

To: EU Commission Better Regulation  
DG ENER Unit B3

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## **The Danish Chamber of Commerce's response to roadmap regarding revision of the Energy Performance of Buildings Directive**

The Danish Chamber of Commerce thanks the EU Commission for the opportunity to respond to roadmap regarding revision of the energy performance of buildings directive (EPBD).

### **General remarks**

The revision of the EPBD is part of the "Fit for 55 package" included in the Commission Work Programme 2021. This revision will focus on provisions that are central to delivering a Renovation Wave and that contribute to emission reduction.

The Danish Chamber of Commerce fully supports the EU Green Deal, Climate Target Plan 2030, and Fit for 55 package and their complementary policies.

The revision of the EPBD is an opportunity to secure not only energy efficiency but also more sustainable buildings. The Danish Chamber of Commerce support a more holistic view on the built environment and suggest sustainability criteria are included in the EPBD in order to ensure the uptake and usage of low carbon building materials.

Furthermore, by including non-energy benefit like the impact of buildings on learning abilities, human health and productivity most likely will increase the renovation rate.

### **Specific remarks**

EU: The impact assessment will look at the following options:

- Option 1 – No policy change (baseline scenario)
  - The EPBD remains as it is, without any modification until the review envisaged for 2026 by Article 19 EPBD. The Commission follows the usual procedures to ensure the complete and correct transposition of the EPBD by Member States.
- Option 2 - Non-regulatory measures

- Reinforced non-regulatory policy instruments and additional guidance and support measures, such as technical assistance, information campaigns, training, project financing etc. can lead to increased energy renovation rates.
- Option 3 – Amend the EPBD to translate the actions proposed in the Renovation Wave and the increased ambition towards building decarbonisation into legislation
  - The revision of several provisions of the EPBD will be explored, examining the required scope of the revision. Several sub-options with different measures with different ambition levels will be assessed. The phased introduction of mandatory minimum energy performance standards for different types of buildings (public and private, non-residential and residential) will be a central part of the EPBD revision. Different options for the type, scope, timeline and phasing in of such standards and the level of flexibility for Member States will be assessed.

The Danish Chamber of Commerce recommends option 3 for the revision of EPBD to amend the policy to translate the actions proposed in the Renovation Wave and the increased ambition towards building decarbonization into legislation. We want to emphasize the importance of ambitious climate goals that are shared across EU member states. The EPBD should have equal criteria regardless of whether the building is publicly or privately owned. The EPBD should also be sector and technologically neutral, thereby not creating distortions in trade and competition across EU member states and sectors.

To build upon a long-term strategy that mitigates the negative consequences of the climate crisis, the EPBD should introduce minimum energy performance standards (MEPS). These will assist in achieving long-term carbon emission reduction targets. Furthermore, EU buildings should be carbon neutral by 2050 this will ensure that buildings are environmentally sustainable throughout their entire lifecycle. Certifications for energy performance should also be revisited. These certifications should be equal throughout the EU and fully harmonious. The certificate should include broader parameters to accurately estimate energy performance like management, control, and monitoring mechanisms.

Electrification of the transport sector is on the keys to unlock the decarbonization of the transport sector. We therefore suggest that the provisions in the EPBD related to charging of electric vehicles should be dealt with in a specific EU initiative with this as the sole focus. Establishing a well-functioning market for charging of electric vehicles and the needed infrastructure is essential, but this should not be the focus of the EPBD besides the provision to plan for pre-cable in new buildings as these costs are very limited from the building owner.

The current directive requires businesses to prepare for establishing infrastructure for charging electric vehicles cars in existing buildings under certain conditions. We believe that the costs of establishing charging stations should not be imposed on businesses that own the parking spaces. This should be financed by the market for charging EV's or by other means if there is need for subsidizing. The need for subsidizing the role out of charging stations should not be put on specific business.

The Danish Chamber of Commerce suggests the content of article 8 should be moved to a new legislative initiative covering the issue with the purpose of developing the charging market and related infrastructure. This new legislation should consider charging stations' sustainability and not only cover electricity.

It is beneficial for the green transition to establish easier access to charging for electric vehicles. However, the charging station requirement in front of grocery stores does not make much sense, since grocery store trips typically last 10-20 minutes. Charging stations here will have very little effect on consumers that on rare occasions will make use of the opportunity to charge such small amounts. This means retailers will spend significant amounts establishing these charging stations as well as securing sufficient electric power that, in turn, will not have much value for neither consumers nor the green transition. Therefore, the Danish Chamber of Commerce encourages the Commission to exclude small business and retailers from the criteria of charging stations in the EPBD or preferably a new legislative initiative.

Addressing resource efficiency and circularity principles in order to reduce whole lifecycle emissions, digitalisation, climate resilience and health and environmental standards also requires consideration.

The Danish Chamber of Commerce suggest that the Commission should also consider life cycle assessment (LCA) and total cost of ownership (TCO) in the Renovation Wave and revision of EPBD.

Building renovation has a large potential for innovative, industrialised and digital solutions. The development and uptake of such solutions by EU industry will increase the EU's competitiveness.

The Danish Chamber of Commerce believes that the green and digital transition go hand in hand. The revision of EPBD should increase accessibility, availability, and digitalization meanwhile ensuring that everyone has the potential of living in an energy efficient home as well as mitigating energy poverty.

Best regards,

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