

# Recasting of the Energy Performance of Buildings Directive 2002/91/EC

## GENERAL INFORMATION

Your profile	Organisation
Region	European Union
Which European Union country?	Some EU Member States (for organisations only)
Which EU Member States?	Austria, Belgium, Finland, France, Germany, Ireland, Luxembourg, United Kingdom, (plus Norway & Switzerland).
Organisation name	Eurofuel (The European Heating Oil Association)
Organisation type	Not-for-profit association
Main field of activity	Energy supply

## 1. CLARIFICATION and SIMPLIFICATION ASPECTS

1. Which of the definition(s) or requirement(s) of the existing Directive should be clarified or simplified? Please choose the part(s) of the Directive you refer to:	Article 9 Article 5 Article 6 Article 8
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What do you propose to clarify or simplify in article 5 of the Directive?  
(Max. 1000 characters)

To avoid the use of significant amounts of conventional energy, the only heat pumps which should be considered within the remit of Article 5 must comply with the minimum requirements of the coefficient of performance in Commission Decision 2007/742/EC10 (viz. Regulation (EC) No 1980/2000) of 17 July 2000 on a revised Community ecolabel award scheme. The additional primary energy, usually from electricity, required to power heat pumps must always be carefully considered, because this additional electricity is often derived from polluting, marginal sources, at peak demand times. Also with respect to Article 5, rather than a "carte blanche" endorsement of any District Heating and Cooling, any proposed new systems of this type must be subjected to a careful energetic audit and costs evaluation, to ensure that the proposed scheme is actually energy efficient, and cost-effective, taking into account heat losses in the extended heat distribution system.

What do you propose to clarify or simplify in article 6 of the Directive?  
(Max. 1000 characters)

The 1000 square metres threshold should be abolished, which would then thus enable significant energy savings to be made in typical domestic and smaller commercial buildings, when undertaking renovation works to both the building shell per se, and also to the heating and cooling system(s).

What do you propose to clarify or simplify in article 8 of the Directive?  
(Max. 1000 characters)

The boiler inspection system should have the same 2-year interval requirement for all boilers, irrespective of size, or fuel origin. Therefore, (i) boilers of sizes less than 20 kW rated output should also fall into the same inspection regime; (ii) boilers fuelled by either gaseous, solid or liquid fuels should be treated equally, and therefore should all be inspected at 2-year intervals, to ensure a level playing field between technologies; (iii) boiler inspections should be at 2-year intervals, irrespective of whether the source fuel is of fossil or renewable origin (e.g., pellets- and wood-fired boilers probably require inspections at shorter, rather than longer, time intervals, than the equivalent heat output oil- or gas- fired boilers).

What do you propose to clarify or simplify in article 9 of the Directive?  
(Max. 1000 characters)

Because so much energy is wasted in the summer months owing to inadequate air conditioning systems, particularly in southern Europe, it should be mandatory that these systems also be sized, installed and commissioned by qualified personnel for systems above a certain power output threshold. Similar to boilers, a 2-year regular inspection scheme for air conditioning systems should also be considered, to ensure that such systems are performing adequately, according to design parameters and expectations.

## 2. THRESHOLDS WITHIN THE DIRECTIVE

2.1. Do you propose that the 1000 m2 total useful floor area threshold for existing buildings that undergo major renovation (article 6 of the Directive) be changed or eliminated?

Yes

Which threshold do you propose and why?  
(Max. 1000 characters)

Eliminate the threshold, to enable renovations undertaken on such buildings, and also importantly the heating and cooling systems, to be performed to the same exacting standards regarding energy efficiency, as provided for in Article 4 of the existing directive.

2.2. Do you propose that the 1000 m2 total useful floor area threshold for the requirements on 'alternative systems' (article 5 of the Directive) and/or on the display of the energy performance certificate (article 7(3) of the Directive) be changed or eliminated?

Yes

Which threshold do you propose and why?  
(Max. 1000 characters)

Eliminate the threshold, to enable energy savings to be more widely available to the standards embraced by the Energy Performance of Buildings Directive (EPBD). Renewable energies which meet the same very high standards for overall energy efficiency could be incorporated via the same assessment. The renewable energy technologies used should be subject to provisos described above, under the recommendations made for Article 5. Very high efficiency, hybrid fossil-renewables heating systems offer great potential (e.g., oil heating combined with solar thermal technology, and fuelled by bioliquid blends with heating oil), as acknowledged by the European Parliament in its 2007 Thomsen report on the "Renewable Energies Roadmap". Such hybrid systems should be examined as a priority, being cost-effective, energy efficient and environmentally friendly solutions.

2.3. Do you propose that the thresholds on the rated output of boilers and/or air-conditioning systems subject to regular inspections (article 8 and article 9 of the Directive) be changed or eliminated?

Yes

Which threshold do you propose and why?  
(Max. 1000 characters)

No size threshold is proposed, either lower or upper. The boiler inspection system should have the same 2-year interval requirement for all boilers, irrespective of size, or fuel origin. Therefore, (i) boilers of sizes less than 20 kW rated output should also fall into the same inspection regime; (ii) boilers fuelled by either gaseous, solid or liquid fuels should be treated equally, and therefore should all be inspected at 2-year intervals, to ensure a level playing field between technologies; (iii) boiler inspections should be at 2-year intervals, irrespective of whether the source fuel is of fossil or renewable origin (e.g., pellets- and wood-fired boilers probably require inspections at shorter, rather than longer, time intervals, than the equivalent heat output oil- or gas- fired boilers). The original sizing, installation and commissioning of the boiler, and the system's continued regular professional maintenance, are very important.

