



EUROPEAN ALLIANCE TO  
**SAVE ENERGY**

*Creating an Energy-Efficient Europe*

# Recommendations on compromise amendments on EPBD revision

By the European Alliance to Save Energy  
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## EUROPEAN ALLIANCE TO SAVE ENERGY

*Creating an Energy-Efficient Europe*

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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Find out more about the European Alliance to Save Energy (EU-ASE)

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# BACKGROUND, RATIONALE AND KEY ASKS

## BACKGROUND AND RATIONALE

- The analysis of amendments (AMs) and compromise amendments (CAs) tabled by MEPs on the revision of the Energy Performance of Buildings Directive (EPBD) has been carried out against the priorities and policy recommendations agreed by the European Alliance to Save Energy (EU-ASE) in its **Position Papers** [published](#) in March 2017.
- The present text highlights AMs and CAs that EU-ASE recommends supporting, opposing or improving in view of ITRE Committee vote expected on Wednesday 11 October.

## KEY ASKS

### Clean Energy Package for All Europeans (CE4All)

- Unique opportunity for the EU to show leadership and consistency on the implementation of the Paris Agreement.
- High ambition is needed both for energy efficiency (EE) and renewables (RES), but in view of a proper application of the Energy Efficiency First principle - through ambitious EED/EPBD reviews - EE can be boosted to achieve 76% GHG emissions cuts in 2030 in the EU.
- EED/EPBD reviews are the opportunity to give confidence to business by delivering the legislative framework capable of unlocking finance.

### EED

- Keep the binding nature of the EU target to strengthen investor confidence and increase its level of ambition to a cost-effective 40% by 2030.
- Support the extension beyond 2020 of the 1.5% national savings obligation; promote consistency in designing obligation schemes or alternative measures (removing loopholes/exemptions).

### EPBD

- Set an ambitious, reliable and coherent EU framework for the definition of national long-term renovation strategies and ensure a reliable implementation. This is why we support the definition outlined in CA5a.
- Unlock the needed private investments in the building sector.
- Promote Smart Buildings, encourage the deployment of smart technologies and optimisation of technical building systems.

## REVISION OF THE ENERGY PERFORMANCE OF BUILDINGS DIRECTIVE (EPBD)

Here below a selectin of key AMs and Compromise AMs with relative expression of EU-ASE position and justification.

TOPIC	ITRE COMPROMISE AMENDMENTS	ENVI AMENDMENTS	EU-ASE RECOMMENDATIONS	JUSTIFICATION of EU-ASE RECOMMENDATION
Definition TBS	<b>1</b>		SUPPORT	We suggest to support this new comprehensive definition with an enlarged spectrum of technologies
Definition Trigger Points	<b>2</b>		SUPPORT	We suggest to support this new comprehensive definition
Definition Building Renovation Passport	<b>3</b>		SUPPORT	We suggest to support this new comprehensive definition
Definition BACS	<b>4</b>		SUPPORT	We suggest to support this new comprehensive definition
Definition Decarbonized building stock	<b>5a</b>		SUPPORT	We suggest to support this new satisfactory definition, in particular its 2050 perspective
Long-term renovation strategies	<b>6</b>		SUPPORT	We suggest to support this enriched content of national renovation strategies compared to the Commission's proposal: inclusion of a 2050 objective, a differentiation of building typologies, the addition of trigger points, worst performing buildings should be targeted first, the role of public buildings and education, the establishment of stakeholder platforms. In addition, cost-effectiveness should always prevail in assessing the choice of measures in staged deep renovation
Milestones in renovation strategies	<b>7</b>		SUPPORT	We suggest to support the addition of a 2040 milestone to the 2030 one and "measurable progress indicators"
Contribution of renovation strategies	<b>8</b>		SUPPORT	We suggest to support that Member States shall specify how milestones in national renovation strategies contribute to 2030 EE target and 2050 GHG target

Financing	<b>10</b>		SUPPORT	We suggest to support the establishment of investment platforms for the aggregation of projects, a consistent alignment with the Smart Finance for Smart Buildings initiative and with the positive evolutions on the Eurostat accounting rules, the establishment of project development assistance and one-stop-shops, a link with Building Renovation Passports
Best practices on financing schemes	<b>10a</b>		SUPPORT	We suggest to support the role of the Commission in collecting and disseminating successful renovation schemes and information sharing on aggregation of projects and existing financial incentives
Public consultation for renovation strategies	<b>11</b>		SUPPORT	We suggest to support a transparent involvement of stakeholders
Reporting	<b>12</b>		SUPPORT	We suggest to support a coherent alignment with the Governance Regulation
Building requirements for new and existing buildings	<b>13, 14</b>		SUPPORT	We support these CAs, but we would stress that "high-efficiency <i>alternative</i> systems" should not suggest that efficient supply is an alternative or a replacement to new efficient buildings or energy renovations. We support the positive synergies between energy renovation and high-efficiency systems in all situations
TBS (art 8, para 5)	<b>21</b>		SUPPORT	We suggest to support the documentation of modified energy performance and indoor air quality when TBS are installed, replaced or upgraded
		<b>422, 423</b>	SUPPORT	We also suggest to support these AMs from ENVI opinion to provide appropriate temperature control functionalities in individual rooms
Heating systems (art 14)	<b>24</b>		SUPPORT	We suggest to support the progress done on this article compared to the Commission's proposal: a mandatory requirement for the equipment of BACS in non-residential buildings by 2023 (paragraph 2) is added
		<b>69</b>	OPPOSE	We suggest to oppose this AM from ENVI opinion on the concept of "adequate advice" as introduced by the Energy Council

Air-conditioning systems (art 15)	<b>25</b>		SUPPORT	We suggest to support the progress done on this article compared to the Commission's proposal: a mandatory requirement for the equipment of BACS in non-residential buildings by 2023 (paragraph 2) is added
		<b>74</b>	OPPOSE	We suggest to oppose this AM from ENVI opinion on the concept of "adequate advice" as introduced by the Energy Council
Smartness Indicator (SI)	<b>26, 28</b>		SUPPORT	We suggest to support the appointment of the Commission to adopt delegated acts to define a SI on the basis of a design/methodology set in Annex Ia, after consultation with stakeholders. The complementarity between SI and the Energy Performance Certificates should be clarified in order to ensure comprehensiveness and consistency in the way the energy performance of the building is expressed, and to maximize its overall performance
Review clause	<b>29, 29b</b>		SUPPORT	We suggest to support a review anticipated at 2024, including also art. 11 for an evolution of EPC towards Building Renovation Passports