

FIEC is the European Construction Industry Federation, representing via its 29 National Member Federations in 26 countries (23 EU & EFTA and Turkey) construction enterprises of all sizes, i.e. small and medium-sized enterprises as well as “global players”, carrying out all forms of building and civil engineering activities.
Recognised "Sectoral Social Partner" (employers)



EUROPEAN CONSTRUCTION
INDUSTRY FEDERATION

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Yes to revised EPBD but not all provisions are smart !

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■ Drastic improvement in energy renovation rates essential

Given that FIEC has long held the view that the main problem with the existing Energy Performance in Buildings Directive (EPBD) lies in inconsistent and half-hearted implementation, obviously the Federation welcomes any effort to improve the rate of energy renovation of the building stock in the EU. FIEC participated in the consultation that preceded the proposal for an amending Directive and agrees strongly with the findings, which resonate with its own concerns.

With this in mind, FIEC is pleased to see the provision requiring Member States to include the renovation of residential and non-residential buildings in their long-term building renovation strategies. That said, while further ambition is clearly required, any measures imposed should be technology-neutral, should not be so onerous as to be unachievable and local circumstances must always be taken into account. Climate, aspect, available building materials, local common building methods, occupier behaviour and many other factors affect energy efficiency and the kind of renovation that is likely to yield the best energy savings. Furthermore, investors and building owners want to see a tangible return on investment. This can be difficult to predict precisely before renovation takes place and difficult to demonstrate afterwards, especially in the short term. Therefore, we urge Member States to be ambitious but pragmatic, maximising financial support from the available EU funds and providing adequate information to meet the needs of those seeking to invest/renovate their buildings.

■ Comparing EPCs to justify public investment is premature

It is entirely reasonable to seek assurance that public funding has been well spent, with an eventual system for monitoring improvements in energy savings following renovation work that has been partly financed with public money. However, FIEC is strongly opposed to the mandatory use of Energy Performance Certificates (EPCs) for this purpose, unless and until the quality of these certificates, the parameters used and the training of assessors is improved and harmonised across the EU. While it would seem sensible to use an existing system rather than create something new, such evaluation cannot be introduced now. Basing funding decisions on “before” and “after” EPCs is premature in many Member States, with a high risk that neither investors nor beneficiaries will have access to a level playing field. FIEC urges the co-legislators to press for a delay in – or even deletion of - this measure.

■ Ecodesign to be aligned with existing measures for construction products?

FIEC published a position on Ecodesign and Energy Labelling in 2014 <http://www.fiec.eu/en/fiec-positions/position-papers.aspx>. Our principle objection has always been that for construction products the objectives of the Ecodesign and Energy Labelling Directives can best be achieved through the Construction Products Regulation 305/2011 (CPR). We remain opposed to any new, separate measures which duplicate the requirements of the CPR, because such duplication creates an administrative burden and increases costs for both producers and users of construction products. That said, even though construction products are clearly listed in the Ecodesign Working Plan 2016-2019, it is not clear whether the intention is to introduce additional requirements or align ecodesign rules with existing obligations under the CPR and standardisation. We understand the enthusiasm of the co-legislators for ecodesign, for those industries that *do not currently have equivalent regulations*. If the proposal is to align ecodesign with the CPR and existing standards, so that ultimately only one

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such system exists in the construction industry, then we could review our previous position and we call on the co-legislators to discuss this subject with us, so that we can find appropriate solutions together.

■ Infrastructure for e-mobility

Whilst we support forward-thinking policy that climate proofs our future buildings and infrastructure, we wonder whether the obligatory installation of vehicle charging points will achieve that aim. FIEC doubts that the case for electric vehicles has been made conclusively and therefore, we question this provision for the categories of buildings indicated in the proposal. At best, such a measure would benefit from further consultation, to establish – amongst other things – the additional costs that will be generated and the risks that will have to be managed, such as safety and fire prevention. We also ask the co-legislators to consider whether:

- the provision of electricity will be sufficient and guaranteed to meet the increase in demand caused by a significant increase in electric vehicles
- the production of batteries for electric vehicles can meet future demand
- the requirement could be limited to pre-cabling, as foreseen for newly built residential buildings and those undergoing major renovations.

Whatever is ultimately decided, public buildings should not be exempt from any eventual obligation to provide infrastructure for e-mobility. Contrary to the implication in the proposed amendment to Article 8, Directive 2014/94/EU does not cover the majority of public buildings. Therefore, this exclusion seems to be unjustified and illogical and we call on the public sector to lead by example with regard to this measure.

■ Smartness indicator – tell us what this means and how it will work!

Whilst FIEC is broadly enthusiastic about reinforcing the use of building monitoring, automation and control, we would like to know more about the proposed *smartness indicator*. What *exactly* will this measure and using which parameters? Who will benefit? What evidence exists of the need for this indicator? What use will be made of the ratings? Will these ultimately lead to penalties and if so, for whom? Who will measure and certify buildings and which buildings will be included? FIEC calls for a more detailed proposal and for a wide-sweeping consultation with the relevant experts in the construction industry. Until such a proposal is on the table, we consider this idea to be no more than a gimmick. On the other hand, the industry can help policy makers to make such an indicator useful, if indeed a clear purpose is established, which can actually help to improve energy efficiency, without introducing additional burdens and costs for either those who construct buildings or those who live in them afterwards.

■ Make the revised EPBD work with the new voluntary assessment framework

DG Environment and the Joint Research Centre have been working for almost three years on a voluntary building assessment framework, to measure environmental performance. As this framework will comprise several indicators, it is imperative that any smartness indicator created by the revised EPBD is coherent in terms of – and perhaps included in - the forthcoming framework, due to be completed in 2017. We urge the co-legislators to scrutinise this specific requirement in particular, but the entire proposal in general, to ensure that it works coherently alongside the new framework. Approving an amending Directive now, which will be duplicated by a voluntary assessment framework later could result in the latter never being accepted or used in the market.