



EUROPEAN ALLIANCE TO
SAVE ENERGY
Creating an Energy-Efficient Europe

HE Mr KERR Neil
Ambassador
Deputy Permanent Representative
Permanent Representation of Malta

Bruxelles, 20 June 2017

Dear Ambassador Kerr,

Re: European Alliance to Save Energy views on the current position of the Maltese Presidency on the Energy Performance of Building Directive (EPBD) revision

We understand that on June 26, the Council will probably agree on a general approach on the EPBD while it will be not possible to reach an agreement on the EED.

We would like to express our concern regarding this situation and in particular regarding the risk of a an agreement on a very weak EPBD text which waters down the Commission's proposal, fails in putting existing buildings at the centre of the EU's energy transition, does not set a clear and coherent EU 2050 pathway towards a highly efficient and decarbonized building stock and does not ensure any meaningful improvement on technical building systems.

In addition the current EPBD text misses the opportunity to link with the EDD at the expense of the overall coherence of the future European energy efficiency regulatory framework.

In this perspective, we are ready to offer our support to make sure that European businesses and investors will get the much needed ambitious revision of the EPBD.

We have identified 3 main areas that should be enhanced:

1. **The EPBD must be aligned and coherent with a cost-effective EU energy efficiency target:** the EPBD should also head towards achieving an overall binding 40% energy efficiency target. This level of ambition is pivotal for the EU to deliver on the Paris Agreement and ensure the expected savings alongside health, energy security and jobs benefits. This ambition is based on in-depth evaluation of the aggregated savings potentials in key sectors, notably buildings and transport, and is entirely feasible under current market conditions with existing technologies.
2. **Further strengthening of ambitious national long-term renovation strategies:** the EPBD should link and clarify the contribution of these strategies to the achievement of the EU 2030 target for energy efficiency. In this sense, we would fully endorse the requirement to Member States to shape comprehensive and ambitious building renovation strategies, and to make clear their contribution to the achievement of the EED target.

We encourage you to support and consolidate these strategies by:

- Reinforcing the national renovation strategies with a focus on worst performing buildings, the addition of trigger points, a new milestone set at 2040 and the clarification that the 2050 final goal is to ensure a highly energy efficient and decarbonised building stock (in line with the correct implementation of the Efficiency First principle).
- Plan renovation strategies in terms of district and entire energy systems to reap the full potential of high-efficiency energy demand and supply solutions and achieve energy efficiency gains throughout the entire energy chain. By doing so, renovation strategies will also achieve synergies in terms of possible use of waste heat, and integrations of various part of energy systems (heat, electricity, buildings and transport) adding to potential energy gains.
- Have a differentiated approach and targets for buildings categories to consider cost-competitiveness and streamline the mobilization of financing. They should also make room for energy performance services and contracts that can contribute towards significant energy savings with little to no capex in short periods of time.
- Foster Building Renovation Passports as tools to accelerate and support ambitious, coordinated step-by-step building renovation.

3. **Optimising Technical Building Systems:** the current EPBD text is missing meaningful improvements for provisions related to technical building systems that would fully embrace the cost-effective potential for energy management at building level through building automation, control, monitoring, management systems and built-in lighting. Notably, strengthened articles 8.5, 8.6, Article 14 and Article 15 are critical to ensure appropriate adjustment and control of technical building systems. In order to accelerate renovation and enable buildings' connectivity to the energy system, key functionalities shall be prescribed in non-residential buildings over 250 MWh/a and in residential buildings with central technical building system of over 100kw power. Additionally, appropriate control functionalities in individual rooms are needed in particular in those residential buildings.

Further details on our positions concerning both the Energy Efficiency Directive (EED) and the Energy Performance of Buildings Directive (EPBD) are included in our [Position Papers](#).

Yours sincerely,



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About the European Alliance to Save Energy (EU-ASE)

EU-ASE was established in December 2010 by some of Europe's leading multinational companies. The Alliance creates a platform from which our companies (1E, Danfoss, Ingersoll Rand, Kingspan, Knauf Insulation, Oracle Utilities, Philips Lighting, Schneider Electric, Saint-Gobain, Siemens and Veolia) can join with politicians and thought leaders to ensure the voice of energy efficiency is heard from across the business and political community.

EU-ASE members have operations across the 28 Member States of the European Union, employ over 340.000 people in Europe and have an aggregated annual turnover of €115 billion.

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