

To the kind attention of **ITRE Members of the European Parliament**

Brussels, 6 February 2023

An ambitious EPDB revision to stimulate renovations for energy-efficient, renewable-based and flexible buildings integrated into the energy system

Dear ITRE Member of the European Parliament,

As a group of European associations committed to the achievement of EU climate goals, we acknowledge the compromises found in view of the forthcoming vote in ITRE Committee on 9 February on the Energy Performance of Buildings Directive (EPBD). This piece of legislation is crucial to decarbonise the building stock, one of the most polluting sectors in the EU, while empowering consumers and shielding them against high energy prices in the long-term.

In particular, we encourage you to:

- **Support the definition of zero-emission building as a new objective for the EU building stock.** The energy performance of a building should be improved thanks to energy savings and a flexible consumption of renewables generated on-site and off-site by consumers acting jointly and in renewable energy communities. This is crucial to strengthen the integrated district approach to building renovation and valorise the contribution of buildings to system efficiency improvements thanks to their demand-side flexibility.
- **Support the development of prosumers through requirements to install solar energy in buildings.** The deployment of on-site renewables, notably in combination with the replacement and installation of other energy-consuming technical building systems, including heat pumps, will increase the energy resilience of European consumers and will hedge their exposure to extreme price variations. Similar measures are already in place in 9 EU Member States and smart financing schemes allow third-party investors to offer solar installations without upfront costs. Crucial is also the requirement for minimal demand response capacity.
- **Improve the ambition for bidirectional EV charging in buildings,** to further integrate road transport in the building sector as a valuable decentralised energy resource. Member States shall encourage bidirectional charging in buildings which are equipped with on-site renewable generation to ensure a clean consumption by EVs, optimal use of their batteries and reduce local congestions.
- **Support the conditionality between carbon footprint and financial incentives,** to be clarified through a user-friendly Renovation Passport, based on the comparison of the energy consumption before and after renovation. However, it should be strengthened by relying on operational GHG emissions to avoid greenwashing and ensure a pay-for-performance approach leading to measurable carbon reductions.
- **Support the request to the Commission to strengthen real-time measurements for Energy Performance Certificates (EPCs).** This should be achieved through a European certification scheme for energy performance metering systems, not limited to energy efficiency meters, in order to embrace a holistic approach and consider all metering devices, including certified sub-meters. This is coherent with the provisions on data exchange that should be further detailed through Delegated and Implementing Acts, with the development of a Digital Building Logbook and the interoperable databases on the actual energy performance of buildings which should be accessible to third parties, including system operators, for a better planning and use of their network.

We encourage Members of the European Parliament to embrace the abovementioned recommendations ahead of the vote in ITRE Committee in order to achieve integrated building renovation fit for the pressing challenges ahead.

We are at your disposal for any clarification you may need.