

The 3rd Revision of the Energy Performance of Buildings Directive (EPBD)



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With the adoption of the Renovation Wave strategy on 14 October 2020 [1], the European Commission set the ambition to at least double the annual renovation rates of Europe's building stock in the next ten years, with a special focus on increasing deep renovations. One of the key legal acts to achieve this is the Energy Performance of Buildings Directive (EPBD) which opened up for a third revision in early 2021. This article provides an update on the process and an overview of the stakeholder workshops organised by a consortium to support the Commission with collecting feedback and impact assessment, as well as the position that REHVA is advocating in this process.

The need for a new EPBD revision under the Renovation Wave

The previous revision of the EPBD [2] demanded Member States, by 10 March 2020, to develop national renovation strategies to achieve a decarbonised building stock by 2050 and stricter requirements for the inspection of heating, ventilation and air conditioning systems, among other provisions. The next review was originally planned for 2026 but the Commission assessed that the EPBD would need to be

strengthened again in order to meet the objective of at least doubling the annual renovation rate of buildings by 2030.

Three focus areas have been identified for the policy and financing efforts under the Renovation Wave:

- a) Tackling *energy poverty and worst-performing buildings*, ensuring access to healthy housing for all households.
- b) There is a strong need for *renovation of public buildings*, e.g. healthcare, educational and administrative facilities, so that public buildings can lead by example.
- c) *Decarbonisation in heating and cooling* which are currently responsible for 80% of energy consumed in residential buildings.

The ongoing revision of the EPBD will likely impact all three but corresponds mostly to the first area on improving the worst-performing buildings. The actions of the Commission in the Renovation Wave focus on strengthening information, legal certainty and incentives for public owners and private tenants to encourage more renovations. To accomplish this the Commission is currently considering different measures, such as a phased introduction of minimum energy performance standards (MEPS) [3], an improvement of Energy Performance Certificates (EPC), and possible introductions of a 'deep renovation standards', Digital Building Logbooks and Building Renovation Passports.

Process of the third EPBD Revision

The Commission is currently preparing to adopt a new proposal on the third revision of the EPBD, foreseen for the end of 2021 (Fit for 55 legislative package [4]). Complementary to this, the Commission is in the process of gathering inputs from stakeholders in order to present a robust EPBD proposal. This process for feedback opened on 22 February 2021 when the Commission published a roadmap [5] to assess the best approach for the EPBD to fulfil the Renovation Wave objectives. Stakeholders were invited to share their feedback on the roadmap up until 22 March - to which ultimately 243 contributors responded, REHVA being one of them (see further for REHVA's response).

The second phase of the feedback process ran as a public consultation from March 30th until June 22nd. A consortium of consultants has been contracted by the Commission to provide support with the stakeholder consultation process and impact assessment. This phase consisted of a public consultation questionnaire and a series of stakeholder workshops with 170 to 250 participants per workshop. DG Energy provided introduction and closing remarks for each workshop. It was interesting to note that representatives from multiple Member States were spotted in the

participants list, who were following the discussions in listening mode.

Below a brief summary is provided on the topics of the first four workshops and the results to the most relevant poll questions. The fifth and final workshop – on accessible and affordable financing – from June 3rd has not been included in this overview as it was yet to take place at the time of writing.

Workshop 1: Setting a vision for buildings and a decarbonised building stock

The first workshop took place on 31 March 2021 and aimed to assess the overall priorities related to the EPBD among stakeholders from across the field. The first poll question asked if the introduction of a new EU-harmonized GHG metric for measuring building performance should be prioritised. With 74% a large majority of the respondents answered “yes” to the question.

The second poll question asked stakeholders which instruments within the EPBD are a priority for revision. As seen in **Figure 1**, the priorities according to stakeholders were the MEPS, EPC and Long-Term Renovation Strategies (LTRS) from Member States.

