

# ENERGY PERFORMANCE OF BUILDINGS DIRECTIVE

## Key points for consumers

### Why it matters to consumers

Poorly insulated homes are bad for the environment, when more and more consumers want to combine what is good for their wallet and for the planet. Heating and increasingly, cooling, are a huge part of consumers' household budget: on average in the EU, 64% of the energy used is to warm up our homes. Too many consumers struggle to heat their homes today: an estimated 10% of Europeans are in energy poverty. This is why the retrofitting of our building stock is a no-brainer. It will help cut emissions and reduce household expenditure on energy bills.

The revision of the Energy Performance of Buildings Directive is an opportunity to solve this and help consumers renovate their homes and start making savings on their energy bills.

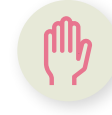
The table assesses the proposals with the following symbols:



supports the Commission's proposal



support for idea but room for improvement



an important idea is missing in the proposal

#### COMMISSION PROPOSAL

#### BEUC STANCE



**A NEW SET OF DEFINITIONS** to clarify concepts and notions about energy retrofit tools included in the Directive (*Article 2*).



Although the broadened scope of definitions is welcome, several of them should be strengthened to integrate a more consumer-centric approach. This is especially the case for "building renovation passports" and for "mortgage portfolio standards".

BEUC also suggests adding a definition of '**Energy Building Benchmarks**' so that for **multi-units, a mandatory public disclosure of information on the energy consumption and performance found** in Energy Performance Certificates is done, for **consumers to get the information on where their building stands compared to others**.



**INTRODUCTION OF NATIONAL BUILDING RENOVATION ACTION PLANS**, to push Member States to set up much more operational renovation action plans than the current Long Term Renovation Strategies (*Article 3 and Annex II*)



BEUC supports the proposal to make renovation plans more implementation-driven and to revise them every five years. These **revisions should put more focus on assessing whether the measures implemented really enable consumers engagement** (appropriate financing tools, good technical recommendations etc).

## COMMISSION PROPOSAL

## BEUC STANCE



**THE REVISION OF ENERGY PERFORMANCE CERTIFICATES (EPCs)** does not provide sufficiently clear recommendations for consumers (*Articles 16 and 17, Annexes I and V*)



EPCs will be the reference document for consumers undertaking (or wishing to undertake) a retrofit project. We therefore suggest going much further than the Commission's proposal in defining the role of EPCs. **Within the A to G EPC scale, we recommend introducing a harmonised definition of the D category which would require buildings to be energy efficient enough to ensure thermal comfort while allowing for flexible electric heating.** EPCs should also provide an estimation of when the **heating system** of a given building will reach the **end of its lifespan** as it is a useful indication to define/anticipate a renovation project.



**MINIMUM ENERGY PERFORMANCE STANDARDS (MEPS)** provide a robust and predictable framework for housing energy improvements (*Article 9*)



BEUC **strongly supports the introduction of MEPS**, which should accelerate the pace and relevance of building retrofits.



**BUILDING RENOVATION PASSPORTS (BRP)** compile all the technical, financial and administrative information in one go to provide a clear renovation roadmap to transform the property into a zero-emission building by 2050 (*Article 10*)



BEUC welcomes the core of the proposal, including the specific approach for multi-unit buildings. However, consumers need first to be given **relevant information via Energy Building Benchmarks (see above)**. An intermediary marker, between the currently suggested E - 2033 deadline and A - 2050, is necessary for people to draw retrofit plans. Hence, a **D rating by 1 January 2040** should become mandatory (see below).

BEUC suggests ensuring the tool is **both in digital and paper format**. Consistency with Energy Performance Certificates is needed **to avoid redundancy and unnecessary additional costs**. Some information should be **given twice, both in BRP and in EPC**, i.e., a range of costs for the retrofit works.



**THE ROLL OUT OF INFRASTRUCTURE FOR SUSTAINABLE MOBILITY** is accelerated in new and renovated buildings (*Article 12*)



**The removal of barriers to the installation of recharging points** in residential buildings is a first step towards an EU wide **"right to plug" for consumers**. BEUC welcomes the stronger ambition for the rollout of smart charging points, notably within office buildings. However, the requirement for the installation of smart recharging points in existing non-residential building should be more ambitious.



**FINANCIAL INCENTIVES AND MARKET BARRIERS ARE COMPREHENSIVELY ADDRESSED**, to facilitate the funding of retrofit projects (*Article 15*)



BEUC supports the Commission's proposal, as it is comprehensive. It is however **crucial that up-front costs are clearly addressed**. Mortgage Portfolio Standards (MPS) should be designed **to support owners of properties rated E, F and G to undertake energy retrofit projects**.

We suggest adding a reference to the **accountability** of building managers, who are key players in multi-unit dwellings, to clarify when they need to take responsibility in the energy retrofit projects.