



COMMON INDUSTRY AND PROFESSIONAL ASSOCIATIONS COMMENTS ON THE ENERGY PERFORMANCE OF BUILDINGS DIRECTIVE REVIEW

A call to strengthen the impact of Technical Building Systems

The current review of the [Energy Performance of Buildings Directive](#) (EPBD) offers a unique opportunity to strengthen the impact of Technical Buildings Systems (TBS), as a way to drive the much needed improvements in the existing building stock and promote systems and solutions that result in low energy consumption, high Indoor Air Quality (IAQ), and consumer empowerment.

Today, despite the obvious benefits, basic building automation and control functionalities of heating, cooling, ventilation systems, lighting and blind integration as well as regular service and maintenance are often missing or being neglected, although they could trigger energy savings of over 30% at very low payback times.

Ahead of the European Parliament and Council positions on the EPBD review, our associations – active in the heating, cooling, refrigeration, air-conditioning, heat-pump, ventilation, building monitoring and engineering industries, representing millions of jobs in Europe – jointly renew their call for an ambitious EPBD and a strengthened focus on TBS.

Support mandatory inspections and additional electronic monitoring and control system requirements for large buildings (Articles 14 and 15)

- Technical building system' means technical equipment for space heating, space cooling, ventilation, domestic hot water, built-in lighting, building automation and control, solar shading, on-site electricity generation, on-site infrastructure for electro-mobility, or a combination of such systems, including those using energy from renewable sources, of a building or building unit.
- Our associations support mandatory regular inspections of technical building systems of relevant sizes and the introduction of electronic monitoring and control systems, including heating, cooling and ventilation systems. These inspections and monitoring requirements would ensure their optimal performance, improve indoor air quality, drive energy savings in the existing building stock and raise awareness among consumers for optimized behaviour. These monitoring requirements would not be imposed to the detriment of inspections.
- Our associations call for the harmonised implementation across the EU of the dedicated standards that define how inspections should be undertaken.
- Our associations caution that programmes for stand-alone "adequate advice" cannot replace inspections and will generally not lead to any improvement of the heating, ventilation and cooling systems - contrarily to what seems to be assumed by Member States.
- Member States shall set requirements to ensure that new non-residential buildings and those undergoing major renovation with total primary energy use of over 250 MWh per year are equipped with building automation and control systems, as of 1 January 2023.



Support a smartness indicator (Article 8) that tap the potential of TBS

- Our associations support the Commission's proposal for a smartness indicator, as a useful tool to assess the technological readiness of the building to control its own energy consumption, indoor air quality, and comfort levels, and to interact with the grid to balance energy demand.
- However, our associations caution that a smartness indicator needs to be harmonized across the EU and distinguished explicitly from the existing Energy Performance Certificates. It should also refer to the on-going Ecodesign Preparatory Study on Smart Appliances (Lot 33) that analyses the technical, economic, market and societal aspects that are relevant for a broad market introduction of smart appliances¹.
- Since there is little experience regarding that indicator it is vital to set a start which can grow, as technology, experience and markets develop
- In this context, our associations look forward to the development of the smartness indicator and are ready to provide input for the criteria and the methodology.

Support the application of harmonized energy performance calculation methods in all EU Member States (Annex I)

- Our associations believe that the EPB (M/480) standards on the performance calculation methodology (including TBS), recently approved by National Standard Bodies, should be used in all Member States. We therefore call on Member States for a uniform and quick implementation in the interest of a single European market and to reap the benefits of the EPBD.

Supporting organisations:

About AREA: AREA represents European refrigeration, air conditioning and heat pump contractors. Established in 1989, AREA voices the interests of 23 national associations from 20 countries representing 13,000 companies employing 110,000 people and with an annual turnover approaching € 23 billion.

About CECED: CECED represents the home appliance industry in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Hausgeräte GmbH, Candy Group, Daikin Europe, De'Longhi, Dyson, AB Electrolux, Gorenje, Groupe Atlantic, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. KG, Panasonic, Philips, Samsung, Groupe SEB, Vestel, Vorwerk and Whirlpool Europe. CECED's member Associations cover the following countries: Austria, Baltics, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, the Netherlands, Norway, Poland, Portugal, Romania, Russia, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom.

About CoGDDEM: [CoGDDEM](http://www.co-gdem.org) is a British and European trade association assisting the industry in designing acceptable (British, European and international) codes and standards and promoting the value of high-quality gas equipment and services. In particular, CoGDDEM focuses on raising

¹ <http://www.eco-smartappliances.eu/Pages/documents.aspx>



awareness of the dangers of carbon monoxide (CO), carrying out awareness and education campaigns in this field, promoting gas safety and the use of CO alarms across Europe.

About EPEE: The European Partnership for Energy and the Environment ([EPEE](#)) represents the heating, cooling, refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of 40 member companies, national and international associations. EPEE member companies realise a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, who service and maintain our equipment. EPEE members have manufacturing sites and research and development facilities across the EU, which innovate for the global market.

About EVIA: The European Ventilation Industry Association (EVIA) was established in Brussels in July 2010. EVIA's mission is to represent the views and interests of the ventilation industry and serve as a platform between all the relevant European stakeholders involved in the ventilation sector, such as decision-makers at the EU level as well as our partners in EU Member States. Our membership is composed of more than 35 member companies and 6 national associations across Europe, realising an annual turnover of over 7 billion euros and employing more than 45,000 people in Europe.

About GCP Europe: [GCP Europe](#) is the voice of the efficient building engineering services at EU level – heating & cooling, ventilation, air condition and plumbing systems in buildings including smart controls, metering and system integration. With 18 member associations in 14 countries, GCP Europe is a powerful network in this sector in Europe.

About SEDC: The SEDC is the European business association dedicated to making the demand side a smart and interactive part of the energy system. It represents businesses and organisations active along the entire value chain, including technology providers, electricity suppliers, energy service companies, power utilities, consultancies, research institutes and other stakeholders in the field.