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2021-04-23

Eurovent feedback on second EPBD stakeholder workshop

In a nutshell

In the below, Eurovent provides its feedback following the second stakeholder workshop for the revision of the EPBD. In short:

- **MEPS are key to achieve decarbonisation of the building stock by 2050**
- **Health and comfort aspects are crucial to identifying worst performing buildings**
- **Sufficient harmonisation of the MEPS framework should be ensured at EU level**
- **The EPC framework needs to be improved before it can be linked to MEPS**

Key elements

The phased introduction of EU-wide MEPS would be effective at overcoming barriers to renovation if combined with proper funding, guidance, and enforcement mechanisms. Given the renovation inertia that must be overcome, it is also important that the MEPS be sufficiently ambitious. The pace of implementation can be traced backward in time from the end objective in 2050.

Targets

MEPS should be targeted at the worst performing buildings, which have the greatest improvement potential. That said, it needs to be clarified what is meant by “worst performing”. Performance metrics should not just be linked to energy consumption or GHG emissions. They should also include IEQ, health, wellbeing, and comfort aspects. The provision of healthy and comfortable indoor spaces is why we build buildings in the first place and why we spend energy on them. Put differently, health and comfort metrics would show whether energy in buildings is spent *well*. From this perspective, the worst performing buildings are those that fail to provide health and comfort, as these are the buildings that do not perform their primary function. The building elements to be targeted are those with the greatest impact on both energy consumption and IEQ.

Harmonisation

Although sufficient flexibility should be left to Member States to adapt to national or local particularities in setting up the MEPS, Eurovent strongly supports deep harmonisation, which would:

- Enable better synergies with EU product-level legislation, including Ecodesign
- Enable economies of scale and the standardisation of renovation solutions
- Reduce uncertainty and administrative burdens
- Facilitate comparisons and benchmarking
- Avoid loopholes

Link to the EPC

Linking MEPS with the EPC has clear advantages. For example:

- The EPC framework provides an existing infrastructure upon which to build the MEPS
- The EPC could serve to systematically identify worst performing buildings
- The EPC would help make MEPS understandable for homeowners and tenants

That said, there are important shortcomings with the EPC, which would have to be addressed first:

- Many EPC are design-based and do not reflect actual or measured performance
- There are persistent problems with data consistency and the repeatability of assessments
- The lack of harmonisation between national EPC risks creating loopholes if linked to MEPS
- EPC can go a very long time without being renewed
- EPC do not systematically include IEQ, health, wellbeing, or comfort indicators at present

Eurovent and transparency

When assessing position papers, are you aware whom you are dealing with?

Eurovent's structure rests upon democratic decision-making procedures between its members and their representatives. The more than 1.000 organisations within the Eurovent network count on us to represent their needs in a fair and transparent manner. Accordingly, we can answer policy makers' questions regarding our representativeness and decisions-making processes as follows:

<p>1. Who receives which number of votes?</p> <p>At Eurovent, the number of votes is never determined by organisation sizes, country sizes, or membership fee levels. SMEs and large multinationals receive the same number of votes within our technical working groups: 2 votes if belonging to a national Member Association, 1 vote if not. In our General Assembly and Eurovent Commission ('steering committee'), our national Member Associations receive two votes per country.</p>	<p>2. Who has the final decision-making power?</p> <p>The Eurovent Commission acts as the association's 'steering committee'. It defines the overall association roadmap, makes decisions on horizontal topics, and mediates in case manufacturers cannot agree within technical working groups. The Commission consists of national Member Associations, receiving two votes per country independent from its size or economic weight.</p>
<p>3. How European is the association?</p> <p>More than 90 per cent of manufacturers within Eurovent manufacture in and come from Europe. They employ around 150.000 people in Europe largely within the secondary sector. Our structure as an umbrella enables us to consolidate manufacturers' positions across the industry, ensuring a broad and credible representation.</p>	<p>4. How representative is the organisation?</p> <p>Eurovent represents more than 1.000 companies of all sizes spread widely across 20+ European countries, which are treated equally. As each country receives the same number of votes, there is no 'leading' country. Our national Member Associations ensure a wide-ranging national outreach also to remote locations.</p>

Check on us in the [European Union Transparency Register](#) under identification no. 89424237848-89.

We are Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies – thinking 'Beyond HVACR'

Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn EUR, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level playing field for the entire industry independent from organisation sizes or membership fees.

Eurovent's roots date back to 1958. Over the years, the Brussels-based organisation has become a well-respected and known stakeholder that builds bridges between the manufacturers it represents, associations, legislators and standardisation bodies on a national, regional and international level. While Eurovent strongly supports energy efficient and sustainable technologies, it advocates a holistic approach that also integrates health, life and work quality as well as safety aspects. Eurovent holds in-depth relations with partner associations around the globe. It is a founding member of the ICARHMA network, supporter of REHVA, and contributor to various EU and UN initiatives.