

## **Housing Europe amendment proposals on the package “Clean Energy for All Europeans”**

Energy Performance of Buildings Directive (EPBD) (part I)

Energy Efficiency Directive (EED) (Part II)

Renewable Energies Directive (Part III)

### **Introduction**

Housing Europe believes that the Clean Energy For All Europeans package can support a fair energy transition if it helps to:

- Adopt evidence-based national strategies for the renovation of the building stock bringing together supply and demand for renovation, regulation and finance, with the view to achieve affordability for both tenants and owners (EPBD)
- Look beyond the buildings and consider the neighbourhood as the right level to design sustainability measures such as electro mobility (EPBD) and energy self-consumption (RED)
- Consider the cost effectiveness of measures related to new requirements (for instance on metering) as a crucial criteria because it will guarantee timely and effective implementation as well as increase the social acceptance (EED)
- Promote the use of renewable energy in particular via decentralized energy production systems (RED)
- Support this integrated approach by developing the relevant skills in the field of demand (building owners) and supply (renovation companies) of renovation as well as finance (loans and subsidies) and regulation (related to split incentives)

### **Part I : How to improve and more effectively achieve the objectives of the Directive on the Energy Performance of Buildings (EPBD)**

#### **Summary of Housing Europe proposals**

- The long term renovation strategies (article 2) should ensure affordability for tenants and landlords by promoting cost effective measures

- The requirements on the promotion of electro mobility should be limited to newly built residential units, since electro mobility has to be promoted at the district level rather than building level
- The use of smartness indicator should only make sense for newly built residential units if cost effectiveness is ensured and concrete implementation should be left to member states
- The use of financial schemes as an incentive for energy efficiency improvements is a common practice in many member states (where subsidies are often granted according to the level of performance) but a strict obligation could be detrimental as it might create more risks for the building owner. A way to mitigate the risk for the owner is to promote guarantee of energy performance.

## Concrete amendment proposals

Underlining = new text compared to Directive 2010/31/EU of the European Parliament and the Council of 19 May 2010 on the energy performance of buildings.

### Revised Article 2

2. (b) the following paragraphs 2 and 3 are inserted:

In their long-term renovation strategy referred to in paragraph 1, Member States shall set out a roadmap with clear milestones and measures with the objective to decarbonise their national building stock by 2050 while achieving affordability for the tenants and owners of the buildings.

### Revised Article 8

5. (b) 3. Member States shall ensure that newly built residential buildings **[deleted: and those undergoing major renovations]** with more than ten parking spaces, can be equipped to enable the installation of recharging points for electric vehicles **[deleted: for every parking place]**

6. The Commission is empowered to adopt delegated acts in accordance with Article 23 supplementing this Directive with a proposal for the use of a 'smartness indicator' for newly built buildings if this use is cost-effective and with the conditions under which the 'smartness indicator' would be provided as additional information to prospective new tenants or buyers and landlords. The smartness indicator shall cover functionalities that will help the owner and/or the tenants to take part in demand response and contribute to the optimum, smooth and safe operation of the various energy systems and district infrastructures to which the building is connected. Taking into account the cost effectiveness criteria, Member States shall decide about the concrete implementation of the smartness indicator;

### Revised Article 10:

(a) paragraph 6 is replaced by the following:



6. Member States shall set up financial schemes that will incentivize energy efficiency improvements for instance by adapting the financial support for the building renovation to the achieved energy performance.

## **Part II : How to improve the Energy Efficiency Directive (EED)**

### **Summary of Housing Europe proposals**

- Article 9a paragraph 2 and 4 must be revised to retain the flexibility in the national implementation and to ensure that the measures implemented are cost-efficient and technically relevant.

### **Concrete amendment proposals**

Underlining = new text compared to Directive 2012/27/EU of the European Parliament and the Council of 25 October 2012 on energy efficiency.

#### **Revised Article 9**

2. In multi-apartment and multi-purpose buildings with a central heating or cooling source or supplied from district heating and cooling systems, individual meters shall be installed to measure the consumption of heat or cooling or hot water for each building unit **if technically feasible and cost-efficient.**

**In new buildings of the kind referred to in the first sub-paragraph or when such a building undergoes major renovation, as set out in Directive 2010/31/EU, individual meters or individual heat costs allocators shall be provided if technically feasible and cost-efficient.**

Where the use of individual meters is not technically feasible or where it is not cost efficient to measure heating or cooling in each building unit, individual heat cost allocators shall be used to measure heat consumption at each radiator unless it is shown by the Member State in question that the installation of such heat cost allocators would not be cost efficient. In those cases, alternative cost-efficient methods of heat consumption measurement may be considered. The conditions of technical non feasibility and non-cost effectiveness shall be clearly set out and published by each Member State.

**[Deleted: In new buildings of the kind referred to in the first sub-paragraph or when such a building undergoes major renovation, as set out in Directive 2010/31/EU, individual meters shall always be provided].**

#### **Revised Article 9a**

4. For the purpose of this Article, as of 1 January **2021** meters and cost allocators installed shall be remotely readable devices, **except if it is technical not useful, for example in cases of single pipe heating systems.**

## **Part III: How to improve the Directive on the promotion of the use of energy from renewable sources (RED)**

### **Summary of Housing Europe proposals**

- Article 15 should be flexible in respect of the requirement for use of renewable energy in the case of new construction work and buildings undergoing major renovations so that this requirement can be met by district heating.
- Article 21 should recognise the role of landlords in the setting up of self-consumption schemes

### **Detailed Amendment proposals**

Underlining = new text compared with Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources.

#### **Revised Article 15**

5. Member States shall, in their building regulations and codes or by other means with equivalent effect, where appropriate and cost effective, require the use of minimum levels of energy from renewable sources in new buildings and in existing buildings that are subject to major renovation, reflecting the results of the cost-optimal calculation carried out pursuant to Article 5(2) of Directive 2010/31/EU. Member States shall permit those minimum levels to be fulfilled, inter alia, through district heating and cooling produced using a significant proportion of renewable energy sources.

#### **Revised Article 21**

Renewable self-consumers

3. The renewable self-consumer's installation may be built or managed by a third party, especially in rented buildings by the landlord or a mandated party, for installation, operation, including metering, and maintenance.

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