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Recasting of the Energy Performance of Buildings Directive 2002/91/EC
Answers to the online-questionnaire:

General Information

Your profile: [Organisation](#)
Region: [International, with members from European member states](#)
Organisation name: [International Union of Tenants](#)
Organisation type: [Association/Non Governmental Organisation](#)
Main field of activity: [Tenant associations](#)

1. Clarification and Simplification Aspects
 - 1.1 Which of the definitions or requirements of the existing directive should be clarified or simplified?

Preamble:

Nr. 10, delete in sentence 1 “which may be differentiated at regional level”. Add in the first sentence: “The energy performance of buildings should be calculated on the basis of a **uniform** methodology”.

In order to guarantee a transparency in calculation and valuation the energy efficiency of buildings, the calculation methods should be as uniform as possible. At least it is not tolerable to have different calculation methods in one country.

Nr. 13, delete in sentence 1 "above a certain size". All buildings should be included.

Article 3: delete: "or regional level". The label should be uniform at least at a national level.

Article 4: delete: "between new and existing buildings and". New and existing buildings should be valued according to the same calculation scheme to ensure the comparability for prospective tenants or buyers.

2. Thresholds within the directive

2.1 Do you propose that the 1.000 m² total useful floor area threshold for existing buildings that undergo major renovation (article 6 of the directive) be changed or eliminated? **Yes**

Which threshold do you propose and why?

IUT proposes no threshold. If you want to include the residential existing housing stock in the EPBD, delete any threshold. Residential housing, which is in many cases smaller than 1.000 m² should be refurbished energy-efficient when a major renovation is planned. This is a binding condition when the costs for heating and cooling should be reduced.

2.2 Do you propose that the 1000 m² total useful floor area threshold for the requirements on "alternative systems" (article 5 of the Directive) and/or on the display of the energy performance certificate (article 7(3) of the directive) be changed or eliminated **Yes**

2.3 Which threshold do you propose and why?

We propose no threshold when considering the use of alternative systems, which contribute to more energy-efficiency and energy-savings in buildings. Planners should obligatory check the use of cost-effective alternative systems when constructing a new building.

The display of the energy performance certificate should be obligatory for every building used by public authorities and institutions. They should play a leading example for the private sector.

2.4 Do you propose that the thresholds on the rated output of boilers and/or air-conditioning systems subject to regular inspections (article 8 and article 9 of the Directive) be changed or eliminated? **No**

3. Strengthening of Requirements

3.1 Which new/changed requirements or content concerning the energy performance certificate (article 7 of the directive) do you consider to have high impact on realizing energy savings in the buildings sector?

Energy performance certificates should include clear and reliable information for tenants and buyers. A copy of the certificate should be handed out to any prospective buyer or tenant. The certificate shall include reference values and a clear valuation label about the energy efficiency. The valuation of a building shall be orientated towards the best possible energy standard (passive houses). The labels should be uniform at least in one country to ensure the comparability of different types of buildings (one family houses with multiple dwellings) nationwide. Regionally different labels should be out of question. The quality of the labels should be ensured by setting clear standards for the qualification of the experts who calculate the energy efficiency of the buildings. The recommendations for the cost-effective improvement of the energy performance should be explicitly linked to the

evaluated building. Recommendations for modernization should be as concrete as possible. Standardized, general recommendations are useless. The prospective tenants or buyers of the houses should be fully informed about the concrete measures recommended. They are a binding part of the certificate. If the owners of the buildings refuse to show the energy certificate, there should be sanctions. A maximum level of information of the demand side of the market will lead to a higher demand for energy-efficient buildings. Therefore the certificates have to be as transparent as possible for consumers.

3.2 Due to the complexity and variation of boundary conditions in the 27 member states (e.g. with regard to the existing buildings stock, outdoor climate conditions, costs of energy, labour and material, taxes etc.) minimum energy performance requirements are not stipulated at EU level in the existing directive. They are left for the member states to define as regards both their definition and parameters instead. What type of approach do you consider feasible and effective which could be laid down at EU level with regard to minimum energy performance requirements for buildings?

A basis could be to define minimum energy standards for the construction of new houses. The energy- efficiency of a building can also be taken into account when setting the rents of a building. Dwellings with a good, evaluated energy performance will achieve higher rents than buildings without any energy-saving refurbishment. According to the top-runner model, low-energy buildings should be standard in the year 2020. In buildings with a lower energy performance the tenants have the right to reduce the payment for the heating and cooling costs to the landlords.

3.3 Which other requirements do you consider to need strengthening, and in which way?

A definite precondition to keep energy-efficient renovation affordable for landlords and tenants are incentives by the national governments. These can be subventions, tax-reductions or low interest mortgages. The national programs have to be fixed long term in order to guarantee a stability for the investors.

4. The role of the public sector

Besides the current requirement of the Energy Performance of Buildings Directive for the public sector to display the energy performance certificate in a prominent place: Do you consider the public sector should play a stronger role to act as a leading example for energy savings in buildings? **Yes**

4.1 What further requirements would you propose to include in the directive for the public sector in order to act as a leading example for energy savings in buildings?

Implement models of energy-contracting, renewable energies, CHP, heat pumps, district block heating and cooling.

5. Other

5.1 Do you consider that climate adaptation should significantly influence the level of requirements laid down by buildings regulation? **Yes**

5.2 Do you propose other aspects/ideas than the aforementioned to be included in the recasting of the Energy Performance of Buildings Directive? **Yes**

5.3 What other requirements do you propose?

Include sanctions in the Directive. Energy certificates for buildings shall be obligatory. They shall be obligatory handed out to prospective tenants and owners. Legal proceedings shall be included in the sanctions.

Kind regards

(Original signed by)

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International Union of Tenants