

Dear Member State representative,

In view of the trialogues on the revision of the Energy Performance of Buildings Directive (EPBD), [EPEE](#), representing the heating, cooling and refrigeration industry in Europe, calls on EU Member States (MS) to align their position to the report adopted by the European Parliament (EP) through the Industry, Research and Energy (ITRE) Committee vote on 11 October.

EPEE welcomes the balanced and pragmatic approach of the rapporteur, Mr Bendtsen, supported by a broad political consensus in the EP. Given that heating and cooling have been identified and projected in the long term as the EU's biggest energy consuming sector, the revision of the EPBD offers a major opportunity to significantly reduce energy costs for building owners and occupants.

According to a number of studies¹, energy savings in buildings, ranging from 20% to more, can be achieved by pragmatic, capital-light, fast payback measures focusing on Technical Building Systems (TBS), Building Automation and Controls (BACS) and inspections.

Therefore, EPEE calls on Member States to:

- **Support the improvements voted by the ITRE Committee to reinforce the focus on BACS** in order to allow owners to continuously monitor the performance of their buildings and make corrections when problems arise (Art. 2.16a, 14.2 & 14.3 (similar Art. 15.2 & 15.3));
- **Support a more efficient and effective framework for TBS** (ITRE Art. 2.3, 2.17, 8.5 & 8.5a under actual usage conditions);
- **Refrain from limiting system performance assessment to “altered parts”**, as this is in contradiction to the objective of system performance optimisation of a given TBS (Art. 8.5);
- **Support the strengthening of Articles 14 and 15 on the inspections of TBS of heating and air-conditioning systems** and reject the introduction of “adequate advices” as they will not help to maintain the expected and rated performance over the products’ lifetime, and will not deliver on the much needed energy saving². Considering that both ITRE and the Council position propose to increase the threshold for inspections from 20 kW to 70 kW, weakening the ambition through alternative measures to inspections such as “adequate advices” would diminish significantly the impact of inspections;
- **Fasten, enhance, and promote the implementation and direct use of the recently adopted CEN EPB-standards** establishing a common European wide, transparent and holistic building performance calculation methodology. It shall strengthen the internal market for the uptake of

¹ [DG Energy](#) (2015): Highlights the importance of an integrated control system and demonstrates that building controls are key to reduce energy consumption in existing commercial and industry facilities

[Waide Strategic Efficiency](#) (2014): Proper application of building automated technology and controls has the theoretical potential to save about 22% of building energy consumption by 2021

[Ecofys Study](#) (2017): Optimising the energy use of technical building systems

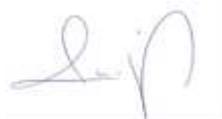
[Cardonnel Ingénierie](#) (2015): Replacing thermal heating and cooling equipment can result in energy savings of 25 to 40% combined with payback times of 5 to 10 years depending on the type of the building vs. 24 to 28 years for investments into upgrading the envelope of the same buildings

² European Commission's [Impact Assessment](#) and the [national reports](#) on alternative measures to the regular inspections

innovative, clean, cost and energy efficient solutions supporting the Member States in achieving the NZEB targets and a drastic reduction of energy consumption in buildings.

I remain at your disposal should you have any questions, and would like to request a meeting to discuss this issue further at your convenience.

Yours sincerely,



Andrea Voigt,
Director General EPEE

ABOUT EPEE:

The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of 40 member companies, national and international associations.

EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment.

EPEE member companies have manufacturing sites and research and development facilities across the EU, which innovate for the global market.

As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies. Please see our website (www.epeeglobal.org) for further information.

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