

Joint Statement on the ongoing Energy Performance of Buildings Directive (EPBD) review

We welcome the ongoing review of the Energy Performance of Buildings Directive (EPBD)¹, which aims at addressing the buildings' footprint in the external environment, but which also has an influence on the quality of indoor air and its impact on health and the quality life of inhabitants.

Considering the current discussions on the review of the EPBD at the European Parliament level,² the signatories of this statement would like to emphasize the importance of creating a legislative framework that provides for concrete definitions, not only to fulfil the goals of the 'Fit for 55' climate neutrality goals, but also addressing health targets through the robust and unequivocal integration of the role of buildings as enablers for better health outcomes.

Poor indoor air quality is responsible for 10% of non-communicable diseases globally.³ For patients living with allergy, asthma and chronic obstructive pulmonary diseases (COPD), clean buildings mean, first and foremost, healthy indoor air. Pollutants of indoor air such as mould, dampness, heating/cooking emissions and tobacco smoke can be found everywhere. At this precise moment when the COVID-19 pandemic has brought the issues of ventilation and air quality to the spotlight, only a more ambitious EPBD, based on measures enshrined into legislation, would ensure the proper implementation of the Renovation Wave vision, and the specific targets that will arise from the revised EPBD. We therefore highlight the following points to be included in the EPBD recast:

1. Need for a clear definition of 'ventilation' that relates to indoor air quality

The EC proposal to review the EPBD covers several technologies which aim at controlling the indoor environment, such as heating systems, air conditioning systems, and ventilation. While the former systems have been included in Article 2 – 'Definitions' of the proposal which lists several explanations (57) of the notions referenced across the proposal, the proposal does not provide a definition for 'ventilation', leaving the concept open to interpretation and legal uncertainty is ensured.

¹ COM(2021) 802 Proposal for a Directive of the European Parliament and of the Council on the energy performance of buildings (recast), available at [COM_COM\(2021\)0802_EN.pdf \(europa.eu\)](https://eur-lex.europa.eu/eli/com/dir/2021/802/1/en).

² COD(2021)0426 Draft Report on the proposal for a directive of the European Parliament and of the Council on the energy performance of buildings (recast), available at [PR_COD_1amCom \(europa.eu\)](https://eur-lex.europa.eu/eli/pr/cod/2021/0426/1/en).

³ World Health Organisation Regional Office for Europe, Noncommunicable Diseases and Air Pollution, 2019 http://www.euro.who.int/_data/assets/pdf_file/0005/397787/Air-Pollution-and-NCDs.pdf?ua=1

Thus, the signatories of this statement propose that, within the meaning of the EPBD proposal, ventilation is defined according to the WHO definition of *'process of bringing clean or filtered outdoor air inside and letting indoor air outside in order to maintain or improve air quality'*.

2. Requirements for the monitoring and control of indoor air quality

The signatories welcome the EPBD proposal and strongly support an ambitious Directive to reach the objectives of the Renovation Wave strategy. We particularly support the requirement (Article 5 EPBD) to safeguard healthy indoor climate and consider indoor air quality aspects when setting minimum energy performance requirements and calculating building performance to make sure that deep energy renovations are improving, and not deteriorating, indoor climate quality.

Therefore, we strongly support the requirements of Article 11 for the monitoring and control of indoor air quality. Moreover, we strongly appreciate that the proposal specifies ventilation as the solution to ensure adequate indoor air quality and requires for inspection regimes to be developed for standalone and combined ventilation systems, beside heating and air conditioning.

3. Future Energy Performance Certificates (EPC) that inform about indoor air quality

Inhabitants access to information on the indoor air quality is capital and therefore we encourage that the annex of the Energy Performance Certificates (EPC) includes information related to ventilation rate, air quality monitoring and control, winter and summer thermal comfort. We propose adding three new mandatory elements:

- information regarding ventilation rates in the most common space categories;
- winter and summer thermal comfort;
- displaying the IEQ categories I-IV as defined by EN16798-1, as well as moving the two requirements on IAQ monitoring and control from the voluntary to the mandatory elements.

4. Ensure a fair energy transition by embedding health effects of buildings

Lastly, we propose to complete the fair transition approach by introducing and addressing health vulnerability and drive equity in the text of the EPBD. Therefore, we strongly support the specific mentioning of the health dimension of EPBD, by substituting the vague concept of 'health externalities' by the scientific discipline of measuring 'health effects' (Recital 17 and Article 2), and naming some of these effects, for example allergy, asthma, and chronic respiratory diseases (Recitals 33 and 35). Moreover, we proposed the addition to refer to health vulnerability in Recital 48 and Article 2.



About EFA: *The European Federation of Allergy and Airways Diseases Patients' Associations (EFA) is the voice of over 200 million people living with allergy, asthma, and chronic obstructive pulmonary disease (COPD) in Europe. We bring together 45 national associations from 26 countries and channel their knowledge and patients' needs to the European institutions. We connect European stakeholders to ignite change and bridge the policy gaps on allergy and airways diseases so that patients live uncompromised lives, have the right and access to the best quality care, and a safe environment.*

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About REHVA: *The Federation of European HVAC Associations, founded 1963, joins European societies in the field of building engineering services representing more than 100.000 HVAC engineers and building professionals in Europe. REHVA is the leading independent professional HVAC organization in Europe, dedicated to the improvement of health, comfort and energy efficiency in all buildings and communities.*

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