Formerly BING

Recast of Directive 2002/91/EC
Second reading position of the European Parliament
- Focussing on key elements-

PU Europe – formerly BING - warmly welcomes the first reading position of the European Parliament on the recast of the Energy Performance of Buildings Directive (2002/91/EC).

The Parliament has shown true ambition and provided a long-term legal framework for the low-energy future of buildings. The first reading text provides the European Union with a powerful tool to combat climate change and bring much-needed new impetus to the COP 15 negotiations starting on 7th December.

The Union's credibility would indeed suffer if new building legislation was adopted in a half-hearted way on the day of the conference start. This would be in contradiction to the daily statement citing buildings as the largest energy using sector and the one with the highest cost efficient savings potential. The International Energy Agency (IEA) estimates at 70-75% the long-term energy savings potential for new build and this without additional costs or with very limited additional costs for owners. The total feasible potential for energy savings by renovation and refurbishment is estimated at 55-80% depending on the building type and region[1].

Amongst the many important amendments adopted by the Parliament, some appear to have a particular potential to stimulate efficiency gains, reduce the EU's greenhouse gas emissions and, hence, support the goals of the COP15 negotiations. PU Europe strongly believes that the following three key proposals must be included in the final text:

Very low energy buildings:

All Member States must put in place **binding pathways towards** "**very low energy buildings**" for both new and existing buildings. All **new** buildings must meet very low energy demand levels from a certain date onwards. In addition, national building codes must include targets for the energy efficiency upgrades of existing buildings. The definition of "very low energy building" must be based on the *Trias Energetica.*

Reasons

Several countries (D, DK, F, FIN, IRL, N, NL, UK) have already introduced binding roadmaps towards very low / zero energy buildings. Similar construction techniques and products are available across Europe. Hence, there is no reason why other Member States should continue to invest in buildings which will remain far from the state-of-the-art and well below cost-optimal levels for the decades to come.
Furthermore, moving from niche to mass markets will stimulate innovation and allow for economies of scale.

[1] Energy Efficiency Requirements in Building Codes, Energy Efficiency Policies for New Buildings - In Support of the G8 Plan of Action - OECD/IEA, March 2008

FEDERATION OF EUROPEAN RIGID POLYURETHANE FOAM ASSOCIATIONS
Av. E. Van Nieuwenhuyse 6 • B-1160 Brussels
T +32 2 676 73 52 • F +32 2 676 74 79 • TVA BE 0870 426 629
www.pu-europe.eu • secretariat@pu-europe.eu

Minor refurbishment and component requirements

All Member States must establish **minimum efficiency requirements for building envelope components** such as walls, roofs, windows etc. Whenever a building envelope component is replaced / largely refurbished (**minor building renovation**), the energy efficiency of that component must be increased to meet these minimum efficiency requirements.

Reasons

"A chain is as strong as its weakest link". Hence, a holistic view on the building is impossible without looking at all systems and components. Furthermore, most renovation works are not "major renovations" and usually cover only one component or system (windows, roof, boiler). These parts are usually installed for a period of 15 to 35 years. If low efficiency solutions are chosen, energy will be wasted for several decades.

At least ten Member States have put in place minimum performance requirements for envelope components. They are complementary to integrated methods for calculating the building performance.

1000 m^2 threshold for existing buildings that undergo major renovation

PU Europe fully supports the proposal Commission and the Parliament to fully abolish this threshold. It is encouraging to see that Member States seem to accept this.

Reasons

Only 1-2 % of the building stock is replaced annually. Hence, most energy savings must come from existing buildings. The current EPBD excludes 72 % of the building stock in spite of their huge savings potential. For existing buildings, the economically best moment to invest in efficiency is when they undergo renovation. This opportunity must be seized for all buildings independently from their size.

Apart from these top priority points, PU Europe can reaffirm its full support for other important amendments which should be included in the final text:

- Requirement for Member States to introduce financial support schemes;
- Public buildings with energy performance certificate: implement cost-optimal recommendations by the end of the certificate's validity;
- New / existing public buildings: Low energy targets three years in advance;
- From June 2012, no incentives for works (including components) which do not meet minimum energy performance requirements;
- Energy performance: Indicator based on primary energy demand;
- EC to adopt guidelines by June 2010 on harmonised content, language and presentation of EPCs (mutual recognition);
- Voluntary EU-wide energy performance certificate for commercial buildings by 2011;
- EC to develop a common calculation methodology for the energy performance of buildings, to be applied by June 2015.

Brussels, 17 September 2009