



Brussels, 14 December 2017

## **A once-in-a-decade opportunity to strengthen Indoor Environment Quality, lower energy consumption of buildings' owners and occupants, and empower consumers**

Dear Deputy Permanent Representative,

The current review of the Energy Performance of Buildings Directive (EPBD) offers a unique opportunity to strengthen the impact of Technical Building Systems (TBS), as a way to drive the much needed improvements in the existing and future building stock and promote systems and solutions that result in low energy consumption, high Indoor Air Quality (IAQ), increased safety and consumer empowerment while significantly reducing energy costs for building owners and occupants.

Today, despite their obvious benefits, basic building automation and control functionalities of heating, cooling, ventilation systems, lighting and blind integration as well as regular service and maintenance are often missing or being neglected.

In view of the next trilogue meeting, our associations – active in the heating, cooling, refrigeration, air-conditioning, and ventilation industries – jointly renew their call for an ambitious EPBD and a strengthened focus on TBS for the sake of citizens' health, comfort and productivity. We specifically urge EU Member States to align their position to the forward looking report adopted by the European Parliament:

- We support mandatory inspections requirements for large buildings and building automation and Controls requirements for large non-residential buildings for heating, air-conditioning and ventilation systems (Articles 14 and 15);
- We caution that programmes for stand-alone “adequate advice” cannot replace inspections and will generally not lead to any improvement and maintenance of the heating, ventilation and cooling systems;
- We support the introduction of a smartness indicator, as a useful tool to assess the technological readiness of the building to control its own energy consumption, indoor air quality, and comfort levels, and to interact with the grid to balance energy demand;
- We support a more efficient and effective framework for Technical Building Systems, which refers to both energy efficiency and indoor air quality (under actual usage conditions); and
- We support the application of harmonized energy performance calculation methods in all EU Member States (Annex I).



We trust that you will be able to take our considerations into account, and we are at your disposal to discuss the subject further.

Yours sincerely,

Olivier Janin, Secretary General, AREA  
John Saffell, Steering Committee Chairman, CoGDDEM  
Thomas Nowak, Secretary General, EHPA  
Andrea Voigt, Director General, EPEE  
Simone Alessandri, Director Governmental Relations, Eu.bac  
Lasse Alsterberg, Chairman, EUHA  
Felix Van Eyken, Secretary General, Eurovent  
Russell Patten, Secretary General, EVIA  
Anita Derjanecz, Managing Director, REHVA

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**About AREA:** AREA represents European refrigeration, air conditioning and heat pump contractors. Established in 1989, AREA voices the interests of 23 national associations from 20 countries representing 13,000 companies employing 110,000 people and with an annual turnover approaching € 23 billion.

**About CoGDDEM:** [CoGDDEM](#) is a British and European trade association assisting the industry in designing acceptable (British, European and international) codes and standards and promoting the value of high-quality gas equipment and services. In particular, CoGDDEM focuses on raising awareness of the dangers of carbon monoxide (CO), carrying out awareness and education campaigns in this field, promoting gas safety and the use of CO alarms across Europe.

**About EHPA:** The European Heat Pump Association represents 120 members across the heat pump industry value chain and promotes awareness and deployment of heat pump technology in Europe. All activities aim at creating a market environment that facilitates faster development of heat pump technology to unleash its benefits, of efficient heating and cooling using renewable energy, on a European level. For more information, please visit: [www.ehpa.org](http://www.ehpa.org)

**About EPEE:** The European Partnership for Energy and the Environment ([EPEE](#)) represents the heating, cooling, 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 realise 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, who service and maintain our equipment. EPEE members have manufacturing sites and research and development facilities across the EU, which innovate for the global market.



**About eu.bac:** eu.bac is the European Building Automation and Controls Association. It represents the major European manufacturers of products and systems for home and building automation. Its vision is a world where energy efficient, sustainable, healthy and comfortable buildings are achieved through the optimal application of home and building controls, automation systems and services. eu.bac has founded the European Association of Energy Services Companies (eu.esco) for promoting Energy Performance Contracting as the economically sustainable solution for improving the energy performance of existing buildings using the guaranteed energy savings to pay for the installation. For a full and updated overview of our membership, please see [www.eubac.org](http://www.eubac.org).

**About EUHA:** The Electric Underfloor Heating Alliance – EUHA – promotes electric underfloor heating as an affordable and efficient part of the solution for the objective of decarbonized buildings within a new smart electricity grid infrastructure. The Alliance brings forward well-performing, higher efficiency electric underfloor heating systems, providing cost-effective, affordable and efficient comfort heating. The future is electric, and sparks with opportunities to improve how we live and how we consume. Electric underfloor heating is one of the best placed technologies to answer tomorrow’s demands for comfort and sustainability. EUHA works in close cooperation with the EU institutions and other stakeholders while providing information and advice on how to improve the sustainability of the systems. The Electric Underfloor Heating Alliance EUHA stands for building regulations that make the best of the future.

**About Eurovent:** Eurovent is Europe’s Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe, the Middle East and Africa 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 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. Website: <https://eurovent.eu/>

**About EVIA:** The European Ventilation Industry Association (EVIA) was established in Brussels in July 2010. EVIA’s mission is to represent the views and interests of the ventilation industry and serve as a platform between all the relevant European stakeholders involved in the ventilation sector, such as decision-makers at the EU level as well as our partners in EU Member States. Our membership is composed of more than 35 member companies and 6 national associations across Europe, realising an annual turnover of over 7 billion euros and employing more than 45,000 people in Europe.

**About REHVA:** REHVA, the Federation of European HVAC Associations, founded 1963, joins European associations in the area of building engineering services representing more than 100.000 HVAC engineers



and building professionals. REHVA is the leading independent professional HVAC organization in Europe, dedicated to the improvement of health, comfort and energy efficiency in all buildings and communities. It encourages the development and application of both energy efficiency and renewable energy technologies.