



EuroWindowor feedback on the proposal to recast the EU Energy Efficiency Directive (EED)

EuroWindowor welcomes the adoption of the European Commission proposal to revise the Energy Efficiency Directive on 16 July 2021 and appreciates the opportunity to provide feedback to feed into the legislative debate.

The July Fit for 55 Package represents a good starting point for the upcoming negotiations, setting a strategic framework for Europe to meet its 2030 and 2050 climate objectives. Due to its significant share of emissions, the decarbonization of the European building stock represents a key precondition, which will require ambitious revisions of the Energy Efficiency Directive (EED) and the Energy Performance of Buildings Directive (EPBD).

EuroWindowor particularly welcomes the new Article 3 in the EED, providing a legal basis for the Energy Efficiency First (EE1) Principle. Energy efficiency remains the key tool to decarbonise the building stock, while also delivering on multiple benefits, i.e. improved indoor climate for building owners and occupants. The strong commitment to the EE1 Principle is therefore crucial to ensure a continued focus to invest in energy efficiency measures at Member State level.

Other strong elements of the proposal are the decision to extend the 3% minimum renovation obligation for Member States to meet NZEB standards to all buildings owned by public authorities as well as the increased energy saving obligation. These new provisions should act as a catalyst for national governments and local administrations to show the way and increase the rate and quality of renovations of all public buildings, including schools, hospitals and social housing.

As regards the Energy Efficiency target for 2030, EuroWindowor supports the ambitious and binding target of 39%-41% reduction of primary energy consumption at EU level. Furthermore, the individual Member States should be encouraged to set national targets and make specific strategic plans, prioritized to perform the most cost-effective actions at country level. This can include sector-specific targets and measures. To achieve climate neutrality by 2050, the EU relies on a successful Renovation Wave by at least doubling the annual renovation rate of residential and non-residential buildings across the EU.

Article 8 (1) gives the Member States the opportunity to decide for themselves on how to calculate the quantity of new saved energy over an obligation period, as long as they are able to reach the required total cumulative end-use energy. Article 8 (13) further specifies that if a Member State has not achieved the required cumulative end-use energy savings by the end of each obligation period the Member State can achieve the outstanding energy savings during the next obligation period. This proceeding is dangerous as bigger and more difficult and investment-intensive energy savings will be pushed back on the timeline or that catching up on the targets will become the rule not the exception. This is problematic for two reasons: Firstly, every delay of energy savings works against the realisation of the CO₂ budget from the IPCC-report. In order to realise the CO₂ budget, energy savings need to be done immediate and as fast as possible. Secondly, an often-overlooked aspect is that the building sector has very few capacities to catch up on missed energy savings. This is why we are pledging for a regulation that aims for an early and binding realisation of energy savings in an obligation period.

The EPBD remains the key instrument to secure the technical implementation of the EED's objectives in the building sector. As the EPBD proposal is only scheduled to be published in Q4 2021, we call on the EU Institutions to ensure close alignment between the EED and EPBD revisions. Both revisions represent an opportunity to take a more holistic approach to buildings by better factoring in the multiple benefits of energy renovations, such as comfort and wellbeing but also by factoring in energy balance instead of heat losses only when implementing energy requirements for renovations. In the case of windows, this would result in a more realistic evaluation of expectable energy savings, as both heat loss and solar gains would be considered.

In the upcoming negotiations, we therefore call on the EU Institutions to:

- i. keep the strong legal basis for the EE1 Principle and the exemplary role of the public sector;
- ii. work for adoption of a binding Energy Efficiency target of 39%-41% reduction for primary energy consumption at EU level (compared to projections made in 2007 for energy use in 2030);
- iii. encourage member states to make national targets and specific strategic plans, prioritized to perform the most cost-effective actions at country level which may include sector-specific targets and measures;
- iv. ensure close alignment with the upcoming EPBD revision to ensure they are fully complimentary.

EuroWindowor would highly appreciate the Commission to consider our feedback and we remain available for further discussions.

About EuroWindowor AISBL – EuroWindowor AISBL was founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 19 national associations speak for European window, door and facade manufacturers that are in direct contact with consumers, and thereby having large insights on consumers' demands and expectations. We are at the forefront interacting with dealers, installers and consumers buying windows and doors, and the companies behind the associations cover selling all over Europe.



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