

EAE's position on the draft implementing regulation 'Smart' buildings - smart readiness indicator (arrangements for rollout of scheme)

The European Association for External Thermal Insulation Composite Systems (EAE) thanks for the opportunity to comment on the European Commission's draft implementing regulation on the arrangements for the rollout scheme of the 'smart' buildings - smart readiness indicator.

The EAE wonders if the concept of introducing a new and separate certificate for the smart readiness indicator (SRI) leads to the intended effects. We fully support the Commission's approach to raise awareness of the need to significantly improve the energy performance of Europe's 210 million buildings. As most of these buildings will be there in 2050, and as the building stock accounts for 40% of EU's total energy demand and 36% of total CO₂ emissions, the Renovation Wave is urgently needed to achieve the 2050 objectives of a decarbonized European economy. Any delay will make the challenge even harder.

To make sure Europe's buildings of 2050 are carbon-neutral, new buildings need to comply with the future standards already today. Even more important: the renovation rate of the existing building stock needs to increase from currently 1% to 3%. As a co-benefit improving the energy performance of buildings can significantly contribute to the post Covid-19 recovery:

Current expenditure on renovations would need to increase from its annual average of approximately €245 billion per year to €735 billion per year. It is estimated that this would employ an additional 2-4 million people in the European construction industry.[1]

Neither building insulation nor smart technologies or the use of renewable energy sources alone will lift the huge potential of GHG savings in the building sector. Considering this, the EAE has concerns that the rollout of the SRI as stand-alone certificate might lead to confusion at least among private investors if not communicated carefully. One building might have a mandatory energy performance certificate (EPC), a voluntary environmental certificate and in the future a voluntary SRI certificate. Interpretation of the different approaches and the different content might be well-understood by experts. However, many building owners might be confused and tend to draw misleading conclusions. A more holistic approach should be considered. Passive solutions to reduce the energy demand (efficiency first) in combination with flexible and renewable solutions would create best results on a building level.

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Position paper

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Sources

- [1] European Commission, (2019). Comprehensive study of building energy renovation activities and the uptake of nearly zero-energy buildings in the EU

About EAE

The European Association for External Thermal Insulation Composite Systems (EAE) is formed by 12 national ETICS associations, 6 important European components' associations and 11 supporting company members. The EAE represents about 80 per cent of Europe's revenue from ETICS. The European ETICS market includes international operating companies as well as hundreds of SMEs.

The EAE represents the ETICS business in CEN and EOTA working groups as well as in public consultations of the European Commission. EAE is a member of Construction Products Europe (CPE), the European Council for Construction Research, Development and Innovation (ECCREDI), the Construction 2050 Alliance, and supporter of the Renovate Europe Campaign. Furthermore, EAE is in contact with associations and initiatives beyond European borders. The association holds liaisons with the EIFS Council of Canada, the China Association of Building Energy Efficiency (CABEE), the Japanese Association for Housing Thermal Insulation Technology Coop. (NDJK) and the EIFS Industry Members Association (EIMA) in the United States of America.

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