

Brussels, 26 July 2017

UEPC COMMENTS ON THE COUNCIL'S GENERAL APPROACH ON THE PROPOSAL FOR A DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL AMENDING DIRECTIVE 2010/31/EU ON THE ENERGY PERFORMANCE OF BUILDINGS

The European Union of House Builders and Developers (hereafter UEPC) would like to share its comments on the EU Council's General Approach on the proposal amending the Directive 2010/31/EU on the energy performance of buildings (hereafter EPBD).

UEPC welcomes the EU Council's negotiating stance agreed by Energy Ministers on 26th June which clearly takes into consideration the need for more flexibility in this field which is in line with our suggestions.

1. Pre-cabling for electric recharging points in newly built residential buildings

UEPC supports the new formulation of new article 8.3 as drafted by the EU Council. Member States seem to have acknowledged the risks of imposing upon newly built residential buildings as well as residential buildings undergoing major renovations, with more than 10 parking spaces, the provision of pre-cabling infrastructure to enable the installation of recharging points for electric vehicles.

Pre-cabling is neither cost effective nor technically wise. Deployment costs for installing the infrastructure to allow e-mobility recharging points and the power supply needed for recharging e-cars are expected to be burdensome for developers and would consequently have a negative effect on the total costs for residential buildings. Moreover, the Commission's provision on pre-cabling does not take into consideration the rapid speed of technological progress and does not reflect the actual demand and offer of e-cars.

Therefore, we welcome the Council's suggestion of excluding on-site infrastructure for electro-mobility from the definition of a technical building system in new article 2.3 and replacing pre-cabling with the installation of the relevant ducting infrastructure (the conduits for electric cables) which would enable only at a later stage the installation of recharging points for electric vehicles for every parking space in new article 8.3. We also support the new exemptions as included in new article 8, paragraphs 3a, 3b and 4.a when it comes to building permit applications or equivalent applications to be submitted within three years from the date of entry into force of the directive and the threshold of 5% of the total major renovation costs not to be exceeded for existing buildings.

2. Definition of 'Smart Indicators'

UEPC supports the Council's position on the definition of 'smart indicators' and welcomes the clarification on their meaning and characteristics as well as the methodology for determining the smartness of a building as provided in new article 8.6 and Annexe Ia. In particular, UEPC strongly



supports the suggestion of a voluntary common EU scheme for rating the smart readiness of buildings to be defined by the European Commission in consultation with relevant sectors by the end of 2019. We believe that voluntary schemes are the best option as their deployment would be the result of a demand-driven approach which would take account of customers' needs and requests.

3. Inspections of heating and air-conditioning systems in residential buildings

While welcoming the improvements to the text set out above, UEPC has serious concerns about the Council's decision to maintain automation and smart indicators as an alternative to both heating and air conditioning system inspection. While remaining committed to the final objective of improving energy efficiency and tackling climate change, we believe that residential private developers and house builders should be given the right to decide which systems to install and whether to opt for automation and/or smart indicators based on a demand-driven approach which would take account of customers' requests. Furthermore, it should be left to the heating and air conditioning system producers to indicate how often and the way in which inspections should be carried out to ensure the safety and functionality of these systems.

However, we support the Council's efforts to increase the flexibility in this field by considering the above-mentioned options as not the only alternatives to physical inspections. In this respect, we welcome the introduction of new articles 14.2a and 15.2a which reintroduce alternative measures as stated in current directive 2010/31/EU articles 14.4 and 14.5.

UEPC considers that the Council's negotiating position represents a good starting point in view of the upcoming negotiations with the European Parliament. We call on MEPs to support similar solutions when voting on MEP Bendtsen's draft report in the ITRE Committee after the summer recess.
