



Union Française de l'Électricité

22 March 2021

## UFE's reply to the Roadmap on the revision of the Energy Performance of Buildings Directive (2010/31/EU, EPBD)

**UFE fully supports the EC's willingness to revise the Energy Performance of Buildings Directive (2010/31/EU, EPBD) as part of the Fit for 55 Package** endorsing the new EU climate ambitions. Following the Renovation Wave Strategy, the EPBD is a key file when it comes to the EU building stock's decarbonisation and renovation.

To that end, the **option 3 of the roadmap is fully appropriate** to align the directive with the objectives of the Climate Target Plan 2030. UFE supports this scenario, which can be combined with option 2, and would like to highlight some concrete recommendations.

### **1. The EPBD should develop an approach in terms of climate performance**

To achieve the 55% target of GHG emission reduction by 2030, Energy Performance Certificates (EPCs) should help reduce energy-related GHG emissions from buildings by 60% compared to 2015 level. Therefore, **the EPBD's article related to EPCs should be revised**. Their revision needs to **introduce the possibility to refer to final energy consumption alongside primary energy** to be consistent with the Energy Efficiency Directive and **introduce a carbon component in art. 11 of the EPBD**. It would thus ensure that an approach in terms of climate performance is taken into account alongside efforts in energy savings. This carbon component should be integrated to the mandatory minimum energy performance standards proposed by the EC. It should also be at the core of the Building Renovation Passports which must focus on decarbonising buildings to set the right signals on the renovations to be carried out. To that end, switching from old fuels heating systems to low-carbon energies incl. electricity will be essential in addition to energy efficiency measures.



Union Française de l'Électricité

## 2. Climate resilience and digitalisation cannot be viewed as side issues for building renovations

The EC needs to ensure that the new and renovated buildings are climate resilient. UFE supports **introducing the notion of winter and summer comfort in the EPCs in art. 11(2) and adding recommendations on thermal comfort** to avoid long periods of extreme-low or high temperature in buildings. UFE also believes **the objective of “near-zero energy building” shall be converted to a “near-zero energy and emission building”** and integrated into all new building requirements.

The EPBD should be revised in line with the new EU digital ambitions and **promote the standardisation of demand-side management and related information exchanges**. **Smart meters** provide opportunities for the buildings' energy performance by helping decision-makers to assess the needed renovations and their effectiveness as well as by providing solutions to increase the information available to building occupants on their energy consumption.

## 3. The EPBD must address the remaining barriers to private charging

Acknowledging that 90% of electric vehicle (EV) charging happens at home or in the workplace and that 80% of the EU existing building stock will be still in use in 2050, **the EPBD revision must address the outstanding barriers to the installation of charging points (CPs) in all (non-) residential buildings**. The installation of CPs should be an opportunity to audit the quality of electrical circuits of dwellings. **UFE asks the EC to reopen art. 8 to ensure the right-to-plug to all EV users** by enhancing the possibility for the tenant and co-owner to install CPs in their housings and addressing the unnecessary exemptions applied to SMEs.

**The right incentives for investments should be developed and collective charging infrastructures should be installed**, particularly in residential buildings. **Strong requirements to ensure all buildings are pre-equipped should be set and the right-to-plug must be extended to all buildings and not only new buildings or buildings subject to major renovation**. Since different connection schemes exist, involving the DSOs to advise the building decision-maker(s) can facilitate the implementation of these requirements. Additionally, **the EPBD needs to support the implementation of smart charging to foster the efficient decarbonisation of both the transport and energy sectors**. The EV has become a useful source of system flexibility for both i) the electric system and the integration of renewables and ii) the energy performance at building



Union Française de l'Électricité

scale especially as EVs park for a long period of time. It will also help reduce the connection cost as well as the bills of EV users.

The EPBD revision should be **consistent with the Alternative Fuels Infrastructure Directive** to avoid any gaps or overlaps between the two texts.