

Brussels, Wednesday 26 October, 2016

Dear Mr Nociar,

In view of the upcoming revision of the Energy Performance of Buildings Directive (EPBD), EPEE, representing the heating, cooling and refrigeration industry in Europe, calls on the European Commission **to strengthen the focus on Technical Building Systems** (Art. 8) as a way to leverage the huge energy savings' potential related to optimised generation, distribution, storage and emission of heating and cooling.

We consider that optimizing the energy performance of Technical Building Systems is an indispensable step on the road to modernizing Europe's building stock and to meet our 2050 energy and climate goals. Key to optimized Technical Building systems is to ensure effective building automation and control. This does not require invasive renovation measures, pays back quickly and has no lock-in effects.

However, despite these obvious benefits, the great potential of optimizing energy performance of Technical Building Systems has not been exploited yet. For example, energy efficient technologies such as heat pumps are available but have still not been deployed in a broad enough scale. Basic control functionalities of heating and cooling systems as well as regular service and maintenance are often missing or being neglected, although they could trigger energy savings of over 30%¹ at very low payback times.

Strengthening the focus on Technical Building Systems is an efficient way to address these shortcomings and is much needed to overcome well-known market barriers such as split incentives between homeowners and tenants, lack of investment and of awareness. This is true for both, residential and non-residential buildings. Indeed, residential buildings account for 60% to 90% of the floor area, depending on the Member State, and the main energy cost driver is heating. Therefore, any policy that tackles the current shortcomings must keep residential buildings in focus.

Finally, we acknowledge that inspections of Technical Building Systems may become redundant if and when continuous monitoring and maintenance are successfully implemented. However, as long as this is not the case, inspection requirements including the need to act on the findings of the inspections, are essential to tap into the huge energy savings potential of buildings and on the performance improvement of these Technical Building Systems. Therefore they need to continue to apply.

The revision of the EPBD, and in particular a strengthened Article 8 on Technical Building Systems, is a great opportunity and the right track to trigger the urgently needed improvements. As part and parcel of the EU's energy efficiency acquis it strongly contributes to a gradual transformation of the EU building stock into "smart" buildings that are integrated in the energy and electricity systems, giving direction to industry for investments into R&D, innovation, smart technologies and digitalisation.

¹ [Rénovation énergétique](#), Etude Fedene – Cardonnel, CARDONNEL Ingénierie, May 2014

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.