Question 2. In the frame of the EPBD revision, which instrument would you consider as the priority because its revision or addition could make a difference towards the 55% target, you? (n=133)

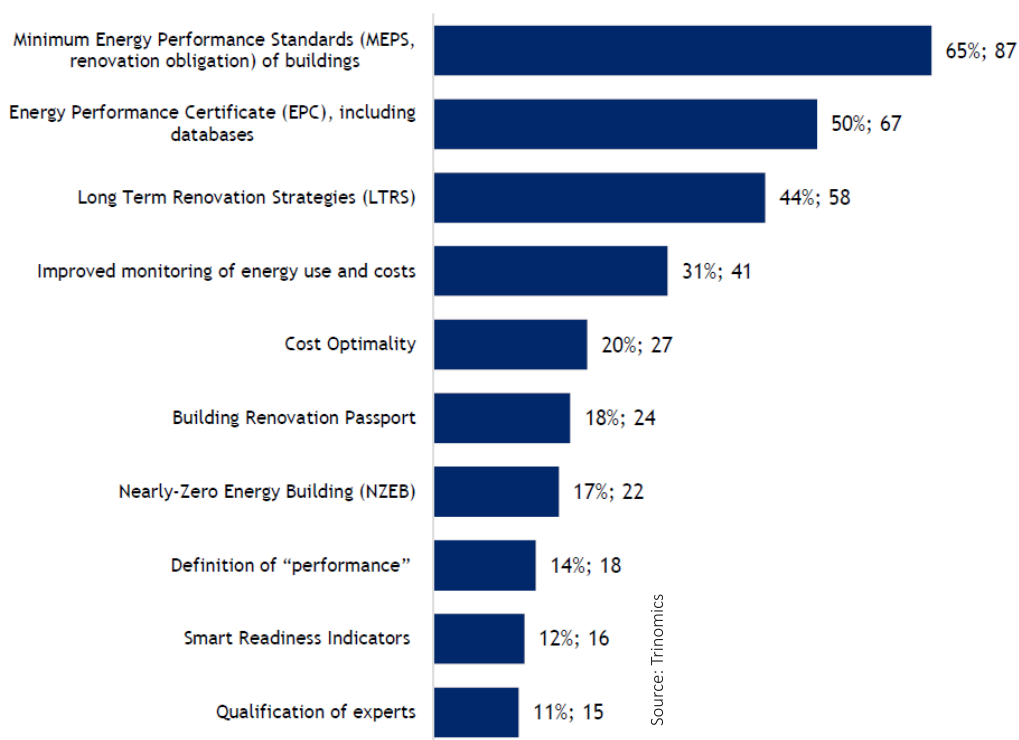


Figure 1. Poll results on the priority of instruments to be revised within the EPBD according to participants in Ws 1.

Workshop 2: Minimum Energy Performance Standards [6] (MEPS) for existing buildings

The second workshop, focused on amending the MEPS within the EPBD as a way to tackle the worst-performing buildings in Europe. The first poll question during this workshop asked about the key elements to guarantee a successful implementation of MEPS by Member States. As can be seen in **Figure 2**, many respondents thought a phased introduction of MEPS was crucial as well as links to LTRS, EPC and Building Renovation Passports (BRP).

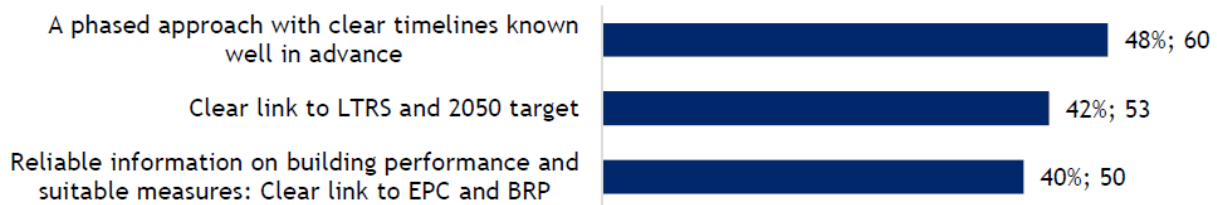
The last poll question in this workshop asked which should be the main criteria to identify buildings for which mandatory MEPS should be applied. A strong majority (68%) of the respondents answered that this should be based on “performance level”, making clear that MEPS are an instrument to tackle the worst-performing buildings.

