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Oslo, 2022-02-01

Directive of the European Parliament and of the council on the energy performance of buildings - Recast

The Norwegian Green Building Council and Norwegian Property Federation hereby wish to provide input to the EU Commission initiative to the recast of the Energy Performance of Buildings Directive.

We support the ambitions and calls for effective and efficient policy measures. Higher and more concrete ambitions are necessary when revising and implementing the directive towards a greener building stock. The directive must be a catalyst for the most efficient investments in energy improvements in relation to the goal of a greater and faster climate effect. The proposed measures must be ambitious. To get all the important participants involved and ensure a good anchorage and implementation, it is also important that the measures are predictable.

The directive must provide better opportunities for financing and reducing barriers for green investments. The directive entails additional administrative and financial burdens which must be considered, investigated, and made evident.

Energy efficiency must not be seen as a goal alone but should be seen in connection with other sources of CO₂ emissions such as material use, and over the building's lifetime from construction to operation and disposal / renovation / reuse. There must be a broader focus on the building's significance for a green transition, including circular economy, resource efficiency and material use, climate adaptation, generation of waste in the construction and operation phase, recycling, etc.

The directive must facilitate more direct access to building data and usage data - this is crucial for a stronger digitization of buildings.

The following text includes comments for a selection of the articles which we consider particularly important:

Goal - all buildings are zero-emission by 2050

We support the goal of all buildings being without emissions in 2050. The time perspective with about 25 years provides a good horizon for planning and implementing measures for most types of buildings.

In Norway the energy use in existing buildings is mainly based on clean hydropower. The existing building stock will therefore have an energy use almost close to zero emissions. The challenge for such

buildings is to reduce energy consumption, not emissions in connection with operation. However, zero emissions are an important target for new buildings that generate emissions in connection with for example the use of materials.

In Norway the energy efficiency requirements of “The regulations of technical requirements for construction works” (TEK 17) are based on the building’s total net energy. This is different from other European countries. The regulations of TEK 17 also apply when buildings are to be renovated. The taxonomy states that energy consumption must be reduced by 30% in relation to current regulation. This is very difficult to achieve when the regulations of Norway are based on total net energy. This way of calculating means that only measures on the building body are calculated. However, for existing buildings, it is more cost-effective and climate-efficient to implement measures on technical equipment and energy supply, such as the choice of heat pump.

Goal - all new buildings must be zero-emission from 2030

We support the goal of all new buildings being without emissions from 2030. However, this goal will not be relevant for all types of buildings. An example can be temporary buildings. One must therefore take into account that there may be types of building where an exemption should be granted from this requirement. However, the exceptions must not be too broad.

Requirements - raising all existing buildings to energy label E per 2030/2033

We support the requirement of raising all existing buildings to energy label E. Such a requirement must however consider that the buildings have a long service life. Additionally that the renovation of a building is a project that is planned with a long-time horizon. It could be more natural and appropriate to plan the efficient and investment-intensive energy and climate measures at the same time as another upgrade of the building. The building owners must therefore be given a sufficient time horizon for optimal planning and investment in relation to when the directive is implemented. The directive must also take into account that there will be energy-improving investments that are not appropriate because the building is planned to be demolished within a certain number of years.

Requirements - charging point installations when renovating existing buildings

This is a very expensive measure when the parking area is not naturally included as part of the renovation. This can be on account of other more energy-efficient and climate-correct measures in the renovations-project. Such a specific, non-technology-neutral requirement provides little flexibility in the prioritizing of measures and seems to contradict the purpose of the directive.

Financial instruments

Financial instruments must be directed directly at those who are decision-makers and bear the financial investment burden when implementing measures. Tenants and users will be indirectly catered for through lower rents, increased comfort and lower energy costs.

Energy labeling scheme – energy performance class

A new scale for energy label must be harmonized with national conditions in each country. Implementation of new energy performance classes and certificates must be made known and adapted to a time horizon for investment in buildings that is realistic in relation to the target of energy label E as of 2030/2033.

Technology-specific requirements

The directive should be designed so that it is flexible and not technology-specific, in other words strive to be technology-neutral. The requirements for, as an example, building automation and control systems are not technology neutral.

National implementation, including national forces and best practice solutions

The directive must include the possibilities for issuing delegated acts. The EU should remain in the role of demanding results and leaving the choice of regulatory instruments to the Member States.

The revised proposal for the EPBD must take into account that there are differences in national conditions and strengths. The EU must therefore ensure that there is room for implementation of national legislation for the individual country, while at the same time safeguarding the EU's overall objective. The EU should focus on setting Union-wide emission reduction targets with a technology-neutral approach. The EU must monitor the achievement of the goals and be a forward-looking support, for the member states in their energy and climate work, which contributes with innovation, knowledge and experience transfer as well as positive fiscal instruments and management tools.

Norwegian Property Federation (Norsk Eiendom) is the association of leading commercial real estate businesses in Norway. The members are large and small real estate companies.

The Norwegian Green Building Council (Grønn Byggallianse) is a non-profit member association in Norway. Businesses and organisations throughout the entire value chain of construction, property, and installation can be members. The Norwegian Green Building Council aims to promote processes of change so that sustainability becomes second nature for more and more people. We want to be one of the most important catalysts for a more sustainable built environment. We want to be a driving force that helps the industry to change attitudes, increase knowledge, and show that thinking, wanting, and operating sustainably is good, profitable, and fun.

Best regards,

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