

## Change for the Better position paper on Energy Performance of Buildings Directive

### Key points:

- A zero-emission building stock shall be achieved through a whole-building system approach to energy efficiency in conjunction with the decarbonisation of energy supply.
- Applying the principle of cost-efficiency and rolling out the financial incentives are indispensable to ensure affordability. The revision needs to be balanced to ensure that renovations mitigate energy poverty and that its costs do not negatively influence the most vulnerable households.
- Revision of the EPBD shall be accompanied by measures stemming from other dossiers in the Fit for 55 Package, such as the Energy Efficiency Directive, in order to create synergies that would lead to emissions-reduction.

### Change for the Better's position on the EPBD

Change for the Better supports the proposal and considers the Directive as an essential part of the legislative toolbox to achieve a zero-emission building stock by 2050 and to reduce CO<sub>2</sub> emissions in the EU. Buildings are one of the largest sources of energy consumption in Europe and boosting their energy efficiency shall significantly cut emissions, tackle energy poverty and help to reduce people's vulnerability to energy prices. In this regard, Change for the Better endorses the initiatives for deep renovation and believes that sufficient financial resources stemming from the available funds, such as the Cohesion Fund and the Recovery and Resilience Facility, should be channeled in this direction.

Change for the Better acknowledges the aim to strengthen the current policy architecture which is needed in order to ensure that the building sector contributes to the decarbonisation efforts. It includes the improvement of the national long-term planning under the Building Renovation Plans, the Energy Performance Certificates' framework, as well as the renewed provisions on new buildings.

Change for the Better is convinced that the revision process provides an opportunity to redress the shortcomings and limitations of the current provisions with a view to translate the higher climate ambition into more stringent and effective measures for the building sector to become highly energy efficient, sustainable



and fully decarbonised. However, the revision needs to be carefully balanced to ensure that renovations mitigate energy poverty and that their cost is not borne by the most vulnerable households.

### **Synergies and long-term investments**

Change for the Better highlights that the long-term target should be to provide certainty for investments, mobilise public resources for energy efficiency investments in the buildings sector and develop innovative financing solutions as an energy performance contracting model. Moreover, the innovation shall be encouraged by adjusting the Directive to technology developments in the buildings sector. In order to fulfil the decarbonisation efforts in buildings, heating and cooling, the EPBD shall also be accompanied by measures from other initiatives from the Fit for 55 Package such as the ETS for buildings, the Effort Sharing Regulation, the Energy Efficiency Directive or the Renewable Energy Directive.

### **Deployment of electric vehicles**

Change for the Better welcomes the rollout of electric charging infrastructure that helps to accelerate the green transition. A lack of recharging and refuelling infrastructure could be a limiting factor for a fast ramp-up of zero emission mobility. It is necessary to build up a private charging infrastructure that would complement the public charging. Smart charging functionalities should be ensured in places where electric vehicles park for extended periods such as residences or places of employment. In new buildings, charging infrastructure should generally be planned for every parking spot, provided that the building has a parking area. In existing buildings, a more gradual expansion of the charging infrastructure is necessary.

### **New zero-emission buildings**

Change for the Better appreciates the ambition that all new buildings must be zero-emission buildings by 2030. Moreover, Change for the Better supports a more ambitious definition of zero-emission buildings and faster roll-out to calculate life-cycle assessments for all new buildings by 2025 and mandatory CO<sub>2</sub> thresholds by 2030. However, given the climate zones within the European Union, Member States should have a certain flexibility in defining the requirements according to regional conditions.

Change for the Better notes that, according to recent studies, the share of building emissions from the use phase, while currently dominant, is likely to comprise a minority share of total building lifecycle emissions within the next 10-15 years. In this regard, Change for the Better believes that the current recast is a critical opportunity to expedite a clear process, time frame and threshold limits for the transition towards a net-zero



emissions framework based on Whole Life Carbon (WLC) to 2030 and beyond and not to postpone this process until the next recast period.

### **Energy performance certificates**

Change for the Better welcomes that the recast of the EPBD introduces minimum energy performance standards to address the worst-performing buildings as a necessary addition to the EU legislative framework for energy efficiency in buildings. Moreover, Change for the Better supports extended energy performance certificates because they offer suitable means to increase the transparency of energy efficiency of buildings in the future.

The certificates should be integrated with other documentation attached to buildings, aligned with the requirements of the EU taxonomy, and should be comparable amongst Member States. Finally, Change for the Better is convinced that a definition of “healthy indoor climate” should be included in the zero-emission buildings definition as well as in the design of energy performance certificates and renovation passports.

### **About Change for the Better**

Change for the Better is a business association of more than 60 companies and more than 200 supporters, which aims to co-create an ecosystem in the Czech Republic where companies excel, while being sustainable to our planet. Change for the Better seeks to develop the environment in which the European Green Deal is seen as opportunity rather than as a threat.

Change for the Better offers an active dialogue, cooperation and engagement in tackling climate change and green transition. Change for the Better is ready to provide the policymakers with necessary support in preparation and implementation of the legislation. Change for the Better offers experience and expertise of its members in areas such as circular economy, clean energy, construction, and agriculture.

Change for the Better believes that the Czech Republic has sufficient resources to create the conditions that will make the Green Deal for Europe a real boost to society and will create new opportunities, whether in a form of new jobs, healthier landscapes, cleaner air, or a better quality of life in all regions. All this while maintaining the principles of a just transition.

**Změna k lepšímu, z.s.**

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