



AIE, AREA and GCP Europe Joint Position Paper on the review of the Energy Performance of Buildings Directive

AIE, AREA and GCP Europe, the 3 main European associations representing the interest of the installers welcome the revised energy performance of buildings directive (EPBD). We would like to comment on specific elements of the proposal which are of the utmost importance for our sectors: the necessity of mandatory inspections, the importance of Indoor Environment Quality and the need for an adequate e-mobility infrastructure.

1. Making inspections mandatory with adequate associated thresholds

We welcome the fact that, contrary to what had been suggested before the proposal was tabled, the proposal maintains the provisions on periodic inspections of heating and cooling systems. Such inspections are indeed necessary to ensure the efficient functioning of the system.

However, there is no mutual exclusivity between periodic inspections and the presence of building automation and control systems. We agree that these systems offer new services for the buildings and bring important energy savings and therefore impact on the frequency and content of the inspections as acknowledged by the current EPBD. Nevertheless, they do not make these inspections redundant. In particular, they are essential for the personalised advice that only installers can give to real estate investors and end-users on energy efficiency and performance of buildings. Inspections and subsequent installer's advice are indeed the primary awareness-raisers for better technical building systems, system integration and innovative smart controls. Building automation and control systems including remote maintenance are significant for the user to connect the building and its performance to network appliances as e.g. smart grid or Internet of Things (IoT). Nevertheless, the building owner or user should keep the possibility to choose between the services in order to make cost efficient decisions. We therefore suggest keeping the current framework on building automation and control systems and periodic inspections which should be complementary.

The current framework on building automation and control systems and periodic inspections should be kept, rather than making it possible to replace the latter by the former.

In addition, AIE, AREA and GCP Europe are concerned by the enormous increase of the thresholds under which no periodic inspection is necessary.

For heating systems in residential buildings, the proposed 100kW threshold covers buildings over 1,600m² in size; in non-residential buildings the reference of 250MWh means a size of over 2,500m² which in both cases would mean only very large structures are covered.

With regards to AC systems, the 100kW threshold in residential buildings is out of range, as hardly any residential buildings have AC systems of such size. The 250MWh reference covers systems in non-residential buildings starting at 10,000m³/h, which again would cover only very large constructions.

The practical exclusion of many heating and air-conditioning systems from inspections resulting from these high thresholds will necessarily impact on their energy efficiency. Moreover, companies that undertake such inspections have invested in people, training and equipment, and these investments would be lost together with the jobs they have generated.

The current thresholds should be maintained to make them purposeful in the spirit of the EPBD Directive.¹

Finally, and in order to ensure consistency across the EU, the content and frequency of the inspections should be harmonised to a certain extent. National best practice has proven that 5 years is a feasible timeframe for all stakeholders involved. This long-term timeframe should strike the balance between the practicality and proportionality of such a requirement, while avoiding an unnecessary burden on installers and associated costs being passed onto home owners or landlords. Such a frequency could be increased when a building automation and control system is installed, as indicated above.

A concrete time frame of 5 years for frequency of inspections should be implemented.

2. Ensuring better Indoor Environment Quality

There is a delicate balance between the drive towards energy savings with increasingly energy-efficient buildings and Indoor Environment Quality (IEQ). As buildings are getting tighter and better insulated in order to reduce energy losses and increase envelope performance, the air exchange by infiltration goes down to zero. Without a dedicated ventilation system, this degrades the IEQ with adverse effects on health, productivity and comfort. Therefore, IEQ should be appropriately considered in the revised EPBD.

As far as the content of the inspections is concerned, it is important to bear in mind that nowadays systems are more and more integrated. Inspections should therefore involve not just heating & cooling but also ventilation. In this context, we call for mandatory inspections

¹ DIRECTIVE 2010/31/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 May 2010 on the energy performance of buildings: Regular inspections concern the heating systems of an effective rated output for space heating purposes of more than 20 kW and air-conditioning systems of an effective rated output of more than 12 kW.

in Article 15 to include ventilation and air-conditioning systems, also due to its enormous potential for energy savings in general. Ultimately, only comprehensive mandatory inspections of energy as well as ventilation and air-conditioning systems would help achieve the full energy efficiency and emission savings potential of buildings.

Mandatory inspections should include ventilation and air quality checks in order to adequately support Indoor Environment Quality aspects.

3. Enabling a proper framework for the deployment of e-mobility infrastructure

We very much welcome a future looking view of the Commission to go beyond energy savings provisions and have a holistic view of the building, integrating the building into a wider 'eco-system' (smart grid & micro-grid) by enabling a proper framework for the deployment of e-mobility infrastructure which will be an integral part of tomorrow's society.

We strongly support the obligation to include the pre-cabling / pre-tubing with sufficient capacity to allow increasing power needs that will enable the installation of a recharge infrastructure in all new residential buildings and those undergoing major renovation in line with the deployment of the electric vehicles market in each Member State. Installing tubes / cables when constructing the building or when renovating it makes the operation much cheaper for the end-consumer while recharging points in those big residential building will always be needed. However, if the capacity is not sufficient, a second more expensive investment at the time of installing the charging points, will be needed.

The pre-cabling/pre-tubing capacity must be sufficient to allow increasing power needs that will enable the installation of a recharge infrastructure.

AIE, the European Association of electrical contracting companies, represents through its 15 national member associations about 125,500 specialist contracting companies employing about 1,200,000 workers in the EU-countries and beyond. The AIE represents companies from all sizes, the big majors and a majority of small and medium size enterprises. AIE member companies have an in-depth knowledge and high-quality expert skills to carry out all kind of electrical engineering and infrastructure works (high, medium and low voltage). The overall turnover of the AIE member association sector is approximately 137 billion Euros.

AREA is the European association of refrigeration, air conditioning and heat pump contractors. Established in 1989, AREA voices the interests of 25 national associations from 22 countries representing 13,000 companies employing 110,000 people and with an annual turnover approaching € 23 billion.

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.