

RTG position on the draft of the Energy Performance of Buildings Directive (EPBD)

March 31st, 2022

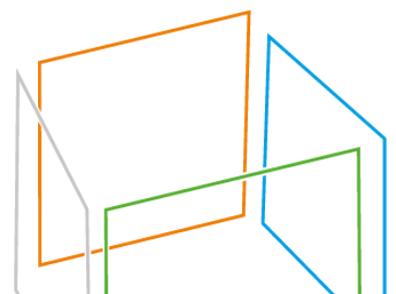
1. Overall position and recommendations

The Representative Office of the Transparent Building Envelope is the political representative of the glass, windows, façades, sun protection and building automation sectors in Germany. We welcome the draft of the revised EPBD as well as the goal expressed therein of significantly intensifying and accelerating the energy modernisation of the building stock. In particular, we consider the plan to introduce binding minimum energy performance standards for the existing building stock and the associated strategy to prioritise the renovation of the worst buildings ("worst first") to be correct. Minimum energy performance standards, which address all buildings on a binding basis in terms of time and efficiency classes, are the long-needed game changer for climate protection in the building stock. They probably represent - in combination with other instruments - a key element without which the ambitious energy and climate targets in the building sector are unlikely to be achievable. At the same time, the legally compliant and socially and politically acceptable introduction of MEPS will pose challenges and take time.

Against this background, we are somewhat concerned that the EU is simultaneously aiming for harmonised building energy performance certificates including energy performance classes and databases, new building renovation passports, a new smart readiness indicator, a new sustainability rating as well as a new building standard and new requirement values with the EPBD. This could result in considerable and lengthy political, bureaucratic and legal work before the instruments can have an effect. Even if these innovations are largely correct in themselves. The member states should therefore be given the greatest possible freedom in the national implementation of all instruments, without, however, being able to weaken the effectiveness of the instruments. In our view, the fastest possible, legally secure start of the minimum energy performance standards should have priority.

In addition, we recommend to introduce a binding requirement for the energy efficiency of the building envelope that adequately takes into account both heat losses and energy gains from solar radiation through transparent building components.

In the following, we focus on key recommendations for improving the present EPBD amendment.





2. Position and recommendations in detail

Article 2: Definitions

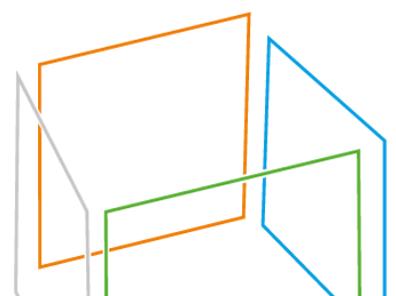
- The inclusion of a definition of "healthy indoor climate" is explicitly welcomed. This should also include an indicator for daylight, which plays an important role for healthy living. Ideally, a set of indicators analogous to DIN EN 16798-1 should be included.
- In view of the advancing climate change, efficient heat protection of buildings is playing an increasingly important role. Structural summer heat protection, which consumes only minimal energy during operation, should always have priority over active cooling. Smart solar shading should therefore be included in the definition of the "technical building system" and the "building automation and control system".

Article 3: National Building Renovation Plans

- We welcome national building renovation plans as an important instrument of climate change governance for the building sector. However, as the risk of missing targets is high in many countries, especially in the short term up to 2030, the revision cycle should be shortened from five to a maximum of three years.

Article 4: Adoption of a methodology for calculating the energy performance of buildings (together with Annex 1)

- Energy gains from solar radiation play an important role in efficient buildings and can provide a significant part of the required thermal energy. This effect must be taken into account when planning the building envelope (new construction and renovation). Therefore, the EU should oblige all Member States to define and set a binding requirement value for the energy performance of the building envelope that adequately takes into account both heat losses and energy gains from solar radiation (energy balance principle). If this is not done, there is a risk of planning errors that can lead to building envelopes that are suboptimal in terms of energy and economy. Taking solar energy gains into account in the overall primary energy assessment of buildings is not sufficient, as this does not create any binding relevance for the planning of the building envelope.





Article 7: New Buildings

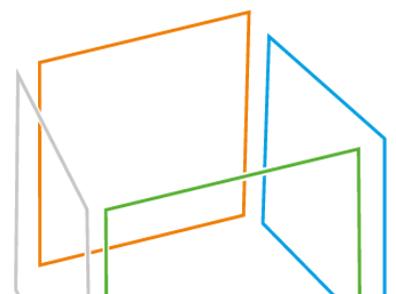
- The RTG welcomes the fact that new buildings will have to meet the new "zero emission building" standard from 2030.
- Especially in this highly efficient building segment, however, energy gains from solar radiation play a central role in the energy balance and must be included in the energy assessment of the building envelope. Therefore, the EU should oblige all Member States to define and set a binding requirement value for the energy performance of the building envelope that adequately takes into account both heat losses and energy gains from solar radiation (energy balance principle).

Article 8: Existing Buildings

- Just as with new buildings, existing buildings are about to become so efficient through ambitious renovations that a climate-neutral building sector is created. Against this background, a binding requirement value for the energy efficiency of the building envelope that adequately takes into account both heat losses and solar energy gains also plays an important role for existing buildings and should definitely be included (see above).

Article 9: Minimum Energy Performance Standards

- We explicitly support minimum energy performance standards in the form presented here. They address the worst building classes in each case in a binding way and over a longer period of time. The only weakness of the current approach is that it leaves owners with the option of only ever carrying out as much refurbishment as is needed for the next energy class. This not only misses the climate targets, but may also trigger multiple refurbishments of the same building components. The goal must be to use the minimum energy performance standards to create renovation occasions that are used in as many cases as possible for comprehensive, high-quality renovation with strong CO₂-reductions. To achieve this, the worst buildings should have to directly achieve an improvement of two energy efficiency classes in the first requirement levels. Further improvements should be specifically encouraged through funding.





REPRÄSENTANZ
TRANSPARENTE
GEBÄUDEHÜLLE

About the RTG

The Representative Office of the Transparent Building Envelope is the political representative of the glass, windows, façades, sun protection and building automation sectors in Germany. It provides impetus and is a dialogue partner for all political organisations and stakeholders who shape the building and energy policy.

Contact:

Representative Office of the Transparent Building Envelope GbR

Thomas Drinkuth, Head of the Representative Office

drinkuth@transparente-gebaeudehuelle.de

+49 160 - 96228006

Unter den Linden 10

10117 Berlin (Germany)

