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Eurovent feedback on first EPBD stakeholder workshop

In a nutshell

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

- **Much more attention should be paid to health and wellbeing aspects.**
- **The EPBD must be made to deliver on the renovation wave objective.**
- **More harmonisation at the EU level is required.**
- **Synergies with the Ecodesign framework should be ensured.**

General feedback

The primary function of most buildings is to enable safe human occupancy. A singular focus on decarbonisation risks detracting from the wellbeing of people inside buildings, a concern which has crystallised during the COVID-19 pandemic.

Eurovent holds that much more focus should be placed on indoor environmental quality (IEQ) and health aspects in the review. The EPBD has the potential to help achieve the dual aim of both healthier and more energy efficient buildings, leveraging the synergies between the two. A dedicated stakeholder workshop on IEQ should be convened for this purpose.

New metrics for long-term decarbonisation

Besides decarbonisation metrics, the framework should include metrics related to IEQ, comfort, health, and wellbeing of building occupants. Investing in building renovation can pay off not just in terms of energy savings, but in health and productivity gains as well, provided sufficient attention is paid to IEQ aspects. Finding ways to make these pay-offs explicit for owners and tenants would underscore the co-benefits of energy efficiency renovation and help create buy-in.

In this way, considering IEQ in the context of the Renovation Wave might also provide additional incentives for deep renovations. The best time to install, for example, a ventilation system that adequately delivers on IEQ is during structural refurbishment of the building. IEQ objectives could help drive deep renovations. On the other hand, a deep renovation in which IEQ objectives are not considered or achieved is a massive missed opportunity.

Prioritised EPBD provisions to be revised

The EPBD contains a wide array of complementary provisions, each designed to achieve specific objectives. Altogether, these are supposed to work in concert towards the overarching aim of decarbonising the building stock by 2050. To strengthen the EPBD and mainstream IEQ considerations, each and every provision will need to be thoroughly evaluated.

LTRS

The LTRS should aim at 100% GHG emissions reduction by 2050 and an intermediary target of 60% by 2030. They should link together with National Energy and Climate Plans and the comprehensive assessments of the potential for energy efficiency in heating and cooling (Art.14 EED). The current requirements on the LTRS (article 2a) should be better enforced, especially with regards to the

mandatory national public consultation. The European Commission could further improve its guidance to Member States and encourage best practice, to make sure that LTRS are timely submitted, complete, and sufficiently ambitious.

EPB calculation models

The goal of decarbonising the building stock across the EU can be better achieved using harmonised models, calculation methodologies, and definitions. 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 performances.

Better harmonisation and comparability would reduce uncertainty, lower administrative burden, and enable economies of scale and the standardisation of renovation solutions for industry stakeholders. Better harmonisation of calculation methodologies is also required to improve the EPC and to enable better synergies with EU product-level legislation, including the Ecodesign framework (see below).

MEPS

The phased introduction of EU-wide mandatory minimum energy performance standards (MEPS) would be effective at overcoming barriers to renovation if combined with proper funding, guidance, and enforcement mechanisms. Eurovent supports this initiative and looks forward to engaging with the review study team and other industry stakeholders on this subject at the next workshop.

Minimum requirements for technical building systems.

Eurovent strongly supports introducing new minimum requirements related to IEQ for technical building systems (article 8).

EPC

A thorough review of the framework for EPC is required. 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 approach to EPC must be harmonised across Member States, especially if the EPC are to form the basis for a MEPS system. The proliferation of national and regional EPC makes comparisons and standardisation difficult. The review should lead to measures that would improve the quality, usefulness, coverage, and comparability across the EU of EPC and energy audits. Requirements on the training and evaluation for EPC assessors should also be strengthened.

Furthermore, the EPC should include a mandatory IEQ indicator, which could be based on EN 16798-1. Examples of how such an indicator could be successfully integrated into the EPC exist and should be examined (see for example ALDREN-TAIL).

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 are therefore very welcome.

That said, the introduction of the Smart Readiness Indicator (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 harmonised.

