatory minimum requirements.

Access to public funding for renovations should be conditional on improvements in IEQ, as well as the smartness and energy efficiency of the building.

Promoting the uptake of smart buildings and technologies

It is undeniable that digitalisation and technological development will be vital in the decarbonisation of the building stock by enabling functions such as demand-response. At the moment, the definition of a smart building is too broad and there are competing definitions. **We believe that to promote their uptake we need to clearly define "smart buildings" in European legislation, in order to develop workable and concrete objectives.** While smart buildings are closely linked with energy efficient buildings, the distinction is necessary. Furthermore, **smart buildings should not only address the energy consumption of the building itself, but also address its adaptability to the needs of the user, including healthy indoor environmental quality criteria.**

Building technologies will be smarter and more connected to achieve optimal efficiency from an energy, environmental and comfort point of view. Plug-and-play equipment, essentially unserviceable, is growing in numbers. However, the biggest change our sector faces certainly lies in the industry's transition from product-based towards a system approach: versatile systems working with different energy sources and adapting to weather and climate conditions, and more technologically advanced systems integrating artificial intelligence abilities. In this context, contractors' role is crucial by ensuring the proper design, installation and functioning of the plumbing, ventilation, air conditioning, refrigeration and heat pump systems, that satisfy essential societal needs.

The building stock have potential to be an active part of the climate solution through integrating renewable production and renovations that increase energy performance of building but also by increasing flexibility on the demand side of the energy system.

It is important that the Commission addresses how to raise awareness and use of more smart technologies and data to achieve an efficient energy performance of buildings. Today, these technologies exist but are unfortunately not always part of the renovation of existing buildings. Smart technologies that enable buildings to interact with the energy systems and provide data for facility management and service companies will be key elements towards a greener and more digital future.

The Smart Readiness Indicator, by providing a common European Union scheme for rating the smart readiness of buildings, can be a useful tool to help evaluating the share of smart buildings- as well as the level of smartness- in the building stock.

About GCP Europe:

GCP Europe is the voice of the efficient building engineering services. The association represents the interests of 17 member associations in 13 countries in the Building Services Engineering Sector: plumbing and HVAC at the European Union level.

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