RENEWABLE ENERGY IS TOO VALUABLE TO BE WASTED

11 September 2017

Our associations represent EU manufacturers of innovative construction products and raw materials for the building envelope. The building envelope is the physical separator between the interior and exterior of a building. Components of the envelope are typically: walls, floors, roofs, windows and doors. We have come together to call for a policy framework that truly up-scales speed and depth of renovation of buildings in the EU.

A highly performing building envelope is often taken for granted, but it necessitates a supportive policy framework. As such, we draw your attention to the fact a good building envelope generates the highest thermal comfort and avoids this waste. However, the current EPBD proposal puts the Energy Efficiency First principle in jeopardy.

Policy Recommendation:

- EPBD Annex I: The proposed discounting of both on-site and off-site renewables puts in jeopardy the logic of reducing energy demand first. **The discounting of renewable energy production must be removed from Annex I EPBD**.

Justification:

- 80% of energy consumed in a building is for heating and cooling, **reducing energy waste should be a key priority**. Annex 1 of the EPBD only requires evaluating the building's energy performance by an indicator of primary energy use and opens the possibility to discount renewable energy produced on site or nearby.
- **This discounting possibility weakens the definitions of 'nearly zero energy building' and dilutes the subject matter of the EPBD.** It may yield misleading information because a change in the primary energy mix (e.g. an increased share of renewable electricity in the electricity mix) would improve the apparent performance of the building, without actually decreasing energy consumption of the building or improving the thermal comfort of its occupants.
- The **installation of renewable energy production nearby,** which is incentivized by other legislations including on the promotion of renewable energy[1], **would actually become an alternative to an improvement of the building envelope, whilst both are needed.** The Energy Efficiency First principle should be better acknowledged to recognize the priority to be given to low energy demand, independently from energy supply changes, because of its own value: thermal comfort, reduction of peak demand facilitating a more flexible renewable energy supply, etc. Renewables have an essential role to play towards the achievement of our GHG reduction target but their use needs to be built upon tapping the full energy efficiency potential in buildings.
- **Energy still needs to be paid for.** Energy produced from renewables coming from the grid would be hidden to consumers while they will still be paying for it.

[1] See here the Buildings Performance Institute paper on Primary Energy Factor which argues that the current approach, using the Primary Energy Factors (PEFs) is detrimental to understanding the real energy performance of a building.