



*Raising standards for consumers*

## POSITION PAPER

# ANEC Position on the EC Proposal for a Revision of the Energy Performance of Buildings Directive



**Contact:** Michela Vuerich –  
mvu@anec.eu



ANEC is supported financially  
by the European Union & EFTA



Ref: ANEC-SUST-2022-G-005

15/03/2022

European Association for the Co-ordination of  
Consumers Representation in Standardisation aisbl

Rue d'Arlon 80 – 4th Floor - B-1040 Brussels, Belgium  
T: +32-2-7432470 / anec@anec.eu / www.anec.eu

# Introduction

---

ANEC recognises improvements have been made in the [EC proposal for revision of the Energy Performance Directive COM\(2021\)802](#) compared to the current text. However, there are still several points where we believe more ambition is required to effectively boost renovation of buildings in the EU, lower CO<sub>2</sub> emissions, and achieve more energy savings. We address the key issues below, against the background of the [ANEC position](#)<sup>1</sup> we developed as a contribution to the Impact Assessment.

## 1 | Targets and timelines

---

The overall target has not changed compared to the current one: zero emission stock by 2050, and a decarbonisation objective of 55% of less greenhouse gas emissions by 2030 compared to 1990 levels.

Considering the latest discussions on climate change mitigation the overall ambition of this target is questionable. The timeline for zero emission stock needs to be shortened, otherwise we risk missing the 1,5°C (2,0°C respectively) limit.

## 2 | Building Renovation

---

The prolongation of the lifetime of a building to avoid environmental burdens needs to be considered, but this should be dealt with outside the EPBD.

There are quite a few options to hand that avoid the demolition of buildings (i.e. change of use, refurbishment, upscaling) and other options for the End-of-life phase (i.e. Design for disassembly, re-use of building products/components, upcycling etc).

To this end, the consideration of grey energy within the new proposal (energy embodied in the building construction by production, transport and erection of the building fabric and envelope) is highly appreciated. Consequently, the total content of grey energy of new buildings should be restricted.

The target to renovate the worst 15% of the building stock to meet the F class by 2030 (and the E class by 2033 respectively) is not ambitious. From an economic perspective (i.e. saving initial investment costs), it is understandable. From the environmental point of view, however, the energy and mass-flows for renovation, plus the additional energy use during 20 years until 2050 of the "semi-renovated" building, should be avoided.

Also, the new proposal gives room for manoeuvre with respect to the national building renovation plans. These plans should be combined with tough requirements for targets on renovation rate and energy class to be achieved once renovations are carried out. We emphasise that the intended flexibility for adaptation to national and local conditions of the EPBD has to be kept to a minimum to avoid more

---

<sup>1</sup> [ANEC 2021 Position on the Revision of the Energy Performance of Buildings Directive – IIA Roadmap](https://is.gd/Hcejtg), (<https://is.gd/Hcejtg>)

inconsistencies in the reliability and comparability of environmental information for buildings.

We also support the recommendation made by some MEPs for a zero emissions standard by 2025.

Why should we give ourselves until 2030 until all new buildings are zero emission? Even allowing time for design and construction, we believe zero emission should be possible by 2025 for all new buildings (public and private). This also applies to the calculation of the Global Warming Potential over the entire lifecycle of the building. Moreover, for deep renovation of existing buildings, the timeline for zero-emission could also be shortened to 2025.

### 3 | Consideration of specific ANEC recommendations<sup>2</sup>

---

- Energy Performance Certificates

In the proposed revision, these can still be use-based or issued on the basis of calculated energy demand (which is the only valid way to judge the energetic performance of the building, not on use patterns of its inhabitants). We still plea for calculated EPCs only.

The differentiation between a (reduced) set of requirements and options is a good idea, and we also support the idea of databases (for EPC and renovation passports likewise).

However, care must be taken with respect to the exchangeability of data formats. This is an evident requirement, but we experience quite frequently that different countries, regions and even cities, tend to follow their own paths rather than agreeing beforehand on a common data exchange format. Article 14 deals with this issue (and notably also with the costs of data access) but - if there is no EU-wide specification - we fear there will be fragmentation and confusion again.

- Renovation passport

Furthermore, the idea of a renovation passport is voluntary and generally accompanied by the smart readiness indicator.

In contrast, we propose to convert the building passport into a tool to combine energy savings and circular economy principles. This could be done by giving an overview of the energy-related renovation measures made, and documenting where in the building which building material was installed and how (e.g. glued, dowelled).

---

<sup>2</sup> ANEC 2021 Position on the Revision of the Energy Performance of Buildings Directive – IIA Roadmap, (<https://is.gd/Hcejtg>)

- Smart readiness indicator

Moreover, at the moment, the smart readiness indicator seems to be more a marketing instrument, which makes building owners and users aware of the benefits of building automation and the electronic monitoring of technical building systems. Even though monitoring of the basic functions of the technical building equipment is useful, these types of monitoring (and inspections) should be obligatory for new buildings (in which case there is no need for the indicator). For existing buildings, the “upgradeability” to smart functions depends on the electrotechnical infrastructure present. This check is possible only on site, so there is no need to create an indicator when the actual technical framework is known.

- Energy generation

The proposal for revision takes into account the issue of energy generation on site (asking for bidirectional charging) which also includes energy storage. We fully support this idea.

- Energy poverty

We welcome the attention to the needs of vulnerable consumers with the introduction of financial measures. Indeed, we recommend a political and financial framework be developed to ensure affordable energy is available to vulnerable consumers. Also, legal obstacles need to be considered (e.g. simplifying the decision making on energy efficiency for the owners in a building; offering economic advantages to landlords to improve the energy performance of their rental properties; ensuring legal limitations on rent increases).

## CONCLUSIONS

---

In conclusion, there is a need to act urgently and boldly on climate change. Time is of the essence. This can be done by not only improving the energy efficiency of buildings, but also by phasing out use of fossil fuels and encouraging the generation of renewable energies on site (e.g. through the use of solar panels). Against this background, the EU climate targets can be supported through the EPBD revision by boosting the renovation rates in a manner that is truly suitable for the environment and (vulnerable) consumers.



European association for the coordination of  
consumer representation in standardisation aisbl

Rue d'Arlon 80 – 4th Floor  
B-1040 Brussels, Belgium

+32 2 743 24  
70  
@anectweet  
anec@anec.eu

EC Register of Interest Representatives:  
Identification number 507800799-30  
BCE 0457.696.181

ANEC is supported financially by the European Union & EFTA

This document may be quoted and reproduced, provided the source is given.  
This document is available in English upon request from the ANEC Secretariat  
or from the ANEC website at [www.anec.eu](http://www.anec.eu) © Copyright ANEC 2022

