



European Energy Network

A voluntary network of European energy agencies



*"Making the renovation wave happen through the new
Energy Performance of Buildings Directive"*

Stakeholder consultation - Revision of the Energy Performance of Buildings
Directive (EPBD)
12/04/2022 10:30-13:00

EnR views and proposals on the
directive

Rui Fragoso, ADENE & EnR Buildings WG Chair



EnR - European Energy Network

- **Voluntary network** established in 1990.
- Gathers **24 national energy agencies in Europe**.
- **Promotion of EE and RE policies**, programs and national or European initiatives.

EnR Troika Plus 2022



Agência para a Energia



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General remarks



1. The EnR network congratulates the EC initiative **for a recast of the Energy Performance of Buildings Directive**, in the framework of the Fit for 55% Package.
2. Buildings are a **key sector to the EU decarbonization**. Deploying highly efficient new buildings and renovating the existing ones is a **complex but necessary task**.
3. The **multiple benefits** that arise from **energy efficiency measures** are multiple and **long lasting**, from energy and costs savings, energy security and independency, improved quality of life and well-being, health, productivity of occupants, among others for families, enterprises and governments
4. **Energy agencies can play an important role in supporting the whole building transformation** due to their intersectoral and multidisciplinary expertise, impartiality, capacity and capillarity and support at local and national level.

Specific remarks



Zero Energy Buildings (ZEB)

- ✓ The EnR **welcomes this new standard** as a target for new buildings starting 2027/2030 and an aim for whole by 2050.
- ✓ As ZEB are buildings with zero carbon emissions from fossil fuels it's important to guarantee that the **(low) renewable energy consumed can clearly be sourced locally, from district or the grid** considering the diversity of systems from each MS and **aligned with local storage** systems when need.

EnR → Energy systems perspective specifically on centralized vs decentralized renewable elec. production

LTRS to NBRP

- ✓ Building on the existing LTRS to NBRP with a **harmonized template is an added value and welcomed**.
- ✓ Clear **links with MEPS and ZEB** make it easier to **understand approaches my MS and “compare” NBRP**.
- ✓ EnR welcomes an **updated guideline from the EC to support NBRP**
- ✓ NBRP – **starting point for more long-term political decisions** promoting an **increased renovation rate and energy efficiency in existing buildings** (political processes differ in MS' that might constitute obstacles)

EnR → Energy agencies are involved and supporting the implementation and monitoring of LTRS



Cost-Optimal calculations update

- ✓ The EnR welcomes an **updated methodology** where **not only energy and emission** are considered but also “*environmental and health externalities of energy use, and disposal waste management costs, where applicable*”
- ✓ The EnR welcomes a **revised framework from the EC by 30/June/2026**

EnR → Energy agencies support National Authorities with data and expertise developing national cost-optimal calculations

Minimum Energy Performance Standards (MEPS)

- ✓ The EnR welcomes the **introduction of MEPS**. Starting with the **worst performing (F and G)** is a good approach.
- ✓ The necessary **support is need** (awareness, technical and financial) is key to achieve good implementation).
- ✓ Some **flexibility will be needed** within MS' as to timeframe and included buildings.

EnR → Awareness, technical and financial support are among the most relevant actions developed by energy agencies

Infrastructure for sustainable mobility

- ✓ **Recognizing the role of EVs in buildings, smart charging** and, where appropriate, **bidirectional charging** could open future services for homeowners and companies.
- ✓ **Reenforcing the EV charging points infrastructure** is positive.
- ✓ “Ready to plug” will meet **legal challenges** in some MS, where charging stations cannot be installed as easily adene

Smart Readiness Indicator (SRI)

- ✓ SRI could be an opportunity to **incentivize digitalization and smart services** in buildings, and emphasizes buildings as a **part of the energy system** and the **possibilities of flexibility**.
- ✓ It's prudent to make it **mandatory for only for big non-residential** and incentivize **synergies with the issuing of an EPC** to reduce cost and extra burden.

Building Automation and Control (BAC)

- ✓ Recognize the **relevance of BAC in managing energy in buildings and promote savings**.
- ✓ Reducing the 290kW threshold to 70kW should be **carefully evaluated** and allow buildings to be **exempted** if not feasible or cost-effective.

Energy Performance Certificates (EPC)

- ✓ **+60% MS** have already A-G scales.
- ✓ **Harmonizing label scales** (and not PE limits, which differ by MS) is positive but will introduce extra burden in MS that rely on other scales. Nevertheless, this is a good **alignment for MEPS**

EnR ➔ Many energy agencies manage the EPC schemes or have direct support to it nationally.

Renovation passport (RP)

- ✓ Important tool to **complement the EPC**. RP can play a **role of improving the EPC recommendations**.
- ✓ Delegated act - Necessary **flexibility** between the **complementarity or integration of RP into EPCs**.

EnR ➔ Agencies will support scheme deploy. Some involved in Horizon projects dealing with RP



Disclosure of the Global Warming Potential (GWP)

- ✓ The EnR welcomes the introduction of this indicator as a further looking into the lifecycle of buildings. Invites the EC to provide further guidance on its calculation.

Data exchange and Databases for EPCs

- ✓ The EnR welcomes further exploitation of data. The EPC DB have huge amounts of data than can support policies and the market.
- ✓ Making EPC and its data widely available (homeowners, managers, tenants and 3rd parties, when authorized) is welcomed. Data available both individual and aggregated is need to support different needs.
- ✓ Further guidance on interoperability and transfer to the BSO is welcomed.

Financial incentives and market barriers

- ✓ Key provision to enable building stock transformation.
- ✓ Technical assistance, awareness, different funding and tools are needed.
- ✓ Linking financial measures with energy performance is a good approach.
- ✓ EPC and BP are good tools to guide and validate investments

EnR → Energy agencies have experience in providing technical assistance to several stakeholders. Some energy agencies directly manage financial schemes



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Thank you

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rui.fragoso@adene.pt