



Feedback EPBD consultation

GIH Bundesverband e.V.

Die bundesweite Interessenvertretung für Energieberater

The GIH Federal Association was founded in 2001.

As an umbrella association of 13 member associations, the GIH represents approx. 2,500 qualified energy consultants nationwide. Our members are craftsmen, technicians, engineers, architects, and scientists.

Doubling the renovation rate of buildings is key for Europe to reach its higher climate targets, to kickstart a green recovery from the current economic crisis and to provide modern, healthy and comfortable places to live and work for all Europeans. We therefore strongly endorse the Renovation Wave agenda and welcome the EPBD revision. The EPBD must be the core contributor to achieving the Renovation Wave's aims, complemented by a strengthened EED and RED. We particularly suggest focusing on the following elements of the EPBD which promise to have the highest impact on renovation activity and climate protection:

- 1. Minimum energy performance standards:** We unequivocally support the plan to introduce binding minimum energy performance standards (MEPS) for the worst-performing existing buildings with the highest running costs and energy savings potential. A European MEPS framework should give enough flexibility to Member States to adapt to local conditions but must be robust enough to ensure a significant increase in renovation activity even if a Member State decides to implement only what is strictly required by the Directive. It must be ensured that Member States can embed their MEPS in financial and technical support programmes to enable compliance and safeguard social fairness, augmented by favourable State Aid rules and European assistance.
- 2. Energy Performance Certificates and Data Availability:** A revision of the energy performance certificates (EPCs) should upgrade their quality across Europe, allowing them to be widely used as tools to determine building performance for MEPS classification. National EPC databases must be required to be far more accessible to enable transparent

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monitoring, benchmarking, and analysis. Beyond the EPCs, up-to-date energy and carbon performance data of all publicly owned buildings should be transparently published on a central web portal in each member state for the same purposes.

3. **Prioritising Renovation:** The embodied energy, carbon and other resources contained in already existing buildings should not needlessly be discarded. That is why the EPBD should establish a binding requirement for public authorities to conduct building lifecycle assessments when considering whether to renovate the buildings they own or to demolish them in favour of new construction.

This revision of the EPBD has the potential to give building renovation in Europe the boost it needs to turn into an engine of climate protection and green, long-term jobs. We urge the European Commission to propose changes that are truly “fit for 55” and to guard against weakening any of the existing provisions in the EPBD.