## 3. STRENGTHENING OF REQUIREMENTS

3.1. Which new/changed requirement(s) or content concerning the energy performance certificate (article 7 of the Directive) do you consider to have a high impact on realizing energy savings in the buildings sector?  
(Max. 2000 characters)

No response.

3.2. Which new/changed requirement(s) concerning the inspection of boilers (article 8 of the Directive) do you consider to have a high impact on realizing energy savings in the buildings sector?  
(Max. 2000 characters)

The boiler inspection system should have a high impact on saving energy in the building sector. The same 2-year interval inspection requirement should be applied to all boilers, irrespective of size, or fuel origin. Therefore, (i) boilers of sizes less than 20 kW rated output should also fall into the same inspection regime; (ii) boilers fuelled by either gaseous, solid or liquid fuels should be treated equally, and therefore should all be inspected at 2-year intervals, to ensure a level playing field between technologies; (iii) boiler inspections should be at 2-year intervals, irrespective of whether the source fuel is of fossil or renewable origin (e.g., pellets- and wood-fired boilers probably require inspections at shorter, rather than longer, time intervals, than the equivalent heat output oil- or gas- fired boilers). The original sizing, installation and commissioning of the boiler, in conjunction with the design of the overall heating system, and the system's continued regular professional maintenance, are all of crucial importance. For example, condensing boilers can save up to 30% of the energy used to provide the same heat output, compared to some boilers over 15 years in age, especially where the latter have been poorly maintained. Boilers fuelled by renewables should be pushed technologically to have the same excellent efficiencies as current oil and gas fired boilers. Up-to-date training of installers in using cutting-edge design methods and the most modern boiler technology, combining very high efficiency with hybrid fossil-renewable energy systems, is vitally important.

3.3. Which new/changed requirement(s) concerning the inspection of air-conditioning systems (article 9 of the Directive) do you consider to have a high impact on realizing energy savings in the buildings sector?  
(Max. 2000 characters)

Because so much energy is wasted in the summer months owing to inadequate air conditioning systems, particularly in southern Europe, it should be mandatory that these systems also be sized, installed and commissioned by qualified personnel for systems above a certain power output threshold. Similar to boilers, a 2-year regular inspection scheme for air conditioning systems should also be considered, to ensure that such systems are performing adequately, according to design parameters and expectations.

3.4. Due to the complexity and variation of boundary conditions in the 27 Member States (e.g. with regard to the existing buildings stock, outdoor climate conditions, costs of energy, labour and material, taxes, etc.), minimum energy performance requirements are not stipulated at EU level in the existing Directive. They are left for the Member States to define as regards both their definition and parameters instead. What type of approach do you consider feasible and effective which could be laid down at EU level with regard to minimum energy performance requirements for buildings?  
(Max. 2000 characters)

Minimum energy performance requirements and decision-making should remain at the level of Member States. To solve the financing issues highlighted in Section 5.5 ("EU support measures") of the European Commission's "Background Information Paper" on recasting the Energy Performance of Buildings Directive (EPBD) the measures postulated, of: (i) state aid (in accordance with relevant EC directives and associated provisions), (ii) reduced VAT provisions for the labour involved in renovating existing buildings to make them less energy intensive, (iii) use of revenue derived from the Emission Trading Scheme, (iv) appropriately-directed EU Cohesion Policy towards energy efficiency measures, and (v) coordination of Member State-Commission energy efficiency initiatives could all be very useful tools in promoting efficient use of energy in buildings. In addition, sector-specific voluntary agreements could be a very appropriate tool (e.g., in the oil heating sector, amongst Eurofuel's members, these have been very successful, inter alia, in Germany and in Finland). Opportunities should also be exploited by Member States where common ground and aims exist between the EPBD and the existing Energy End-use Efficiency and Energy Services Directive 2006/32/EC. Such opportunities are being exploited by several of Eurofuel's member organisations in EU Member States. Further information can be provided by Eurofuel to the European Commission on all of the above initiatives.

3.5. Which other requirement(s) do you consider to need strengthening, and in which way?  
(Max. 2000 characters)

Article 5, regarding New Buildings. To avoid the encouragement of the use of significant amounts of conventional energy, heat pumps should only be considered which comply with the minimum requirements of the coefficient of performance established in Commission Decision 2007/742/EC10, in accordance with Regulation (EC) No 1980/2000 of the European Parliament and of the Council of 17 July 2000 on a revised Community ecolabel award scheme. The additional primary energy, usually from electricity, required to power heat pumps must always be carefully considered, as this additional electricity requirement often comes from the most polluting, marginal sources, at peak demand times. A careful energetic audit and costs evaluation must be made of any new proposed District Heating and Cooling schemes, to ensure that the proposed scheme is actually energy efficient, taking into account heat losses in the extended heat distribution system. Especially when one takes into account the gains made by enhanced insulation of new buildings, it may not be energy- or cost-efficient to construct capital-intensive district

heating and cooling schemes when low energy houses may only have a “heating season” of some 2 months, and a “cooling season” equally of 2 months or less.

#### 4. THE ROLE OF THE PUBLIC SECTOR

Besides the current requirement of the Energy Performance of Buildings Directive for the public sector to display the energy performance certificate in a prominent place:

Do you consider the public sector should play a stronger role to act as a leading example for energy savings in buildings?

No opinion

#### 5. OTHER

5.1. Do you consider that climate adaptation should significantly influence the level of requirements laid down by buildings regulation?

No opinion

5.2. Do you propose other aspects/ideas than the aforementioned to be included in the recasting of the Energy Performance of Buildings Directive?

No opinion

#### Meta Informations

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