

Brussels, 6th June 2017

UEPC AMENDMENT TO MEP BENDTSEN'S DRAFT REPORT 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 MEP Bendtsen's draft report on the proposal amending the Directive 2010/31/EU on the energy performance of buildings (hereafter EPBD).

UEPC welcomes the new approach adopted by the European Parliament Rapporteur which clearly takes into consideration the need for more flexibility in this field which is in line with our suggestions.

In particular, the UEPC supports targeted amendments on the three following issues:

- the possibility for EU Member States to opt either for pre-cabling or pre-tubing when it comes to recharging points in newly built residential buildings and those undergoing major renovations (amendment n. 30);
- the clarification on the use of building automation as an alternative to the physical inspection of heating and air-conditioning systems in residential buildings (amendments n. 41, 42, 43, 47, 48 and 49);
- the definition of a clear common general framework methodology for identifying what a smartness indicator shall be (amendments n. 34 and 58).

While acknowledging the positive aspects of MEP Bendtsen's targeted amendments to the EPBD, we would like to express our concern about a section of amendment n. 30, notably the sentence referring to *'with the power of at least 7 kW'*.

The same power capacity should not be required for recharging points in residential as in public parking lots. In residential parking, cars will be recharged during the night, providing many hours for recharging the batteries. Also, since the daily driving distance is rather limited, the electrical energy to be transferred will be rather limited. A power supply of at least 7 kW is therefore far above what is necessary to recharge the batteries during the night. In public parking, the time available for recharging is typically limited, and the need for high power capacity recharging points much larger.

Even though the new pre-tubing or pre-cabling requirement will contribute to increase the construction costs of residential housing, these costs must be considered limited as compared to the total costs of providing a power capacity of at least 7 kW at each recharging point. Such a 7 kW requirement will significantly increase the investment costs in terms of the need for larger convertors and even upgrading of the local grid, and it will also have a negative impact on the electricity tariffs the consumers have to pay.

As the deadline for tabling amendments in the ITRE Committee level is approaching, we call on ITRE MEPs to take stock of UEPC's comments and suggestions and to support its request to delete any reference to 7 kW from amendment n. 30 as tabled by MEP Bendtsen.



Provision	MEP Bendtsen's draft report	UEPC proposal
Amendment 30 Article 1 – paragraph 1 – point 5 – point b Article 8 – paragraph 3	'3. Member States shall ensure that new residential buildings and those undergoing major renovations related to the electrical infrastructure of the building or the adjacent or built-in parking lot , with more than ten parking spaces, include the adequate pre-cabling or pre-tubing with the power of at least 7kW to enable the installation of recharging points for electric vehicles for every parking space.'	'3. Member States shall ensure that new residential buildings and those undergoing major renovations related to the electrical infrastructure of the building or the adjacent or built-in parking lot , with more than ten parking spaces, include the adequate pre-cabling or pre-tubing with the power of at least 7kW to enable the installation of recharging points for electric vehicles for every parking space.'