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Eurovent feedback on third EPBD stakeholder workshop

In a nutshell

In the below, Eurovent provides its feedback following the third stakeholder workshop for the revision of the EPBD. In short:

- **Include a mandatory IEQ indicator in the EPC**
- **Improve quality control**
- **Require Member States to set up publicly available EPC databases**
- **Ensure sufficient harmonisation of the EPC framework at EU level**

Indoor environmental quality (IEQ)

Eurovent holds that the EPC should include a mandatory IEQ indicator and that IEQ aspects should be included in the EPC recommendations.

IEQ and energy efficiency are tied at the hip. The provision of healthy and comfortable indoor spaces is why we build buildings in the first place and why we spend energy on them. IEQ metrics would show whether energy in buildings is spent *well*. IEQ metrics can also help make the health and productivity co-benefits of energy efficiency renovation explicit for owners and tenants and help create buy-in.

The EPC is the main information tool available to owners and tenants – it is accessible and easily understood. Examples abound of how an IEQ indicator could be successfully integrated into the EPC. These should be examined.

Smart Readiness Indicator (SRI)

The smartness of technical building systems has the potential to make significant contributions to both energy efficiency and IEQ. Measures aimed at encouraging smartness, like including an SRI rating in the EPC, would therefore be very welcome in principle.

That said, the introduction of the SRI as it stands is leading to fragmentation of the market: Member States may choose to make use of it or not and may even choose to adopt a different methodology altogether than the one proposed in the delegated acts. The SRI should be much better harmonised before being linked to the EPC.

Quality control

The quality of EPC should be improved. Too many EPC in the EU do not represent accurate appraisals of actual or measured energy consumption and there are persistent problems with data consistency and the repeatability of assessments. This decreases trust in the system and reduces the utility of EPC for occupants, owners, and investors. The review of the EPC framework should lead to measures that would improve the quality, usefulness, coverage, and comparability across the EU of EPC and energy audits.

The sampling requirements for independent quality control should be strengthened so that more EPC are checked. Furthermore, Member States should put in place complaint mechanisms for owners and tenants, with complaints also leading to independent quality control. Cases of non-compliance

identified during quality controls should face adequate remedies and penalties, from correction of the assessment to repeal of certification in case of repeated errors.

Requirements on the training and evaluation for EPC assessors should also be strengthened. Best practices among Member States in the development of educational standards should be identified. The establishment of an EPC should in all circumstances require at least a visit to the building.

Coverage remains low and EPC can go a very long time without being renewed. There should be more trigger points for establishing a new EPC and the validity period should be reduced from 10 years to 5 years.

National databases

Eurovent supports setting up national EPC databases which are publicly accessible. These would ensure the availability of data for independent research, which in turn would help improve future energy and renovation strategies, regulations, and standards. The databases could also facilitate first-approximation compliance checks with building codes. In several Member States, these databases also link to the regular system inspection schemes. There are strong synergies between energy audits and regular inspections, data for which could be collected during a single building visit. The resulting recommendations could be stored in a common database.

Harmonisation

Eurovent strongly supports increased harmonisation of EPC and underlying calculation methodologies between Member States. The current EPBD provides too much leeway for national and regional models and definitions, which are proliferating. This fragmentation has rendered comparisons between Member States impossible: different national methodologies applied to the very same building under the same conditions lead to very different energy performance ratings. Deep harmonisation would:

- Enable better synergies with EU product-level legislation, including Ecodesign
- Enable economies of scale and the standardisation of renovation solutions
- Reduce uncertainty and administrative burdens
- Facilitate comparisons and benchmarking
- Avoid loopholes, especially important if linked to MEPS

Eurovent and transparency

When assessing position papers, are you aware whom you are dealing with?

Eurovent's structure rests upon democratic decision-making procedures between its members and their representatives. The more than 1.000 organisations within the Eurovent network count on us to represent their needs in a fair and transparent manner. Accordingly, we can answer policy makers' questions regarding our representativeness and decisions-making processes as follows:

<p>1. Who receives which number of votes?</p> <p>At Eurovent, the number of votes is never determined by organisation sizes, country sizes, or membership fee levels. SMEs and large multinationals receive the same number of votes within our technical working groups: 2 votes if belonging to a national Member Association, 1 vote if not. In our General Assembly and Eurovent Commission ('steering committee'), our national Member Associations receive two votes per country.</p>	<p>2. Who has the final decision-making power?</p> <p>The Eurovent Commission acts as the association's 'steering committee'. It defines the overall association roadmap, makes decisions on horizontal topics, and mediates in case manufacturers cannot agree within technical working groups. The Commission consists of national Member Associations, receiving two votes per country independent from its size or economic weight.</p>
<p>3. How European is the association?</p> <p>More than 90 per cent of manufacturers within Eurovent manufacture in and come from Europe. They employ around 150.000 people in Europe largely within the secondary sector. Our structure as an umbrella enables us to consolidate manufacturers' positions across the industry, ensuring a broad and credible representation.</p>	<p>4. How representative is the organisation?</p> <p>Eurovent represents more than 1.000 companies of all sizes spread widely across 20+ European countries, which are treated equally. As each country receives the same number of votes, there is no 'leading' country. Our national Member Associations ensure a wide-ranging national outreach also to remote locations.</p>

Check on us in the [European Union Transparency Register](#) under identification no. 89424237848-89.

We are Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies – thinking 'Beyond HVACR'

Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn EUR, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level playing field for the entire industry independent from organisation sizes or membership fees.

Eurovent's roots date back to 1958. Over the years, the Brussels-based organisation has become a well-respected and known stakeholder that builds bridges between the manufacturers it represents, associations, legislators and standardisation bodies on a national, regional and international level. While Eurovent strongly supports energy efficient and sustainable technologies, it advocates a holistic approach that also integrates health, life and work quality as well as safety aspects. Eurovent holds in-depth relations with partner associations around the globe. It is a founding member of the ICARHMA network, supporter of REHVA, and contributor to various EU and UN initiatives.

Delivery annotation

Recipient	epbd-impact-assessment@trinomics.eu
Concerns	Third stakeholder workshop on the revision of the Energy Performance of Buildings Directive