Workshop 3: Strengthening building information tools (with focus on EPC)

On 29 April the third workshop took place which had the information role, quality and scope of EPCs as the main topic of discussion. When respondents were asked about the most important aspect to improve in EPCs, the most popular answer - by a large margin - was to improve the “quality and reliability of EPC”. The concerns of reliability were confirmed in the poll results of a later question when participants were asked what was needed to improve the quality of EPC. **Figure 3** shows that the most popular answer to this question was that the energy performance gap (calculated vs. metered data) needed to be addressed to increase the data reliability of EPCs.

Another poll question made it clear that almost half of the respondents thought that a “comparison with current building regulations or future objectives” would strongly strengthen the information role of EPCs.

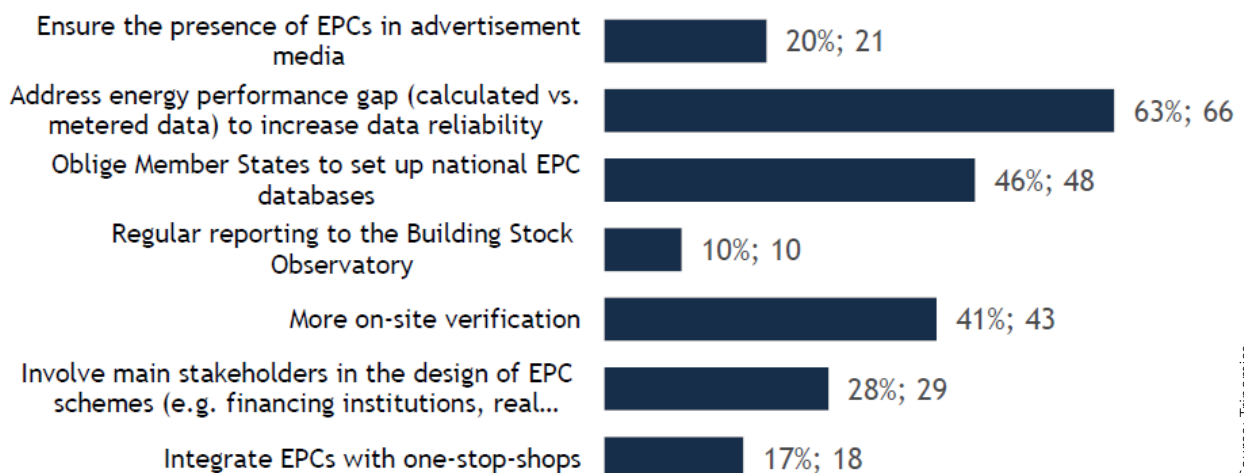
Question 1. What are the key elements to guarantee a successful implementation by MS? (n=126)



Source: Trinomics

Figure 2. Three most popular poll results on the key elements of a successful implementation of MEPS according to participants in Ws 2.

Q4. What is needed to improve the quality of EPC? (n=105)



Source: Trinomics

Figure 3. Poll results on what is needed to improve the quality of EPCs according to participants in Ws 3.

Workshop 4: Fostering the green and digital transitions

The 4th workshop had a larger variety of items to discuss – among them smart buildings and BRPs. As can be seen in

Figure 4, participants were asked what the most important indicators are that smart building systems could provide. Improved thermal comfort and IAQ were among the most popular answers according to respondents.

