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INFORSE-Europe Positions to Energy Service Directive and Energy Performance in Buildings Directive (EPBD)

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The EPBD was to be implemented by January 2006 while the Energy Service Directive implementation includes national energy efficiency action plans that were due July 2007.

Recommendations from INFORSE-Europe

Energy Performance in Buildings Directive (EPBD):

The countries shall use their freedom in the implementation to set strong energy efficiency standards, so the building code becomes an effective driver for energy efficiency in houses.

Focus on building renovation is important, including how to implement efficiency in practice for renovation.

The countries should use the opportunity to demand cost-effective solar heating for new and renovated buildings.

As part of the building codes, also air tightness of buildings should be a demand for new buildings, in combination with good ventilation to ensure a good indoor climate. Mechanical ventilation should include heat recovery during the heating season.

The demands should reward use of passive heating, passive cooling and optimisation of daylight use.

The progressive improvement of standards is important, and it is therefore important that the countries announce intentions for stricter standards as early as possible.

It is important that the countries support the development of above-standards houses (low-energy houses, passive-houses) with the establishment of voluntary standards, that can be used by owners to set demands when ordering new buildings, and for municipalities to set demands for special low-energy urban development areas. It is also important to support the development of new energy efficiency and energy recovery solutions such as heat recovery from warm water and from cooking.

It is important with regular labelling of smaller houses, thus INFORSE-Europe recommends that smaller houses have energy labels updated every 5 year.

Regular update of the building regulation is important to increase energy efficiency with the technological development. Countries should start the update process now, so it can be enforced in 2010-11, 4-5 years after the first implementation of the EBPD. INFORSE-Europe recommends that the above-mentioned proposals are integrated in new regulations, for countries that do not already have enforced them.

Energy Service Directive:

The actions included should not overlap with the implementation of other EU legislation and programs. The main overlap is with activities covered by EBPD.

While it can be a good strategy to demand that energy utilities (energy distributors) shall take upon them an energy efficiency obligation, it is a risk to go straight into a system with trade-able White Certificates, where utilities can trade the fulfilment of their obligations via such certificates before a credible system for energy efficiency obligations have been in place for period. Such a period must be long enough to show eventually weaknesses of an energy efficiency obligations system, e.g. three years.

It is important to address electric heating in the measures: to reduce existing electric heating and to avoid that the energy efficiency measures lead to new use of electric heating.

Status of Implementation of Directives, December 2007

Energy Performance of Buildings Directive

According to reports from national implementation, the EPBD have resulted in an overhaul of building regulation for all countries. This has lead or will lead to better enforcement of the energy requirements for new buildings and in some countries also to higher standards. The directive requires standards for major renovations, which is also part of national implementation; but generally for the countries the enforcement of this is less certain than for new buildings.

The provisions of the EBPB are still not in force in all countries, e.g. the new demands for buildings will only be introduced in Austria in 2008.

The demands for new buildings are different between countries, also in the same climate zones.

Some countries have announced ambitious goals for future buildings, such as the UK that announced that buildings from 2016 shall be Zero-Carbon Buildings.

Energy Service Directive

The first milestone of the Energy Service Directive was the first submission of energy efficiency action plans compiling the energy efficiency activities of the countries, with focus on activities of utilities that are the special focus of the energy service directive. By the end of November, 23 of the 27 EU had submitted their energy efficiency action plans. Some countries have submitted existing plans, such as the Danish plan from 2005, while other countries have used the opportunity to update an existing plan, such as the UK that updated an energy efficiency plan from 2004. Other countries have made new plans made specifically for the implementation of the directive.

Overview of some measures included in the national action plans:

In some of the national action plans a substantial part of the measures are implementation of the EPBD. While these measures are valuable, their inclusion in the national action plans do not add extra to energy efficiency in the countries, compared with implementation of existing EU legislation.

In some countries, measures are promoting electric heating, such as the Danish measure to allow electric heating in low-energy housing. While the intention (to support low-energy housing) is valuable, it is not certain from the National report that the change to low-energy housing (from standard housing according to the building code) gives larger benefits than the extra social and environmental costs of changing to electric heating from a less environmental harmful heating source (typical district heating or natural gas).

The responsibility of the network utilities (electricity, gas, heat) for energy efficiency activities is included in many action plans. Examples of demands on energy suppliers:

-UK, 25 TWh = 17% of target for 2010 increasing to 57 TWh p.a. in 2016 = 21% of total target
-DK 3 PJ p.a. (equal to 0.8 TWh) = 40% of total target.

In some countries the national action plans includes the introduction of "White Certificates" and the plans for a national market for White Certificates (certifying implemented energy efficiency measures to meet efficiency requirements for utilities or others). While it is too early to judge the value of a market for White Certificates, there is some uncertainty of the credibility of the White Certificates, in particular in countries where there is no experience with tracking the implementation of energy efficiency measures. Lack of credibility and cases of cheating can undermine a system, in particular if certificates are sold to a third party.

Targeted energy efficiency campaigns is a measure included in many action plans.

Energy efficiency requirements in public procurement is included in some action plans.

Some countries also plan to focus in increased information to consumers in various ways, including promotion of advanced energy meters.

Other activities, such as R&D are also included in several action plans.

The activities are mostly a combination of ongoing programs and update/continuation of the programs. For some countries it is difficult to judge which of the activities in the energy efficiency action plans that are new, related to the implementation of the energy service directive, and which were existing programs and activities.

An important part of the energy service directive is the obligation to save 9% final energy in the period 2007-2016 (1% per year). Some countries have set higher national targets (e.g. UK 18%, Denmark 1.7% p.a. at least until 2013).

Information on INFORSE-Europe positions on EU policy is available at www.inforse.org/europe/eupolicy.htm

Information on the European Building Performance Directive (EPBD, directive 2002/91) is available from <http://www.buildingsplatform.org/>

National energy efficiency action plans and information on the Energy Service Directive (directive 2006/32) are available at: http://ec.europa.eu/energy/demand/legislation/end_use_en.htm#efficiency