



EuroWindowor feedback on European Commission's Inception Impact Assessment on the Energy Performance of Buildings Directive

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EuroWindowor welcomes the opportunity to comment on the European Commission's Inception Impact Assessment on the Revision of the Energy Performance of Buildings Directive (EPBD).

As identified at this early stage of the review process by the European Commission, we acknowledge the necessity to revise the EPBD to deliver on the Renovation Wave and Green Deal objectives. In light of the European ambitions to achieve 55% net emissions reduction by 2030 and become climate neutral by 2050, we fully support Option 3 as described in the Inception Impact Assessment. Particularly given that energy renovation of buildings has been identified as a key European flagship for national recovery plans, we should make sure to invest in measures which lead to energy efficient and sustainable buildings.

We therefore believe that the upcoming revision is an opportunity to secure the introduction or the update of a coherent set of measures that will enable the green transition and benefit all Europeans. The Inception Impact Assessment represents a good starting point. Key components of a strengthened EPBD are:

- The phased introduction of mandatory Minimum Energy Performance Standards (MEPS) for all building types to secure that ambitious national renovation objectives are met.
- An improved framework for Energy Performance Certificates, especially the inclusion of additional information, to ensure that key renovation triggers are harnessed, and that essential information on wider benefits of energy renovations, e.g. health and comfort is available for all Europeans.
- The introduction of stricter requirements for all Public Buildings to secure that not only the quantity (as addressed by Article 5 of the EED for buildings owned and occupied by central governments), but also the quality of energy renovations is addressed.
- A stronger focus on minimum requirements for Indoor Environmental Quality (IEQ) by addressing health and comfort (Daylight, Air Quality, Summer Comfort...) in NZEB definitions to secure the long-term resilience of the European Building stock and align design criteria with the needs of end-users.

A consideration of embodied CO₂ emissions of building materials when setting global requirements for new buildings to secure the decarbonisation of the future EU building stock, as suggested in the Inception Impact Assessment and already initiated by several Member States.

Finally, as far as our specific sector is concerned: windows, doors and other transparent areas have the ability to allow the intake of free solar gains through a building's envelope. This specificity – known as Energy Balance – should be factored in by Member States as the appropriate product criterion in national regulations on building modernization.

We look forward to supporting the European Commission throughout the revision process.

About EuroWindoor AISBL – EuroWindoor AISBL was founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 19 national associations speak for European window, door and facade manufacturers that are in direct contact with consumers, and thereby having large insights on consumers' demands and expectations. We are at the forefront interacting with dealers, installers and consumers buying windows and doors, and the companies behind the associations cover selling all over Europe.



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