

Joint Statement from the Electrical and Mechanical installation sectors on the recast of the Energy Performance of Buildings Directive (EPBD)

February 2022

GCP Europe, the leading representative of mechanical installers in Europe, and EuropeOn, the European voice of the electrical contracting industry, welcome the European Commission's proposal for the recast of the Energy Performance of Buildings Directive (EPBD).

The proposed amendments are a natural development of the legislative act, reacting to the ever-growing importance of energy efficient, clean and smart buildings to achieve the EU's climate and energy objectives

As mentioned in Recital 56 (in force EPBD), contractors have a "critical" role to play in the decarbonisation of buildings thanks to their in-depth knowledge of the installation, maintenance and inspection of electric, heating, cooling, and ventilation systems.

On the matter, we welcome the **introduction of the "National building renovation plans" (NBRPs)** and their increased scope and ambition in comparison to their "Long-term renovation strategies" predecessor. The emphasis on addressing skills and workforce gaps in the construction sector is a good step in the right direction, as our sectors already report difficulties in hiring skilled professionals. However, NBRPs would ideally explicitly include a projection for skills and workforce needs in the roadmaps for 2030, 2040 and 2050, as described in point (b) Annex II.

Especially during the COVID-19 crisis, the shortages of qualified staff and the need for investment in skills became even more evident. With the evolving ambition and targets of the EU, it is highly necessary to have a corresponding support for the role of installers. Without proper design of the respective systems, energy savings of efficient equipment can be totally negated. Therefore, we fully support the proposal aiming at requiring Member States to provide measures and financing to promote education and training to ensure that there is a sufficient workforce with the appropriate level of skills corresponding to the needs in the building, construction, and energy efficiency sector.

Furthermore, the intention to apply minimum energy performance standards (MEPS) to all buildings will tackle the worst performing part of the building stock and assist the citizens in most need.

The Commission's push for more **frequent and encompassing inspections** of heating, ventilation or air-conditioning systems, combined with linking financial aid to building renovation passports (BRPs) and energy performance certificates (EPCs) issued by qualified experts, will also ensure that building HVAC systems operate efficiently and allow for achieving the Union's goals. However, inspection requirements partly miss the mark as they don't include electrical systems and wiring in the requirements for inspections. The latter will become increasingly important as the EU building stock moves towards the new Zero-Emission Building standard, which we welcome.

Besides, the draft Directive has much more potential to **address indoor environmental quality (IEQ)**. Although the Commission touches upon the issue with a provision to support the integration of measuring and control devices for the monitoring and regulation of indoor air quality (IAQ), we believe

that mandatory minimum requirements are a must in order to ensure an IEQ that is beneficial to health and comfort.

Digitalisation and technological development will be vital in the decarbonisation of the building stock by enabling functions such as demand-response and the integration of more energy efficient systems. Despite the positive step that the Commission plans to further strengthen the application of the Smart Readiness Indicator (SRI), we still see the gap of not having a definition for ‘smart buildings’. Although smart technologies and energy efficiency are closely linked, distinct definitions are vital. We believe that a smart building is not only energy efficient, but also should address its adaptability to the needs of the user, including healthy IEQ criteria. We also welcome the new Article 14 on Data Exchange. We consider that the implementing acts under 14(5) should ensure the easy, fair and transparent access to data for all relevant parties, including SMEs, and enable access to real-time data if feasible or at least in sub-hourly time-steps.

Our industry remains committed to help the development of the recast proposal and we look forward to continuing cooperating with the European institutions to help ensure its success.

GCP Europe is the voice of the efficient building engineering services at EU level – heating & cooling, ventilation, air condition and plumbing systems in buildings. With 14 member associations in 12 countries, GCP Europe is a powerful network in this sector in Europe. <https://gcpeurope.eu/>

EuropeOn is the European voice of the electrical contracting industry since 1954. With 1.8 million professionals in over 300.000 businesses and with a turnover of over EUR 200 billion, electrical contractors provide electrical installations for buildings and infrastructure, enabling cities and citizens to take part in the Energy Transition. EuropeOn is campaigning in favour of [Skills4Climate](#) and is part of the [Electrification Alliance](#), the [Platform for E-mobility](#), the [Forum for European Electrical Domestic Safety](#), and the [Construction2050 Alliance](#), among others. www.europe-on.org