S1 - Q1. What are the most important indicators smart building systems can provide and should be addressed in the EPBD? (n=86)

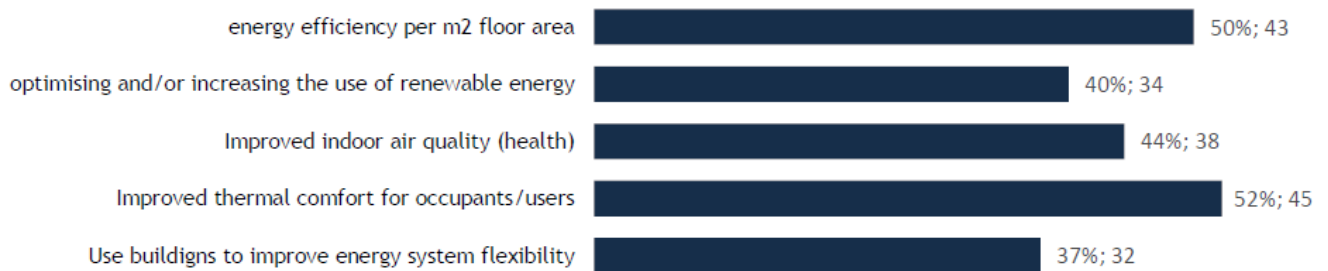


Figure 4. Poll results on the most important indicators smart building systems can provide according to participants in Ws 4.

Source: Trinomics



Photo: Alexander Steamaze / Shutterstock

REHVA Position and Contribution to Revision Process

At the time of writing, REHVA is preparing a response to the public consultation questionnaire together with its Member Associations. Earlier this year REHVA published a position paper [7] in response to the roadmap. REHVA supports the policy option for a revision of the EPBD to foster deep renovation that delivers healthy and energy efficient buildings while boosting digitalisation in the construction and building renovation sectors. Consistent with the previous EPBD revision REHVA continues to advocate for more attention to be paid to improved indoor air and environmental quality (IAQ & IEQ) resulting from deep renovations. IEQ and ventilation requirements should be integrated into renovation policies within the scope of the EPBD. Furthermore, EPCs should contain an IEQ indicator according to the EN/ISO EN 16798-1 standard [8]. The ALDREN-Tail indicator [9] can be used as good practice to rate the IEQ of buildings undergoing deep renovation. The EPBD review should also keep the ‘energy efficiency first’ principle for deep renovation with primary energy as its key metric.

In parallel, REHVA has been active in the above-mentioned stakeholder workshops stressing also the importance of a both qualitative and quantitative Smart Readiness Indicator (SRI) as a market-pull instrument to support the digital transformation of buildings. Furthermore, REHVA leveraged its involvement in 2 of the 7 active projects of the Horizon 2020 ‘Next Generation EPC Cluster’ [10], providing overall support in the evolution of energy performance assessment and certification across the EU and paving the pathway to measured and operational building performance.

Next steps

With the end of the public consultation round on 22 June, we now have to wait for the Commission to publish the proposal for the third EPBD revision which is foreseen at the end of 2021. After that the European Parliament and the Council of the European Union will discuss and amend the proposal (so-called “trialogues”), until an inter-institutional agreement can be found for the final text. The length of this process depends on the negotiations, during the previous revision (between 2016 and 2018) the inter-institutional negotiations lasted 18 months. ■

Endnotes:

- [1] https://ec.europa.eu/energy/sites/ener/files/eu_renovation_wave_strategy.pdf
- [2] Directive (EU) 2018/844 of the European Parliament and of the Council of 30 May 2018 amending Directive 2010/31/EU on the energy performance of buildings and Directive 2012/27/EU on energy efficiency https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2018.156.01.0075.01.ENG
- [3] These “standards” should be interpreted as a set of minimum requirements to which existing buildings would have to adhere to
- [4] https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1940
- [5] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12910-Energy-efficiency-Revision-of-the-Energy-Performance-of-Buildings-Directive_en
- [6] These “standards” should be interpreted as a set of minimum requirements to which existing buildings would have to adhere to
- [7] https://www.rehva.eu/fileadmin/user_upload/REHVA_feedback_EPBD_review_long.pdf
- [8] <https://epb.center/documents/en-16798-1/>
- [9] <https://www.rehva.eu/rehva-journal/chapter/application-of-aldren-tail-index-for-rating-the-indoor-environmental-quality-of-buildings-undergoing-deep-energy-renovation>
- [10] <https://youtu.be/ILibLOEXDdo> (Next Generation EPCertificates H2020 cluster ~5 min pitches)