Financial incentives

To deliver on the EU's renovation ambitions, innovative ways must be found to unlock much more funding earmarked for energy efficiency improvements in building, from both public and private sources. Investing in building renovation can pay off not just in terms of energy savings, but in health and productivity gains as well, provided sufficient attention is paid to IEQ aspects. Eurovent therefore suggest revising article 10 paragraph 6 to link financial measures to improvements in IEQ.

System inspections

Regular inspections of a technical building system help ensure that it continues to work as closely as feasible to the intent of its design over the course of its lifetime. It also allows to assess when the design no longer suits the evolving needs of the building. In this way, inspections and the recommendations that follow from them help not only optimise the energy performance of the system but also its contribution to IEQ.

Requirements should be included in the reviewed EPBD for mandatory inspections of stand-alone ventilation systems, based on the results of the feasibility study foreseen under article 19a. System inspection and reporting requirements should be amended to include IEQ aspects and IEQ improvement objectives.

Information requirements

The information requirements of Member States towards owners and tenants stipulated in article 20 are a great way to help raise awareness and overcome barriers to renovation. Here again, IEQ objectives should be included, to help owners and tenants develop an explicit appreciation of IEQ and the co-benefits of building renovation.

Cost-optimal framework

IEQ aspects should be included in the cost-optimal framework as well.

Linkages to other legislative measures

Ecodesign

The review should consider how to enable robust synergies between building-level requirements under the EPBD and product-level requirements developed within the Ecodesign framework. Thanks to the Ecodesign framework, products meant to be integrated into technical building systems marketed in the EU already meet minimum performance requirements. The EPBD should ensure that these Ecodesign-compliant products find their way into new and existing buildings. Ecodesign product performance data should fit seamlessly in the EPB calculation methodologies. This would notably require that the flexibility that is allowed to Member States for transposition should be revisited, and convergence towards a harmonised European calculation model based on the EN standards developed for that purpose should be encouraged.

Better synergies between the EPBD and Ecodesign, harmonised at the EU level, would enable additional energy savings. Several Ecodesign measures on space heating, space cooling, and ventilation equipment are being reviewed with a focus on the energy savings potential at the system level. That is to say, the review studies are investigating the interaction between the product and the technical building system, and the ability to adjust the product performance to system needs. Given that IEQ is the main determinant for product design and dimensioning, the lack of harmonised IEQ

requirements at EU level hinders improvement of Ecodesign requirements. A good example of this is the ongoing revision of the Ecodesign Regulation for ventilation units ((EU) No 1253/2014). The review study identified significant energy savings potential at the system level in IEQ-related ventilation performance. The lack of EU-wide ventilation requirements makes it difficult to tap into this potential through Ecodesign.

Air quality

The EPBD has a role to play not just in the transition to a carbon-neutral economy but to another headline objective of the European Green Deal as well, namely the Zero Pollution ambition.

In its resolution on the review of the Ambient Air Quality (AAQ) Directives, the European Parliament recently concluded that the European Commission should regulate Indoor Air Quality (IAQ) as a part of sustainable buildings legislation. The report rightly recognised that tackling air pollution requires a comprehensive approach that goes beyond ambient air quality and emissions control legislation, because a lot of air pollution is not anthropogenic, and the most concerning air pollution is indoors. The EPBD is the only existing piece of EU legislation that could accommodate IAQ requirements. By mainstreaming IAQ and IEQ considerations into the review, the EPBD can play a direct role in reducing building occupants' level of exposure to indoor air pollution.

Moreover, the review of the EPBD should also explore the synergies between air quality and decarbonisation. Most air pollution comes from the combustion of fossil fuels. Insofar as the EPBD contributes to the deployment of renewable energy, energy efficiency, and electrification of end-uses, it would result in air quality improvements as well.

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:

1. Who receives which number of votes? 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.	2. Who has the final decision-making power? 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.
3. How European is the association? 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.	4. How representative is the organisation? 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.

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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.