

22 February 2012

## European Partnership for Energy and the Environment (EPEE) - Feedback on GPP criteria for Office Buildings

The European Partnership for Energy and the Environment (EPEE) would like to thank the European Commission for providing the opportunity to express our views on the development of GPP criteria for Office Buildings. Please find our main concerns below.

### General

- **Consideration of EPB and RES Directives**

The European Partnership for Energy and the Environment (EPEE) believes that the EU GPP criteria for Office Buildings should assist all stakeholders (Member States, public builders/procurers, manufacturers, etc.) in reaching the EU's and Member States' mid- and long-term goals in light of the **European Energy Performance of Buildings Directive (EPBD II)** and more specifically regarding the **nearly zero energy buildings (nZEB)** target.

We also refer to the **Renewable Energy Sources Directive** which states under Art. 13 (5) that *"Member States shall ensure that new **public buildings**, and existing public buildings that are subject to major renovation, at national, regional and local level fulfil an **exemplary role** in the context of this Directive **from 1 January 2012** onwards. Member States may, inter alia, allow that obligation to be fulfilled by complying with standards for zero energy housing, or by providing that the roofs of public or mixed private-public buildings are used by third parties for installations that produce energy from renewable sources."*

- **EPEE would like to underline that these crucial aspects of the EPBD II Directive and of the RES Directive should therefore be properly considered by the Commission when establishing GPP criteria for Office Buildings.**

- **EU standards**

It should be avoided that public procurers in different Member States apply a myriad of (calculation) methodologies and the like, and thereby unnecessarily increasing the burden on suppliers to demonstrate compliance with their "specific" requirements.

- **Therefore the EU GPP criteria for Office Buildings should take into account existing EU standards and those under development in order to support their application by Members States.**

- **Performance based approach**

In line with the Lead Market Initiative (Section “Sustainable Construction”) “ends” rather than “means” should be considered, and buildings should not be seen as merely the sum of their components. The public procurer should be able to define what the desired performance of the building is, i.e. what the building is required to do, rather than having to try prescribing how this should be done. This would also allow designers and other contractors to make the best combination of choices (incl. technologies) which ultimately deliver the best result in the most cost-efficient manner.

- **A prescriptive approach is known to hinder innovation. EPEE believes that the EU GPP criteria for Office Buildings should stimulate a performance based approach rather than a prescriptive approach.**

- **Commissioning**

To ensure that all the requirements set are effectively attained and also to ensure that products and systems work as intended, the aspect of commissioning is crucial.

- **EPEE would like to urge the Commission to pay due attention to this aspect in the setting of GPP criteria, as this is an important verification method for all public procurement criteria.**

- **Further general comments**

In regard to the terminology used, proper definition is required to avoid differing interpretations across Member States and other stakeholders and as to make it more clear which requirements potentially need to be met and by whom.

These terms include

- Contractor;
  - Less polluting energy sources;
  - Net, final and primary energy;
  - Building and building site;
  - Major renovation;
- **For terms as “renewable energy”, we suggest explicitly referencing to the respective – in this case RES – Directive.**

## **Criteria 1 – 3: Energy consumption, use of renewables and energy monitoring**

- **Energy consumption**

The GPP criteria should support the goals of the EU Sustainability Roadmap and support not only an increase in the energy efficiency of office buildings but also decrease the reliance on fossil fuels, as this is undeniably connected to CO2 emissions and (un-)sustainable supply.

- **EU GPP criteria for Office Buildings should thus support end-use energies which have the highest potential for decreasing CO2 emissions as well as for supporting sustainable energy supply.**

- **Use of renewables**

Bearing in mind that the intention of GPP criteria is to procure *“goods, services and works with a reduced environmental impact throughout their life-cycle compared to goods, services and works with the same primary function that would otherwise be procured”*, this also requires that these buildings, in terms of the criterion at hand, outperform buildings that “only comply” with legal requirements. Referring to the comment above, saying that the EU GPP criteria for Office Buildings should take into account the provisions of the EPBD and RES Directives, it has to be outlined that EPBD II also calls for a minimum use of renewable energies under its definition of nZEB.

- **EPEE therefore calls for appropriate support of renewables in order to fully respect the intention to procure the most efficient technologies and to be in line with existing EU legislation.**

- **Energy monitoring**

In our view, only systems minimizing the need for occupants’ interference and thereby optimizing building performance should be taken into consideration to “comply” with this criterion. We hereby think of systems that allow for instance error prediction based on data monitoring, malfunction detection and fixing, energy saving tuning etc.<sup>1</sup>

- **EPEE supports the inclusion of a criterion related to energy monitoring but this criterion should positively support the installation of value adding monitoring systems, thus going beyond mere measuring and reporting of energy consumption, which leave further improvement only to the people managing the system.**

## **Criterion 10: Indoor air quality (IAQ)**

EPEE supports the setting of comprehensive **IAQ criteria** rather than merely setting a criterion for minimum ventilation rates. However, again, we feel that the referral to national standards should be avoided as much as possible when discussing GPP criteria.

We also note that simply demanding “higher” ventilation rates may not ensure a higher level of IAQ and that verification of compliance with a standard would not even consider the need to achieve “higher” rates (*discrepancy requirement and verification method*).

- **EPEE would like to suggest that where available, reference should be made to European (or even international) standards.**

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<sup>1</sup> For clarification: We do not mean systems limiting the ability for users to regulate their own comfort settings

- We would also like to urge the Commission to allow different types of technologies to address IAQ issues, including for instance the use of air purifying technology to limit the amount of fresh air required, as to potentially limit the impact on energy consumption whilst maintaining the desired IAQ level.
- Further to this we would like the Commission to consider the introduction of an IAQ monitoring system as an additional criterion, so as to ensure that the desired IAQ is maintained during the entire use phase of the building.

#### **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 and national associations across Europe realising a turnover of over 30 billion Euros and employing more than 200,000 people in Europe. 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. *For more information please visit: [www.epeeglobal.org](http://www.epeeglobal.org).*

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