

Cerame-Unie position on the revision of the Energy Performance of Buildings Directive (EPBD)

Energy efficient construction and renovation contribute to people's well-being and productivity, and help tackling today's challenges: they create local jobs, contribute to reducing energy poverty and to the fight against climate change.

The revision of the EPBD is the opportunity to continue and improve the legal framework for the promotion of energy efficient buildings, taking into account the learnings from the last years. In this context, we would like to make the following recommendations:

1) Use a holistic approach when calculating the energy performance of buildings

- Cerame-Unie **supports the use of primary energy demand as indicator, as it is the most appropriate for calculating energy performance** of buildings. It enables to take into account the building as a whole, including the building envelope and all technical building systems (equipment for heating, cooling, ventilation, hot water, lighting etc.) as well as the renewable energy produced on-site or nearby. This ensures that the most cost- and energy-efficient choices are made for each building.
- **Putting requirements on the performance of single building components taken separately does not make sense.** This has however been done in some implementing legislation at national level, focusing on U-values of building components or thermal requirements on the building envelope. Such situations shall be avoided thanks to a precise definition of energy performance calculation, based on European standards (E.g. ISO EN 13790 and CEN/TR 15615). Furthermore, member states use different methodologies for calculating the energy performance of buildings. For instance, some member states simply use the U-value. However, the standard ISO EN 13790 is not considered by some member states but is the best available tool to calculate the energy performance of buildings and takes into account the thermal mass of a building.
- **Member states shall be encouraged to include all kinds of renewable energy solutions** in the calculation of the primary energy demand, including district heating & cooling. Hence, it shall be possible to use the most efficient renewable energy sources available on-site or nearby a building.
- **Finally, we welcome the fact that indoor air quality will be given more weight in the assessment of buildings.** Keeping a sufficient level of natural ventilation in the building is crucial for the health and well-being of the inhabitants.

2) Better value the contribution of thermal mass to buildings' energy performance

- **A high thermal mass participates to the well-being and comfort of inhabitants both in summer and winter.** With climate change, heat waves will be more and more frequent, it is thus necessary to avoid overheating of buildings in summer. In addition, cooling is by far more energy consuming than heating. Houses are built for several decades and shall be prepared now for this

challenge. In that view **the contribution of thermal mass to the reduction of overheating shall be better valued in the methodology framework in Annex I**. In point 3(a)(iii), not only passive heating but also passive cooling shall be taken into consideration.

- **In addition to cooling, a high thermal mass contributes to the building's longevity, and plays an essential role in making the living environment more stable and comfortable.**

3) Ensure that housing remains affordable

- Energy performance requirements shall be established so that housing remains affordable. If one wants consumers to invest in energy-efficient renovation or new construction, **the time for return on investment shall be reasonable** and take into account the lifespan of the concerned building element(s).
- It is also important to **ensure the quality of the products used**. Products with a long life time ensure a maximum return on investment.
- **The “smartness indicator” has to be defined in that context**. “Smart” shall not necessarily mean “with more electronic devices”. A “smart” building is energy efficient thanks to intelligent building design and combination of materials, rather than complex and expensive devices. Moreover, the lifespan of such electronic devices can be short and therefore the costs associated with their maintenance and/or replacement cannot be neglected.

4) Promote both renovation and new construction

- It is sometimes more efficient to entirely re-build a building than to renovate an old one. In addition, a new building can be more energy efficient, and will be better adapted to new social needs as well as to recent urban developments around it. Therefore **renovation and new construction shall receive the same fiscal and financial incentives**.
- In addition, **new construction shall be understood in its two dimensions**: construction of a completely new building, or demolish and replacement of an old building.

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Cerame-Unie aisbl

Rue Belliard 12 - 1040 Brussels - Tel: +32 2 808 38 80 - Fax: +32 2 511 51 74
sec@cerameunie.eu - www.cerameunie.eu - twitter.com/CerameUnie
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