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## International Union of Tenants Association Internationale des Locataires

**Stockholm (Hq):**  
P.O. Box 7514  
103 92 Stockholm, Sweden  
Tel: +46 8 791 02 25  
Fax: +46 8 20 43 44, e-mail: [info@iut.nu](mailto:info@iut.nu)

**Brussels and the EU:**  
Barbara Steenbergen  
Rue du Luxembourg 23  
B-1000 Brussels, Belgium  
Tel : +32 2 513 0784  
Fax: +32 2 513 0955  
e-mail : [barbara.steenbergen@iut.nu](mailto:barbara.steenbergen@iut.nu)

### **IUT Secretariat:**

President; Sven Carlsson, Sweden, Vice President; Richard Hewgill, England  
Secretary General; Magnus Hammar Assistant Secretary; Annika Ekström

Ms. Silvia Adriana Ticau  
Member of the European Parliament  
ASP 07 H265  
Rue Wiertz 60

B- 1047 Brussels  
Fax: +32 2 28 498 38

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Dear Ms. Ticau,

The International Union of Tenants (IUT) takes the chance to address to you as Rapporteur of the Recast of the Energy Performance Buildings Directive (EPBD) COM **2008/780 - 2008/0223 (COD)**.

### **Preface:**

IUT, representing more than 5 million tenants in the EU 27 organized in 34 national and regional tenant organisations, welcomes the recast of the EPBD. In the context of the economic crisis and the decrease of the purchasing power of the consumers, it is very important to improve the energy efficiency of buildings. This process has to be speeded up. The percentage of energy efficient new and existing buildings remains low. According to the low new construction rates in residential buildings, the existing housing stock should be in the focus of the directive.

### **Transparency:**

A higher energy performance of residential buildings leads to crucial cost savings for the household expenditure. The best way to make energy efficiency investments more attractive is to create transparency about the future energy costs and possible energy savings. Energy performance certificates for buildings must provide clear and reliable information for tenants and buyers. A maximum level of information of the demand side of the market will lead to a higher demand for energy-efficient buildings. The certificates have to be as transparent as possible for consumers.

### **Incentives:**

In the European Economic Recovery Plan (EERP) is stated that “Member States and EU-institutions should take urgent measures and should set demanding targets for ensuring that public buildings and both private and social housing meet the highest European energy efficiency standards and make them subject to energy certification on a regular basis”. To reach this goal, it is essentially to increase the impact of the existing funds. The opening of the European Regional Development Fund (ERDF) for the energy efficient renovation of housing in all member states was a first step. It is necessary that the current ceiling of the ERDF dedicated for energy efficiency measures in housing is increased. To re-programme the structural funds operationally, the procedure should be less bureaucratic in order to allow priority interventions of the Member states.

### **Lower the burdens of investment:**

Homeowners and landlords are often unable to finance the large investments in energy saving measures. A definite precondition to keep energy-efficient refurbishment affordable for landlords and tenants are incentives by the national governments and banks. Incentives 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. Also the European investment bank (EIB) and other financial institutions like the European bank for reconstruction and development (EBRD) should increase the volume of cheap loans targeted to climate and energy efficiency investments.

According to these basic requirements we propose to you to consider the following amendments in your report: **(IUT-proposals for changes underlined)**

#### **1) Amendment 1**

##### **Article 7: Existing buildings**

Member States shall take the necessary measures to ensure that when buildings undergo a major renovation their energy performance is upgraded in order to meet minimum energy performance requirements in so far as this is technically, functionally and economically feasible. **The use of alternative systems in accordance with article 6 has to be considered and taken into account. The use of alternative systems in buildings shall be obligatory combined with energy-efficiency and energy-saving measures.**

##### **Justification:**

The use of alternative systems like renewable energy, cogeneration, district or block heating or cooling and heat pumps like in article 6 (new buildings) should be also considered in the existing housing stock when undergoing major renovations. Especially the existing housing stock is in conclusively in the focus, in many European countries the construction of new housing is decreasing. The use of renewable energies and alternative systems has direct impact on the housing costs. In rental housing, it can be split on the rents. In order to keep the rents and the heating costs affordable the use of alternative systems in buildings shall be obligatory combined with energy-efficiency and energy-saving measures.

#### **2) Amendment 2**

##### **Art. 2: Definitions**

For the purpose of this directive, the following definitions shall apply:

(6) “major renovation” means the renovation of a building where

- (a) the total cost of the renovation related to the building envelope or the technical building systems is higher than 20% of the value of the building, excluding the value of the land upon which the building is situated, or
- (b) more than 20% of the surface of the building envelope undergoes renovation

**Justification:**

The focus for energy efficiency has to be concentrated on the existing housing stock. Therefore the definition of major renovation shall be reduced from the 25% levels down to 20%.

**3) Amendment 3**

**Article 19: Information**

Member states shall take the necessary measures to inform the owners or tenants of buildings of parts thereof as to the different methods and practices that serve to enhance energy performance. Member states shall in particular provide information to the owners or tenants of buildings on energy performance certificates and inspection reports, their purposes and objectives, on cost-effective ways to improve the energy performance of the building and on mid- and long-term financial consequences if no action is taken to improve the energy performance of the building. Member states shall inform owners or tenants on existing financial incentives for energy efficient renovation of buildings.

**Justification:**

A direct link to targeted funding tools should be part of the recommendation for residents.

**General valuation:**

The International Union of Tenants thinks that it is essentially to speed up the process of the implementation of the new energy performance buildings directive. We are counting on a fast legislation process on European level. The existing proposal of the commission is generally balanced and the interest of the demand side of the tenants and residents to have a maximum of transparency when receiving the energy certificates is taken into account.

Kind regards,

(Originally signed by)

Barbara Steenbergen  
International Union of Tenants  
Head of liaison office to the EU